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Class Counsel

U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KAREN SOLBERG, NANCY MORIN, and NARISHA
BONAKDAR, on their own behalf and on behalf
of others similarly situated,

Plaintiffs,

v.

VICTIM SERVICES, INC., d/b/a
CorrectiveSolutions, NATIONAL CORRECTIVE
GROUP, INC., d/b/a CorrectiveSolutions,
AMERICAN JUSTICE SOLUTIONS, INC., d/b/a
CorrectiveSolutions, BIRCH GROVE HOLDINGS,
INC., MATS JONSSON and KARL THOMAS
JONSSON,

Defendants.

NO. 3:14-cv-05266-VC

**DECLARATION OF PAUL ARONS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT OF
LITIGATION COSTS, AND SERVICE AWARDS**

Honorable Vince Chhabria

CLASS ACTION

DEMAND FOR TRIAL BY JURY

DATE: August 5, 2021

TIME: 2 p.m.

LOCATION: Zoom video conference

I, Paul Arons, declare as follows:

1. I am one of the attorneys of record for plaintiffs in this action and I am making this declaration in that capacity.

2. I have spent more than 959.71 hours of time working on this case. Prior to filing I was first contacted by the people who ended up as class plaintiffs in late 2013 and early 2014. I spent several months investigating the facts with each plaintiff and ultimately associated with the Terrell Marshall Law Group, Gupta Wessler, and California local counsel Michael Ram to file this class action lawsuit. As the Court is aware, this case was heavily litigated with multiple motions to dismiss, multiple appeals, a class certification motion and two motions for summary judgment. Plaintiffs obtained substantial discovery from Defendants. I was heavily involved in discovery and personally took all or parts of five depositions of defendants or their employees, five depositions of representatives of various district attorney's offices, and the depositions of a third-party creditor. Additionally, I shared primary responsibility for Public Records Act requests to district attorneys' offices throughout California and subpoenas to major creditors that referred unpaid checks to Defendants for collection. Finally, I personally participated in three mediations held in Los Angeles, and the final settlement conference before Judge Beeler which ultimately led to settlement.

3. Throughout the case I had significant responsibility for drafting pleadings and discovery, reviewing and analyzing discovery responses, participating in a litigation and settlement strategy, and participating in mediation and post-mediation negotiation of the final terms of the settlement agreement.

4. As is true with all the class action litigation in which I represent consumers, there is no guarantee of payment and substantial risk of non-payment based on the dynamics of the case. Here, the novelty of the issues being litigated, the financial condition of the Defendants and obstacles to insurance coverage all contributed to a greater than average risk that the Plaintiffs' attorneys would not be paid. The nearly 1,000 hours I spent on this case

since 2014 was 1,000 hours that I was precluded from working on other, perhaps less risky, litigation.

5. I have exercised billing judgment and I only record time where I actually take some action, rather than simply observing work performed by my co-counsel. I do not record time for reviewing or responding to emails where I do not need to exercise any skill or judgment, such as simply scheduling an event or forwarding a document. I also reduce the time I record if I subjectively determine that a task does not justify the time it actually took to complete the task. Thus, the time I record on a case is always less than the time I actually spent. I only record time for which I think I would be justified charging a fee-paying client. I spent more than 1,000 hours on this case, 959.71 of which are recorded, billable hours. Based on the rate of \$775/hour, I spent \$736,520.23 worth of compensable time on this case.

6. When I first began recording time on this case in 2014, I was using a timekeeping application that I changed from in October 2017. I was not able to import the prior time records into my new system, so I generated a billing report from both the old and new systems, and then manually combined them in an Excel spreadsheet, that is filed herewith as Exhibit 1. , The formatting changes starting with a time entry on October 8, 2017. I also manually redacted the records to delete descriptors of confidential communications with the Plaintiffs or descriptions of confidential attorney work product. I have the original unredacted entries which I can make available to the Court.

7. My time records were kept contemporaneously and do not reflect any block billing. My hourly rate is reasonable based on my extensive experience, skill, and sophistication required for the types of legal services typically performed and the rates customarily charged in the markets where my legal services are typically performed.

8. I have substantial legal experience going back over forty years. This include extensive experience representing plaintiffs in class actions, primarily under the Fair Debt

Collection Practices Act and related state laws, but also in challenging a number of predatory practices targeting ordinary consumers.

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

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

11. Since approximately 1993 much of my law practice has been focused on consumer class actions filed under the Fair Debt Collection Practices Act, focusing especially on the area of check collection. Notable cases include that I co-counseled include *Newman v. Checkrite California, Inc.*, Civ. No. 93-1557 LKK (E.D. Cal.), a seminal case in the area of FDCPA litigation against check collectors, in which a \$4.3 million settlement fund was created. The

published summary judgment decision in that case, *Newman v. Checkrite California, Inc.*, 912 F. Supp. 1354 (E.D. Cal. 1995) has been cited in over one hundred federal court decisions. I have also represented plaintiffs in a number of other class actions filed pursuant to the FDCPA. *Ballard v. Equifax Check Servs., Inc.*, Civ. No. S-96-1532 FCD (E.D. Cal., filed 8/26/96), a case that involved almost 1,500,000 class members, settled for approximately \$8,000,000. There are three published opinions arising from this lawsuit. *Ballard v. Equifax Check Servs., Inc.*, 27 F. Supp. 2d 1201 (E.D. Cal. 1998) [granting summary judgment for the individual plaintiff], *Ballard v. Equifax Check Servs., Inc.*, 186 F.R.D. 589 (E.D. Cal. 1999) [granting class certification], and *Ballard v. Equifax Check Servs., Inc.*, 158 F. Supp. 2d 1163 (E.D. Cal. 2001) [granting classwide summary judgment on liability issues. *Irwin v. Mascott*, Civ. No. 97-4737 JL (E.D. Cal., filed 12/31/97), was an FDCPA class action that involved approximately 600,000 class members and settled for more than a million dollars. There are four published decisions in that case, *Irwin v. Mascott*, 96 F.Supp.2d 968 (N.D. Cal. 1999) [granting class certification], *Irwin v. Mascott*, 94 F. Supp. 2d 1052 (N.D. Cal. 2000) [denying defendants' motion to add third-party defendants], *Irwin v. Mascott*, 112 F. Supp. 2d 937 (N.D. Cal. 2000) [granting summary judgment and issuing permanent injunction], and *Irwin v. Mascott*, 370 F.3d 924 (9th Cir. 2004) [affirming contempt order against defendants]. I co-counseled *Hunt v. Check Recovery Sys.*, 241 F.R.D. 505 (N.D. Cal. 2007), an FDCPA class action involving unlawful check collection charges. Plaintiffs prevailed on summary judgment. *Hunt v. Check Recovery Sys.* 178 F. Supp. 2d 1157 (N.D. Cal. 2007). Defendant appealed that decision to the Ninth Circuit, which referred the case to the California Supreme Court, to decide the state law issue of whether a debt collector may seek both a statutory service charge, and prejudgment interest on a dishonored check. I argued the issue before the California Supreme Court, which ruled for plaintiffs and against the debt collector. *Imperial Merchant Servs., Inc. v. Hunt*, 47 Cal. 4th 381 (Cal. 2009), [97 Cal. Rptr. 3d 464]. In an interlocutory appeal in the same case, I succeeded in obtaining the first federal appellate court ruling that a district court has discretion to shift

class notice costs to defendants, once liability has been established. *Hunt v. Imperial Merchant Servs., Inc.*, 560 F.3d 1137 (9th Cir. Cal. 2009). Since beginning to practice in Washington in 2014 I have co-counseled successful individual and class action cases on behalf of consumers, including *Dibb v. Alliance Receivables Management, Inc.* Case No. 3:14-cv-05835 RJB (WD. Washington), a class action, in which we were able to negotiate a settlement providing almost \$2,000,000 in direct payments and debt relief to class members.

12. Since becoming licensed to practice to practice law in the State of Washington in 2014, I have represented Washington consumers in successful class actions against debt collectors in *Cavnar v. Bounceback*, 2:14-CV-235-RMP (E.D. WA) and *Dibb v. Allianceone Receivables Mgmt.*, No. 14-5835 RJB (W.D. Wash.). I have been plaintiff's counsel in a number of other class action lawsuits and I have been continually involved in class action litigation since 1993. A LEXIS search shows over 100 federal district and appellate court decisions in cases where I was either lead, or co-lead counsel.

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

I declare under penalty of perjury under the United States of America that the foregoing is true to the best of my knowledge, that if called as a witness I could competently testify thereto, and that this declaration is executed in Friday Harbor, Washington, on this 10th day of June, 2021.

/s/ Paul Arons, CA #84970
Paul Arons, CA #84970

— EXHIBIT 1 —

Date	Description	Hours	Rate	Amount
2/6/2014	Tel. call with potential client to investigate facts	0.50	\$ 775.00	\$ 387.50
2/6/2014	Draft file memo re: facts of the case after reviewing phone call notes and emails from Mr. Breazeale.	0.60	\$ 775.00	\$ 465.00
			\$ 775.00	
2/6/2014	Emails to Kevin seeking additional documents	0.20	\$ 775.00	\$ 155.00
2/7/2014	Review and respond to Kevin's emails re: transaction with the dealer.	0.20	\$ 775.00	\$ 155.00
2/7/2014	Review and respond to email from Kevin Breazeale re: payments made by car dealer.	0.20	\$ 775.00	\$ 155.00
2/8/2014	Review and respond to email from Kevin re: dispute letter.	0.20	\$ 775.00	\$ 155.00
3/7/2014	Tel. call from Kevin re: current status and developments with both the car dealer and NCG	0.20	\$ 775.00	\$ 155.00
3/7/2014	Email to Kevin re: responding to latest demand letter.	0.10	\$ 775.00	\$ 77.50
5/18/2014	Draft memo for Beth Terrill and Deepak Gupta summarizing facts and law relating to possible class action by Breazeale and Solberg against NCG, et al.	1.20	\$ 775.00	\$ 930.00
12/13/2014	Emails with Kevin Vu re: relationship of bad auto repair to class action.	0.20	\$ 775.00	\$ 155.00
1/2/2015	Review email and send letter to potential witness	0.20	\$ 775.00	\$ 155.00
1/4/2015	Review potential class member inquiry and send email	0.20	\$ 775.00	\$ 155.00
1/4/2015	Email co-counsel re: potential plaintiff.	0.10	\$ 775.00	\$ 77.50

1/4/2015	Review and respond to email co-counsel re: potential plaintiff.	0.10	\$ 775.00	\$ 77.50
1/5/2015	Review email from potential witness/plaintiff Morin, review documents she sent and look at and copy records regarding Morin from checkprogram.com	0.40	\$ 775.00	\$ 310.00
	Review and organize Nancy Morin docs.	0.20	\$ 775.00	\$ 155.00
	Draft file memo re: Nancy Moring	0.30	\$ 775.00	\$ 232.50
1/7/2015	Tel. call with witness/potential class rep. Nancy Morin	1.30	\$ 775.00	\$ 1,007.50
	Email to Beth Terrell re: witness/potential class rep. Nancy Morin	0.20	\$ 775.00	\$ 155.00
	Send email to Nancy Morin	0.10	\$ 775.00	\$ 77.50
	Draft memo re: witness/potential class rep. Nancy Morin, detailing facts, impressions and litigation options	1.20	\$ 775.00	\$ 930.00
1/12/2015	Review email from Deepak Gupta and send email to Nancy Morin	0.10	\$ 775.00	\$ 77.50
1/15/2015	Tel. call to Nancy Morin re: case status	0.10	\$ 775.00	\$ 77.50
1/17/2015	Review and analyze settlement in Wynn v. NCG (Pennsylvania case settled in Jan. 2015)	0.80	\$ 775.00	\$ 620.00
1/26/2015	Review email and collection letters sent by Nancy Morin	0.10	\$ 775.00	\$ 77.50
1/26/2015	Send email to Nancy Morin re:collection letters and proof of mailing	0.10	\$ 775.00	\$ 77.50

1/26/2015	Initial research re:applicability of anti-spam statutes to debt collectors	0.50	\$ 775.00	\$ 387.50
1/29/2015	Review and respond to email from Blythe Chandler re: amending complaint and	0.30	\$ 775.00	\$ 232.50
	obtaining local counsel; review Local Rules re: need for local counsel			
1/29/2015	Tel. call to Nancy Morin	0.10	\$ 775.00	\$ 77.50
1/29/2015	Tel. call to Nancy Morin	0.30	\$ 775.00	\$ 232.50
1/29/2015	Email to Blythe Chandler re: Nancy Morin	0.10	\$ 775.00	\$ 77.50
1/29/2015	Visit checkprogram.com to confirm Nancy Morin's account is still active and	0.20	\$ 775.00	\$ 155.00
	discover that agreement to arbitration provision is required to schedule a class			
	online. Email these facts to co-counsel			
1/29/2015	Draft Nancy Morin allegations, including a review of all letters and notes	1.10	\$ 775.00	\$ 852.50
1/29/2015	Email Nancy Morin	0.10	\$ 775.00	\$ 77.50
1/29/2015	Email Nancy Morin allegations to Blythe Chandler with explanation re: use and	0.10	\$ 775.00	\$ 77.50
	possible changes.			
1/30/2015	Review and respond to Deepak Gupta email re: checkprogram.com web site,	0.10	\$ 775.00	\$ 77.50
	attaching examples			
1/30/2015	Draft Nancy Morin retainer agreement	0.20	\$ 775.00	\$ 155.00
1/30/2015	Email Nancy Morin	0.10	\$ 775.00	\$ 77.50

2/2/2015	Tel call and email with Erika Nusser re: issues with FDCPA coverage for new plaintiff.	0.20	\$ 775.00	\$ 155.00
2/2/2015	Draft fraud and negligence claims for the amended complaint	0.60	\$ 775.00	\$ 465.00
2/2/2015	Email to Erika Nusser re: fraud and negligence claims for the amended complaint	0.10	\$ 775.00	\$ 77.50
2/2/2015	Research potential claims under CAN-SPAM Act and California anti-spam statute.	0.70	\$ 775.00	\$ 542.50
2/2/2015	Email co-counsel re: potential claims under CAN-SPAM Act and California anti-spam statute.	0.10	\$ 775.00	\$ 77.50
2/2/2015	Research individual standing under the Cal. UCL	0.70	\$ 775.00	\$ 542.50
2/2/2015	Email co-counsel re: results of research re: individual standing under UCL	0.20	\$ 775.00	\$ 155.00
2/2/2015	Review and respond to email from Erika Nusser re: revisions to First Amended Complaint	0.20	\$ 775.00	\$ 155.00
2/3/2015	Review and edit First Amended Complaint.	0.80	\$ 775.00	\$ 620.00
2/3/2015	Further review and edit First Amended Complaint re: individual liability allegations for Mats Jonsson.	0.40	\$ 775.00	\$ 310.00
2/3/2015	LEXIS research re: individual liability of a manager/owner under the FDCPA..	0.40	\$ 775.00	\$ 310.00
2/6/2015	Email Amended Complaint to clients	0.10	\$ 775.00	\$ 77.50

2/10/2015	Review email from Erika Nusser re: continuing deadlines and make changes to request	0.20	\$ 775.00	\$ 155.00
2/25/2015	Review 3rd Notice of Failure to Comply letter sent to Nancy Morin/foward to co-counsel	0.10	\$ 775.00	\$ 77.50
2/25/2015	Review certificates of service, reserach VSI addressess and email co-counsel re: failure to serve NCG and duplicate service on VSI.	0.20	\$ 775.00	\$ 155.00
2/27/2015	Email to Beth Terrell re: returning NCG attorney phone call	0.10	\$ 775.00	NO CHARGE
3/10/2015	Review and respond to email from Beth Terrell re: phone call with Mike Taitelman and setting up co-counsel phone conference	0.10	\$ 775.00	\$ 77.50
3/10/2015	Tel. call with Blythe Chandler and Beth Terrell re: discussion with Mike Taitleman re: possible early mediation, and discussion of settlement parameters	0.30	\$ 775.00	\$ 232.50
3/12/2015	Review and comment on pre-mediation letter drafted by Blythe Chandler	0.20	\$ 775.00	\$ 155.00
3/16/2015	Tel. call w/Don Driscoll re: NCG compliance with Smith settlement terms re: language used in letters	0.40	\$ 775.00	\$ 310.00
3/16/2015	Review initial letter required by settlement and compare to Nancy Morin initial letter	0.10	\$ 775.00	\$ 77.50
3/16/2015	Detailed review of differences between letters required by the settlement and letters actually used.	0.20	\$ 775.00	\$ 155.00
3/16/2015	Email to co-counsel re: differences between letters required by the settlement and letters actually used, and question re: appropriate response..	0.20	\$ 775.00	\$ 155.00

3/17/2015	Emails with Don Driscoll re: NCG violation of settlement agreement	0.20	\$ 775.00	\$ 155.00
3/27/2015	Review and respond to Nancy Morin email re: receiving Final Warning letter from VSI; forward to co-counsel	0.10	\$ 775.00	\$ 77.50
3/31/2015	Conference call with Don Driscoll and Beth Terrell	0.50	\$ 775.00	\$ 387.50
3/31/2015	Review CFPB lawsuit and stipulated settlement to assess impact on pending litigation.	0.50	\$ 775.00	\$ 387.50
3/31/2015	Multiple emails with co-counsel re: CFPB lawsuit and stipulated settlement to assess impact on pending litigation.	0.30	\$ 775.00	\$ 232.50
3/31/2015	Review CFPB settlement and draft summary of letter and practice changes mandated by the settlement.	0.40	\$ 775.00	\$ 310.00
3/31/2015	Email coc-counsel re:summary of letter and practice changes mandated by the settlement and impact on pending litigation.	0.10	\$ 775.00	\$ 77.50
4/3/2015	Email to Blythe Chandler re: meeting with plaintiffs in California	0.10	\$ 775.00	\$ 77.50
4/6/2015	Review and respond to email from Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
4/17/2015	Initial review NCG anti-SLAPP motion	0.30	\$ 775.00	\$ 232.50
	Email co-counsel re: NCG anti-SLAPP motion/forward Smith filings made in connection with similar motion.	0.20	\$ 775.00	\$ 155.00
	Review Smith filings made in connection with similar motion.	0.30	\$ 775.00	\$ 232.50
	Initial review NCG Motion to Dismiss	0.20	\$ 775.00	\$ 155.00

	Review Smith file and email co-counsel re: NCG Motion to Dismiss	0.40	\$ 775.00	\$ 310.00
	Review filings in Smith case, and published decision denying motions and email co-counsel about this information.	0.40	\$ 775.00	\$ 310.00
4/20/2015	Review and respond to email from Beth Terrell re: responding to motions/associating counsel	0.10	\$ 775.00	\$ 77.50
4/21/2015	Reveiw email re: assignment to Judge Chhabria; research Chhabria cases and send emails to co-counsel/California practitioners.	0.40	\$ 775.00	\$ 310.00
4/22/2015	Review certificate of interested parties/send email to co-counsel re: LLCP	0.10	\$ 775.00	\$ 77.50
4/24/2015	Phone conference with Deepak Gupta, Blythe Chandler, Beth Terrell and Ericka Nusser re: Motions to Dismiss and to Strike	0.60	\$ 775.00	\$ 465.00
	Review Defendant's anti-SLAPP motion to strike; compare to similar motion file by NCG in Smith case	0.40	\$ 775.00	\$ 310.00
	Email to co-counsel re: defendant's anti-SLAPP motion to strike and similar motion filed by NCG in Smith case	0.10	\$ 775.00	\$ 77.50
4/27/2015	Review and respond to email from Beth Terrell re: hearing dates for defendant's motions	0.10		\$ -
4/29/2015	Tel. call with Blythe Chandler to discuss opposition to D 12(b)(6) motion	0.20	\$ 775.00	\$ 155.00
	Review and respond to co-counsel re: defense proposal to postpone CMC and discovery.	0.10	\$ 775.00	\$ 77.50

5/8/2015	Review and edit opposition to defendant's motion to dismiss	1.10	\$ 775.00	\$ 852.50
	Email to co-counsel re: CMC phone conference	0.10	\$ 775.00	\$ 77.50
5/9/2015	Adapt Request for Production of Document from Smith to serve on NCG	0.30	\$ 775.00	\$ 232.50
	Adapt Interrogatories from Smith to serve on NCG	0.30	\$ 775.00	\$ 232.50
	Email to Beth Terrell re: Discovery from Smith to serve on NCG	0.20	\$ 775.00	\$ 155.00
	Review and organize documents in connection opposing summary judgment	1.70	\$ 775.00	\$ 1,317.50
	Emails to Erika Nusser re: summary judgment opposition	0.10	\$ 775.00	\$ 77.50
	Review and organize documents in connection opposing summary judgment	1.90	\$ 775.00	\$ 1,472.50
6/5/2015	Review and edit draft of interrogatories to VSI	1.30	\$ 775.00	\$ 1,007.50
	Review and edit draft of interrogatories to Matts Johnsson	0.40	\$ 775.00	\$ 310.00
	Email to Blythe Chandler re: discovery revisions	0.10	\$ 775.00	\$ 77.50
6/11/2015	Review and edit 1st Set of Discovery to VSI/NCG	0.50	\$ 775.00	\$ 387.50
	Review and edit 1st Set of Discovery to Matts Johnsson	0.20	\$ 775.00	\$ 155.00

6/17/2015	Review order to comply with ADR selection process	0.10	\$ 775.00	\$ 77.50
	Email co-counsel re: order to comply with ADR selection process	0.10	\$ 775.00	\$ 77.50
6/30/2015	Email to co-counsel re: ADR phone conference	0.10	\$ 775.00	\$ 77.50
7/2/2015	Review ADR filings and email Blythe Chandler re: ADR phone conference.	0.10	\$ 775.00	\$ 77.50
	ADR phone conference with Howard Herman (ADR), Beth Terrell and Sean Hardy	0.20	\$ 775.00	\$ 155.00
7/3/2015	Email with potential witness	0.10	\$ 775.00	\$ 77.50
7/5/2015	Prepare for hearing on motion to dismiss including reviewing all filings, comparing with filings in Smith v. LLC, updating research and drafting memo	3.20	\$ 775.00	\$ 2,480.00
7/6/2015	Travel time-Friday Harbor to San Francisco for hearing on Defendant's Motion to Dismiss/Motion to Strike	6.00	\$ 775.00	\$ 4,650.00
	Prepare for hearing on Defendant's Motion to Dismiss/Motion to Strike	3.50	\$ 775.00	\$ 2,712.50
7/6/2015	Prepare for hearing on motion to dismiss and anti-SLAPP motion	2.50	\$ 775.00	\$ 1,937.50
7/7/2015	Travel time-return to Friday Harbor from San Francisco for hearing on Defendant's Motion to Dismiss/Motion to Strike	6.00	\$ 775.00	\$ 4,650.00
	Prepare for hearing on Defendant's Motion to Dismiss/Motion to Strike	2.50	\$ 775.00	\$ 1,937.50

	Hearing on Defendant's Motion to Dismiss/Motion to Strike	1.20	\$ 775.00	\$	930.00
7/8/2015	Reveiw and respond to multiple emails re:Defendants' Request for extension of time to respond to outstanding discovery	0.30	\$ 775.00	\$	232.50
7/15/2015	Phone conference with co-counsel for status, tasks and updates.	0.10	\$ 775.00	\$	77.50
7/21/2015	Weekly status and update conferecne with co-counsel	0.20	\$ 775.00	\$	155.00
7/27/2015	Review Defendants' CMC Statement re: stay of proceedings	0.20	\$ 775.00	\$	155.00
	Legal research Defendants' CMC Statement re: stay of proceedings	0.40	\$ 775.00	\$	310.00
	Draft revisions to Defendants' CMC Statement re: stay of proceedings	0.70	\$ 775.00	\$	542.50
	Email to Blythe Chandler re revisions to Defendants' CMC Statement re: stay of proceedings	0.10	\$ 775.00	\$	77.50
7/28/2015	Review CMC Statement and email comments to Blythe Chandler	0.10	\$ 775.00	\$	77.50
7/29/2015	Review email and call Blythe Chandler to discuss strategy around motion to stay	0.10	\$ 775.00	\$	77.50
8/4/2015	Review CMC Statement and email Blythe Chandler re: automatic stay issue	0.10	\$ 775.00	\$	77.50
	Tel. call with Blythe Chandler to discuss CMC Conference	0.30	\$ 775.00	\$	232.50

	CMC Conference telephonic appearance	0.40	\$ 775.00	\$ 310.00
	Tel. call with Blythe Chandler re: scheduling for motion to stay proceedings	0.10	\$ 775.00	\$ 77.50
	Research anti-SLAPP applicability to debt collection letters	1.20	\$ 775.00	\$ 930.00
	Email to co-counsel re: motion to have appeal certified as frivolous	0.20	\$ 775.00	\$ 155.00
8/7/2015	Review Mediation Questionnaire in antiSLAPP appeal	0.10	\$ 775.00	\$ 77.50
8/8/2015	Review and edit Motion to Certify Appeal as Frivolous-fact section	0.40	\$ 775.00	\$ 310.00
	Review and edit Motion to Certify Appeal as Frivolous-legal argument section	1.30	\$ 775.00	\$ 1,007.50
8/10/2015	Emails with Blythe Chandler re: motion to certify appeal as frivolous	0.10	\$ 775.00	\$ 77.50
8/11/2015	Update phone conference with co-counsel	0.10	\$ 775.00	\$ 77.50
8/12/2015	Review cases attached by Defendants as examples of stays that were granted when anti-SLAPP motion appealed and prepare notes to email to Blythe Chandler	0.60	\$ 775.00	\$ 465.00
8/17/2015	Review and respond to email from Blythe Chandler re: reassignment to magistrate	0.10	\$ 775.00	\$ 77.50
8/20/2015	Review Blythe Chandler letter re: dismissing appeal and email comments	0.10	\$ 775.00	\$ 77.50

8/22/2015	Review and revise opposition to Defendant's Motion to Stay Proceedings	0.30	\$ 775.00	\$ 232.50
8/24/2015	Review and edit opposition to defendants' motion to stay proceedings/email changes to Blythe Chandler	0.10	\$ 775.00	\$ 77.50
8/28/2015	Review and respond to email from Blythe Chandler re: letter to 9th Circuit mediator. Edit letter.	0.10	\$ 775.00	\$ 77.50
	Review and revise reply memo re: motion to certify appeal as frivolouse/add section on whether collection letters are protected speech	0.60	\$ 775.00	\$ 465.00
8/29/2015	Complete drafting reply memo section in motion to certify appeal as frivolous, section addressing whether collection letters are protected speech	1.40	\$ 775.00	\$ 1,085.00
8/31/2015	Review final version of reply to motion to stay and email suggested change to Blythe Chandler	0.20	\$ 775.00	\$ 155.00
9/14/2015	Review court's order denying stay motions. Email concerns to co-counsel	0.10	\$ 775.00	\$ 77.50
	Email to co-counsel re: discovery stay status	0.10	\$ 775.00	\$ 77.50
9/17/2015	Review draft of Joint Case Management Conference Statement and email comments to co-counsel	0.10	\$ 775.00	\$ 77.50
9/21/2015	Review file and email co-counsel re: ADR phone conference	0.10	\$ 775.00	\$ 77.50
	ADR phone conference, with agreement to go to private mediation	0.20	\$ 775.00	\$ 155.00
	Review Defendants' revisions to Joint Case Management Conference Statement	0.10	\$ 775.00	\$ 77.50

	Email to co-counsel re: revisions to Joint Case Management Conference	0.20	\$ 775.00	\$ 155.00
	Statement			
	Review and respond to email re: CMC statement and mediation stay.	0.20	\$ 775.00	\$ 155.00
9/29/2015	Review CMC Statement and first amended complaint in preparation for CMC conference.	0.20	\$ 775.00	\$ 155.00
	Phone CMC hearing with the court	0.50	\$ 775.00	\$ 387.50
9/29/2015	Tel. call with Blythe Chandler re: CMC and discovery scheduled	0.30	\$ 775.00	\$ 232.50
9/30/2015	Phone conference with Sean Hardy and Blythe Chandler re: discovery deadlines	0.30	\$ 775.00	\$ 232.50
	Tel. call with Blythe Chandler re: discovery deadlines/ motion to compel arbitration	0.10	\$ 775.00	\$ 77.50
	Tel. call with Deepak Gupta re: Motion to Compel Arbitration	0.40	\$ 775.00	\$ 310.00
	Email to Blythe Chandler re: Motion to Compel Arbitration	0.10	\$ 775.00	\$ 77.50
	Emails to Deepak Gupta re: class period arbitration provisions	0.10	\$ 775.00	\$ 77.50
10/5/2015	Emails with Blythe Chandler re: briefing schedule for motion to compel arbitration	0.10	\$ 775.00	\$ 77.50
	Tel. call to Deepak Gupta to discuss motion to compel arbitration and scheduling possibilities	0.20	\$ 775.00	\$ 155.00

	Email to Blythe Chandler re: motion to compel arbitration and scheduling possibilities	0.10	\$ 775.00	\$ 77.50
	Email to co-counsel on arbitration discovery	0.10	\$ 775.00	\$ 77.50
10/7/2015	Research contract issues in connection with motion to compel arbitration	1.00	\$ 775.00	\$ 775.00
	Email to Deepak Gupta re: contract issues in connection with motion to compel arbitration	0.20	\$ 775.00	\$ 155.00
10/8/2015	Multiple emails with co-counsel re: motion to compel arbitration scheduling	0.30	\$ 775.00	\$ 232.50
10/16/2015	Review and respond to email from Blythe Chandler re: 9th Circuit mediation statement	0.10	\$ 775.00	\$ 77.50
10/19/2015	Review Motion to Compel Discovery and related filings	0.50	\$ 775.00	\$ 387.50
10/19/2015	Review data and docs. related to El Dorado County DA Bad Check Restitution	0.80	\$ 775.00	\$ 620.00
	Program and email co-counsel re: suggestions for additional discovery			
10/20/2015	Review email from Sean Hardy re: postponing discovery and appellate briefing and email comments to co-counsel	0.10	\$ 775.00	\$ 77.50
	Phone conference with co-counsel to discuss response to motion to compel arbitration, including discussion of discovery and impact of motion on appellate briefing schedule	0.30	\$ 775.00	\$ 232.50
10/21/2015	Review and respond to email from Blythe Chandler re: proposed discovery on arbitration issue	0.10	\$ 775.00	\$ 77.50
	Review arbitration discovery drafted by Blythe Chandler and add comments	0.20	\$ 775.00	\$ 155.00

	Email co-counsel re: suggested edits to arbitration discovery drafted by Blythe Chandler	0.10	\$ 775.00	\$ 77.50
10/27/2015	Review case management statements and court orders regarding discovery and	0.30	\$ 775.00	\$ 232.50
	send email to Blythe Chandler re: suggested response to Defendants' objection to electronic service of initial discovery			
10/30/2015	Review Defendants' discovery responses and email Blythe Chandler	0.10	\$ 775.00	\$ 77.50
11/2/2015	Tel. call with Blythe Chandler to discuss discovery issues relating to 1st and 2nd Set of Written Discovery Requests	0.30	\$ 775.00	\$ 232.50
	Review letter from Sean Hardy re: arbitration discovery and review cases cited in letter	0.30	\$ 775.00	\$ 232.50
	Review NCV/VSI objections to discovery, review cited cases and draft summary to forward to co-counsel	1.20	\$ 775.00	\$ 930.00
11/3/2015	Review arbitration discovery to defendants and the El Dorado DA's office in preparation for meeting and conferring with Sean Hardy (defense counsel)	0.25	\$ 775.00	\$ 193.75
	Email to Blythe Chandler re: arbitration discovery to defendants and the El Dorado DA's office in preparation for meeting and conferring with Sean Hardy (defense counsel)	0.10	\$ 775.00	\$ 77.50
	Meet and confer with Sean Hardy re: arbitration discovery dispute	0.20	\$ 775.00	\$ 155.00
11/3/2015	Review and edit draft letter submission to court re: arbitration discovery dispute, including locating cases on issue of standing to object to nonparty subpoena	0.30	\$ 775.00	\$ 232.50

	Further review and revising of letter to court re: arbitration discovery dispute	0.30	\$ 775.00	\$ 232.50
	Review memo. re: one-way intervention	0.20		
11/5/2015	Review and respond to email from Blythe Chander re: El Dorado County DA	0.20	\$ 775.00	\$ 155.00
	discovery issues			
	Review PRA response from El Dorado County for 2009 and 2014.	0.70	\$ 775.00	\$ 542.50
11/11/2015	Review and respond to email from Blythe Chandler re: El Dorado County District	0.10	\$ 775.00	\$ 77.50
	Attorney documents			
11/20/2015	Discuss El Dorado County depositions with Blythe Chandler re:motion to compel	0.10	\$ 775.00	\$ 77.50
	arbitration			
11/23/2015	Draft and email case status letter to class representatives	0.30	\$ 775.00	\$ 232.50
	Review Defendants responses to arbitration interrogatories and document	0.40	\$ 775.00	\$ 310.00
	production requests			
	Draft memo to co-counsel re: Defendants responses to arbitration interrogatories	0.20	\$ 775.00	\$ 155.00
	and document production requests			
	Draft email to co-counsel re: Defendants responses to arbitration interrogatories	0.10	\$ 775.00	\$ 77.50
	and document production requests			
11/30/2015	Review email from Sean Hardy re: discovery extension, review our pending	0.20	\$ 775.00	\$ 155.00
	discovery and email comments to co-counsel			
12/2/2015	Draft document request for subpoena to FNIS/Certegy/CPRS, including review of	0.80	\$ 775.00	\$ 620.00
	prior requests.			

12/3/2015	Draft document request for subpoena to First Data/Telecheck/TRS, including review of prior requests.	0.20	\$ 775.00	\$ 155.00
12/4/2015	Review files to prepared for depositions of El Dorado County district attorney's office and witnesses	1.00	\$ 775.00	\$ 775.00
12/7/2015	Email to co-counsel re: arbitration issues and El Dorado County DA depositions	0.30	\$ 775.00	\$ 232.50
	Research arbitration provisions obtained through coercion.	2.00	\$ 775.00	\$ 1,550.00
	Email to co-counsel re: arbitration provisions obtained through coercion.	0.30	\$ 775.00	\$ 232.50
12/8/2015	Emails with Blythe Chandler re: El Dorado County document production	0.10	\$ 775.00	\$ 77.50
	Tel. call to Mike Cicozzi re: El Dorado County docs./email to Blythe Chandler re: status	0.10	\$ 775.00	\$ 77.50
	Email to Blythe Chandler re: arbitration issues	0.10	\$ 775.00	\$ 77.50
	Email to co-counsel re: arbitration issues	0.10		
	Review and respond to email from co-counsel re: arbitration issues	0.20	\$ 775.00	\$ 155.00
	Research re: arbitration and duress/fraud in contracts	1.30	\$ 775.00	\$ 1,007.50
	Review and organize El Dorado County documents for deposition	1.50	\$ 775.00	\$ 1,162.50
12/9/2015	Tel. call from Mike Cicozzi (El Dorado County Counsel) re: documents that will be produced, probably today.	0.10	\$ 775.00	\$ 77.50

	Review public records provided by El Dorado County to obtain potential deposition exhibits	1.20	\$ 775.00	\$ 930.00
	Phone conference with co-counsel to discuss arbitration issues and discovery	1.30	\$ 775.00	\$ 1,007.50
	Review letter from El Dorado County Counsel and email comments to co-counsel	0.10	\$ 775.00	\$ 77.50
	Research necessity to identify parties to contract pursuant to Cal. Civ. Code Sec. 1558, and email case law on this and arbitration issues to co-counsel	1.10	\$ 775.00	\$ 852.50
12/10/2015	Review and select public records documents for deposition of El Dorado County DA	1.00	\$ 775.00	\$ 775.00
	Further preparation for El Dorado County deposition including review of California Crime Statistics documents and review of declarations of Vern Pierson and David Clinchard	2.50	\$ 775.00	\$ 1,937.50
12/11/2015	Tel. call to Mike Cicozzi, El Dorado County county counsel	0.10	\$ 775.00	\$ 77.50
	Emails with Blythe Chandler re: documents produced by DA's office.	0.10	\$ 775.00	\$ 77.50
	Review and organize for deposition document just produced by the El Dorado County DA	1.50	\$ 775.00	\$ 1,162.50
	Email to Blythe Chandler re: financial accountability class materials	0.10	\$ 775.00	\$ 77.50
12/12/2015	Organize exhibits and draft deposition outline	2.00	\$ 775.00	\$ 1,550.00

12/13/2015	Further deposition preparation, draft examination outlines for James Clichard, Vern Pierson and Nancy Anderson	1.50	\$ 775.00	\$ 1,162.50
12/14/2015	Travel time to Placerville for EDC DA deposition	11.00	\$ 775.00	\$ 8,525.00
	Prepare for El Dorado County district attorney depositions	1.50	\$ 775.00	\$ 1,162.50
12/15/2015	Prepare for El Dorado County district attorney depositions	0.50	\$ 775.00	\$ 387.50
	Tel. calls with Blythe Chandler re: depositions of El Dorado County district attorney, Vern Pierson, Assistant District Attorney James Clinchard and Executive Secretary Nancy Anderson	0.20	\$ 775.00	\$ 155.00
12/17/2015	Depositions of El Dorado County district attorney, Vern Pierson, Assistant District Attorney James Clinchard and Executive Secretary Nancy Anderson	6.60	\$ 775.00	\$ 5,115.00
12/18/2015	Review and respond to email from NCG check recipient/forward comments to Blythe Chandler	0.10	\$ 775.00	\$ 77.50
12/19/2015	Tel. call w/witness re: check she received from the CFPB	0.40	\$ 775.00	\$ 310.00
	Tel. call w/wint re: check her son received from the CFPB	0.10	\$ 775.00	\$ 77.50
	Research CFPB checks mailed to NCG victims	0.50	\$ 775.00	\$ 387.50
12/20/2015	Review and respond to email from Deepak Gupta re: depositions of El Dorado County	0.10	\$ 775.00	\$ 77.50
12/23/2015	Phone conference with co-counsel re: depositions and arbitration	0.40	\$ 775.00	\$ 310.00

12/26/2015	Legal research re: collateral source payments form CFPB	0.50	\$ 775.00	\$ 387.50
	Email to co-counsel re: collateral source payments from CFPB	0.20	\$ 775.00	\$ 155.00
	Read and summarize depositions of El Dorado County DA (Nancy Anderson, James Clinchard, Vern Pierson for testimony relevant to arbitration/email memo to co-counsel	1.50	\$ 775.00	\$ 1,162.50
12/27/2015	Emails with co-counsel re: research on collateral source rule and statistical analysis of prosecutions in connection with opposition to motion to compel arbitration	0.10	\$ 775.00	\$ 77.50
12/29/2015	Draft meet and confer response re: interrogatories and document production requests to defendants and forward to Blythe Chandler for review	0.20		
	Review revisions to meet and confer response re: interrogatories and document production requests to defendants and forward to Blythe Chandler for review	0.50	\$ 775.00	\$ 387.50
	Email re: revisions to meet and confer response re: interrogatories and document production requests to defendants	0.10	\$ 775.00	\$ 77.50
	Tel. call to Blythe Chandler re: revisions to meet and confer response re: interrogatories and document production requests to defendants	0.20	\$ 775.00	\$ 155.00
12/31/2015	Email to Narisha Bonakdar re: case status	0.10	\$ 775.00	\$ 77.50
1/3/2016	Review and compile data from "Pending Check Reports" produced by the El Dorado County district attorney at the deposition on 12/15/2015	1.20	\$ 775.00	\$ 930.00

	Draft preliminary analysis of percentage chance of prosecution for possible use in opposition to motion to compel arbitration	1.60	\$ 775.00	\$ 1,240.00
	Email to co-counsel re: preliminary analysis of percentage chance of prosecution for possible use in opposition to motion to compel arbitration	0.20	\$ 775.00	\$ 155.00
1/4/2016	Tel. call with Blythe Chandler re: Joint Case Management Conference Statement and opposition to Motion to Compel Arbitration	0.10	\$ 775.00	\$ 77.50
	Tel. call with Blythe Chandler re: Joint Case Management Conference Statement	0.10	\$ 775.00	\$ 77.50
1/5/2016	Review defendants' revisions to Joint Case Management Conference and forward comments to co-counsel	0.10	\$ 775.00	\$ 77.50
	Draft segment of Joint Case Management Conference statement responding to Sheriff v. Gillie paragraph added by defendants	0.30	\$ 775.00	\$ 232.50
	Review and respond to email re: deposition documents used in the analysis	0.10	\$ 775.00	\$ 77.50
	Tel. call from Blythe Chandler re: Joint Case Management Conference Statement	0.10	\$ 775.00	\$ 77.50
	Compile documents needed for opposition to motion to compel arbitration	0.30	\$ 775.00	\$ 232.50
	Email re: documents needed for opposition to motion to compel arbitration	0.10	\$ 775.00	\$ 77.50
	Review disputed discovery in preparation for meet and confer phone call	0.10	\$ 775.00	\$ 77.50
	Meet and confer phone call with Blythe Chandler and Sean Hardy re: disputed	0.50	\$ 775.00	\$ 387.50

	discovery in 1st Set of Discovery Responses				
	Draft email confirming results of meet and confer phone conference	0.40	\$ 775.00	\$	310.00
1/7/2016	Review and modify proposed subpoenas to First Data and FNIS	0.40	\$ 775.00	\$	310.00
		?			
1/7/2016	Email to Blythe Chandler and Eden Nordby re: proposed subpoenas to First Data and FNIS	0.10	\$ 775.00	\$	77.50
1/8/2016	Emails with Eden Nordby re: service of subpoenas on First Data and FNIS	0.10	\$ 775.00	\$	77.50
	Review class data provided by defendants, run query re: various issues and email	0.30	\$ 775.00	\$	232.50
	conclusions and settlement discussion to co-counsel				
1/11/2016	Multiple emails with Deepak Gupta and Neal Sawhney re: motion to compel arbitration and Narisha Bonakdar declaration.	0.20	\$ 775.00	\$	155.00
	Tel. call with Neal Sawhney re: Narisha Bonakdar declaration	0.10	\$ 775.00	\$	77.50
	Tel. call with Narisha Bonakdar re: declaration	0.10	\$ 775.00	\$	77.50
	Review email with Narisha Bonakdar re: declaration	0.10	\$ 775.00	\$	77.50
	Emails to Narisha Bonakdar/co-counsel re: declaration	0.10	\$ 775.00	\$	77.50
1/12/2016	Draft Narisha Bonakdar declaration	0.40	\$ 775.00	\$	310.00
	Emails with Deepak Gupta re: Narisha Bonakdar declaration	0.10	\$ 775.00	\$	77.50

	Tel. call w/Deepak and Neal re drafting a declaration that supports the statistical data	0.10	\$ 775.00	\$ 77.50
	Review opposition to motion to compel arbitration and email comments and corrections to co-counsel	0.50	\$ 775.00	\$ 387.50
	Draft declaration regarding statistical calculations regarding probability of being prosecuted	0.40	\$ 775.00	\$ 310.00
	Email to Blythe Chandler re: declaration regarding statistical calculations regarding probability of being prosecuted	0.10	\$ 775.00	\$ 77.50
	Prepare for CMC phone appearance and email Blythe Chandler re: issues.	0.10	\$ 775.00	\$ 77.50
1/12/2016	Review revised declaration regarding likelihood of prosecution and email approval.	0.10	\$ 775.00	\$ 77.50
	Initial review of written NCG/VSI discovery responses and flash drive.	1.50	\$ 775.00	\$ 1,162.50
1/13/2016	Multiple emails with Beth Terrell and Blythe Chandler re: initial review of written NCG/VSI discovery responses and flash drive.	0.20	\$ 775.00	\$ 155.00
	Tel. call with Blythe Chandler re: discovery responses	0.10	\$ 775.00	\$ 77.50
	Phone conference with Beth Terrell and Blythe Chandler re: Defendants' discovery responses	0.10	\$ 775.00	\$ 77.50
	Detailed review of NCG Discovery responses, Interrogs. Nos. 1 -15	3.00	\$ 775.00	\$ 2,325.00
1/15/2016	Research issue of alter ego liability of LLC	1.00	\$ 775.00	\$ 775.00

	Email to co-counsel re: issue of alter ego liability of LLC	0.20	\$ 775.00	\$ 155.00
1/21/2016	Review and respond to email from Blythe Chandler re: phone call from Telecheck counsel, Matt Knoop.	0.10	\$ 775.00	\$ 77.50
	Review Birch Grove Holdings insurance policy and email coverage conclusions to Blythe Chandler	0.30	\$ 775.00	\$ 232.50
	Review letter from Matt Knoop to Blythe Chandler re: subpoena to First Data and related parties; email comments and suggested response.	0.10	\$ 775.00	\$ 77.50
1/22/2016	Review certificate of service of subpoena on FNIS and email Blythe Chandler regarding the fact that this is not proof of service on First Data.	0.10	\$ 775.00	\$ 77.50
	Review and make notes re: NCG/VSI responses to interrogatories and requests for production	1.00	\$ 775.00	\$ 775.00
2/4/2016	Edit meet and confer letter to First Data drafted by Blythe Chandler. Email Blythe re: changes.	0.10	\$ 775.00	\$ 77.50
2/5/2016	Review draft surreply memo, locate training manual exhibit and suggest edits to memo.	0.20	\$ 775.00	\$ 155.00
2/5/2016	Review and respond to Blythe Chandler email re: defendant's insurance policies	0.10	\$ 775.00	\$ 77.50
2/10/2016	Tel. call from potential witness	0.20	\$ 775.00	\$ 155.00
	Email to co-counsel re: call from potential witness and Global Payments.	0.20	\$ 775.00	\$ 155.00
2/11/2016	Review Blythe Chandler meet and confer letter, Defendant discovery responses	2.00	\$ 775.00	\$ 1,550.00

	and documents, and draft additional dispute items				
	Email to Blythe Chandler re: meet and confer letters	0.10	\$ 775.00	\$	77.50
	Tel. call with Blythe Chandler re: meet and confer letters	0.60	\$ 775.00	\$	465.00
2/12/2016	Research Global Payments in discovery responses and on internet and prepare document subpoena.	0.30	\$ 775.00	\$	232.50
2/16/2016	Review and respond to email from Blythe Chandler re: subpoenas to Certegy, Telecheck and Global Services	0.10	\$ 775.00	\$	77.50
2/19/2016	Review letter from Matt Knoop (First Data), review prior discovery in Cavnar and Breazeale and draft proposed response.	0.70	\$ 775.00	\$	542.50
	Review discovery in preparation for meeting and conferring with Sean Hardy re: NCG/VSI discovery issues	0.10	\$ 775.00	\$	77.50
	Meeting and conferring with Sean Hardy and Blythe Chandler re: NCG/VSI discovery issues	0.90	\$ 775.00	\$	697.50
	Tel. call with Blythe Chandler re: meeting and conferring with Sean Hardy and re: NCG/VSI discovery issues and tactical discussion re: unresolved issues	0.10	\$ 775.00	\$	77.50
	Review merchant data from Table 3.a and compile list of largest merchant referrers	1.00	\$ 775.00	\$	775.00
2/20/2016	Revise letter to Matthew Knoop (First Data) re: documents that plaintiffs are seeking in subpoena	0.20	\$ 775.00	\$	155.00
2/24/2016	Review and respond to email from Matt Knoop (First Data) re: meeting and conferring in connection with subpoena/review meet and confer letter	0.10	\$ 775.00	\$	77.50

2/29/2016	Meet and confer with Matthew Knoop re: First Data subpoena	0.40	\$ 775.00	\$ 310.00
	Review discovery responses of FNIS/Certegy Check Services, Inc./CPRS Inc.	0.30	\$ 775.00	\$ 232.50
	Legal research re: Gramm-Leach-Bliley as related to discovery responses of Certegy Check Services, Inc., and CPRS Inc.	0.70	\$ 775.00	\$ 542.50
3/1/2016	Review Certegy subpoena responses and begin drafting meet and confer letter to Amy Drushall	1.00	\$ 775.00	\$ 775.00
	Complete drafting meet and confer letter to Amy Drushall re: Certegy and CPRS responses to subpoenas	1.10	\$ 775.00	\$ 852.50
3/9/2016	Review Certegy/CPRS file in preparation for meet and confer phone conference on March 10.	0.20	\$ 775.00	\$ 155.00
3/10/2016	Meet and confer phone conference with Amy Drushall (Certegy) and Blythe Chandler	0.80	\$ 775.00	\$ 620.00
	Tel. call with Blythe Chandler re: meet and confer phone conference with Amy Drushall (Certegy), discussion of strategy	0.30	\$ 775.00	\$ 232.50
3/11/2016	Draft memo. of 3/10/16 meet and confer phone call with Amy Drushall (Certegy)	0.60	\$ 775.00	\$ 465.00
	Revise Blythe Chandler draft of letter confirming 3/10/16 meet and confer phone call with Amy Drushall (Certegy)	0.80	\$ 775.00	\$ 620.00
3/14/2016	Edit Blythe Chandler revised draft of letter confirming 3/10/16 meet and confer phone call with Amy Drushall (Certegy)	0.20	\$ 775.00	\$ 155.00
	Review discovery and send email to Blythe Chandler re: changes to revised draft	0.20	\$ 775.00	\$ 155.00

	of letter confirming 3/10/16 meet and confer phone call with Amy Drushall (Certegy)				
	Draft meet and confer letter to Matthew Knoop, including a review of all discovery files for First Data related documents, and research on 5th Circuit cases re: boilerplate objections	1.20	\$ 775.00	\$	930.00
	Email to Blythe Chandler re: meet and confer letter to Matthew Knoop,	0.10	\$ 775.00	\$	77.50
3/15/2016	Review letter from Leslie de Lara Luck (Global Payments) and annotate subpoena requests	0.20	\$ 775.00	\$	155.00
	Draft letter in response to letter from Leslie de Lara Luck (Global Payments)	0.20	\$ 775.00	\$	155.00
3/17/2016	Call Matt Osborne re: discovery in Haines v. NCG/Global Payments Check Srvc. after locating case in PACER	0.10	\$ 775.00	\$	77.50
3/21/2016	Meet and confer (with Blythe Chandler) with Leslie Luck re: Global Payments subpoena	0.40	\$ 775.00	\$	310.00
	Tel. call with Blythe Chandler re: Global Payments subpoena meet and confer	0.10	\$ 775.00	\$	77.50
4/6/2016	Emails with Blythe Chandler re: Defendants' supplemental discovery responses	0.10	\$ 775.00	\$	77.50
	Review and analyze supplemental discovery responses	0.30	\$ 775.00	\$	232.50
	Email to Blythe Chandler summarizing Defendants' supplemental discovery responses	0.10	\$ 775.00	\$	77.50
	Review documents produced by NCG on March 11, 2016	0.20	\$ 775.00	\$	155.00

4/18/2016	Review and edit supplemental brief on due process and the arbitration provision	1.30	\$ 775.00	\$ 1,007.50
	Email to Deepak Gupta and co-counsel re: supplemental brief on due process and the arbitration provision	0.20	\$ 775.00	\$ 155.00
	Review and respond to multiple emails from Deepak Gupta, Blythe Chandler and Beth Terrell re: revisions to supplemental brief	0.20	\$ 775.00	\$ 155.00
	Review and edit revised supplemental brief on due process and the arbitration provision	0.50	\$ 775.00	\$ 387.50
4/19/2016	Review and edit second revised supplemental brief on due process and the arbitration provision	0.40	\$ 775.00	\$ 310.00
	Email to co-counsel re: edits to second revised supplemental brief on due process and the arbitration provision	0.20	\$ 775.00	\$ 155.00
4/20/2016	Email to co-counsel re: edits to third revised supplemental brief on due process and the arbitration provision	0.20	\$ 775.00	\$ 155.00
5/19/2016	Review and respond to email from Blythe Chandler re: status conference statement and discovery.	0.10	\$ 775.00	\$ 77.50
	Review and edit draft of joint case management conference statement	0.20	\$ 775.00	\$ 155.00
	Email to Blythe Chandler re: revisions to joint case management conference statement	0.10	\$ 775.00	\$ 77.50
5/23/2016	Tel. call with Blythe Chandler re: CMC statement and hearing	0.10	\$ 775.00	\$ 77.50

5/24/2016	Draft section for CMC Statement on Sheriff v. Gillie	1.20	\$ 775.00	\$ 930.00
	Email to co-counsel re: section for CMC Statement on Sheriff v. Gillie	0.10	\$ 775.00	\$ 77.50
5/31/2016	Tel. call from Beth Terrell to discuss CMC Conference	0.10	\$ 775.00	\$ 77.50
	Review CMC Statement and email response to Beth Terrell re: CMC Conference	0.10	\$ 775.00	\$ 77.50
	CMC Conference	0.10	\$ 775.00	\$ 77.50
6/6/2016	Review Global Payments subpoena file and email Blythe Chandler	0.10	\$ 775.00	\$ 77.50
6/8/2016	Review Global Payment Systems' response to document subpoena and draft comprehensive email addressing the unfulfilled agreements that GPS made on	0.70	\$ 775.00	\$ 542.50
6/13/2016	Review check spreadsheet produced by Global Payments	0.30	\$ 775.00	\$ 232.50
	Email to Leslie Luck re: check spreadsheet produced by Global Payments, and other discovery issues	0.20	\$ 775.00	\$ 155.00
6/16/2016	Email to Blythe Chandler re: Rule 30(b)(6) deposition notices	0.10	\$ 775.00	\$ 77.50
6/21/2016	Email to Leslie Luck re: outstanding Global Payments discovery questions	0.10	\$ 775.00	\$ 77.50
6/27/2016	Review file and draft Rule 30(b)(6) deposition notice for Defendants	0.70	\$ 775.00	\$ 542.50

6/28/2016	Complete drafting Rule 30(b)(6) deposition notice for Defendants	0.70	\$ 775.00	\$ 542.50
6/30/2016	Review Super System reports and print relevant reports	0.90	\$ 775.00	\$ 697.50
	Email to Blythe Chander re: Suggested File Layout files that are missing from NCG document production	0.10	\$ 775.00	\$ 77.50
7/6/2016	Review and edit Rule 30(b)(6) depo. notice for National Corrective Group, Inc.	0.40	\$ 775.00	\$ 310.00
	Review and edit Certegy deposition notice	0.40	\$ 775.00	\$ 310.00
	Email to Blythe Chandler re: revisions to Certegy deposition notice and deposition scheduling	0.10	\$ 775.00	\$ 77.50
7/8/2016	Review and respond to email from Leslie Luck (Global Payments) re: subpoenaed documents	0.10	\$ 775.00	\$ 77.50
7/11/2016	Review order for supplemental briefing on issue of FAA coverage of bad check diversion program.	0.10	\$ 775.00	\$ 77.50
	Research issue of FAA coverage of bad check diversion programs and exchange emails on this topic with co-counsel	0.50	\$ 775.00	\$ 387.50
7/15/2016	Review supplemental brief re: motion to compel arbitration and email comments to co-counsel	0.40	\$ 775.00	\$ 310.00
	Review defendant's supplemental brief re: motion to compel arbitration and email comments to co-counsel.	0.10	\$ 775.00	\$ 77.50
8/1/2016	Review and respond to multiple emails from Beth Terrell re: mediation scheduling	0.10	\$ 775.00	\$ 77.50

		7		
8/4/2016	Email to class plaintiffs regarding order denying motion to compel arbitration	0.30	\$ 775.00	\$ 232.50
8/18/2016	Exchange emails with Blythe Chandler re: insurance policy coverage and settlement	0.10	\$ 775.00	\$ 77.50
	Review and respond to emails from co-counsel re: mediation scheduling	0.10	\$ 775.00	\$ 77.50
	Review and respond to email from Beth Terrell re: extending discovery cut-off deadline, including review of existing deadlines	0.20	\$ 775.00	\$ 155.00
8/19/2016	Review and respond to email from Beth Terrell re: mediation	0.10	\$ 775.00	\$ 77.50
9/1/2016	Review and respond to email from Beth Terrell re: extension of discovery cut-off date	0.10	\$ 775.00	\$ 77.50
9/16/2016	Review and edit preliminary draft of mediation brief	1.10	\$ 775.00	\$ 852.50
9/17/2016	Review and analyze new class data produced by Defendants on 9/16/2016, in preparation for mediation, including creating and reviewing Excel spreadsheets and Access databases, looking particularly at fee totals by category, and comparing new and old information to determine completeness of new data	4.50	\$ 775.00	\$ 3,487.50
	Email to co-counsel re: analysis of new data provided by defendant, including a proposed draft of an letter/email to be sent to opposing counsel	0.60	\$ 775.00	\$ 465.00
	Retrieve and review Settlement Agreement in Smith v. Levine Leitchman to	0.80	\$ 775.00	\$ 620.00

	determine scope of release, review class definition in Breazeale, and draft email			
	to co-counsel regarding impact of Smith release on current action.			
	Complete edits and revisions to mediation letter brief	2.50	\$ 775.00	\$ 1,937.50
	Email to co-counsel re: edits and revisions to mediation letter brief	0.10	\$ 775.00	\$ 77.50
9/18/2016	Review and revise mediation letter brief after edits by Beth Terrell	1.00	\$ 775.00	\$ 775.00
9/19/2016	Email to co-counsel re: collection totals and categories	0.10	\$ 775.00	\$ 77.50
9/19/2016	Email to co-counsel re: clarifying email to opposing counsel about fee categories	0.10	\$ 775.00	\$ 77.50
	Complete revising mediation letter brief after edits by Beth Terrell	2.50	\$ 775.00	\$ 1,937.50
9/20/2016	Email to co-counsel re: questions about fee categories in VSI's latest production	0.10	\$ 775.00	\$ 77.50
	Review and compare collection totals in tabel 3c and table 4	0.20	\$ 775.00	\$ 155.00
	Email Blythe Chandler re: comparison of collection totals in tabel 3c and table 4	0.10	\$ 775.00	\$ 77.50
	Review email from Sean Hardy re: fee categories, and input into collection fee table analysis	0.20	\$ 775.00	\$ 155.00
9/22/2016	Initial review of mediation brief and exhibits	0.40	\$ 775.00	\$ 310.00

9/23/2016	Tel. call with Blythe Chandler re: analysis of mediation brief	0.10	\$ 775.00	\$ 77.50
	Begin researching and drafting memo analyzing defendants' mediation brief	3.00	\$ 775.00	\$ 2,325.00
9/24/2016	Continue researching and drafting memo analyzing defendants' of mediation brief	1.50	\$ 775.00	\$ 1,162.50
	Email to co-counsel re: memo analyzing defendants mediation brief	0.10		
9/26/2016	Email to co-counsel re: arbitration issues	0.10	\$ 775.00	\$ 77.50
	On-line research re proposed arbitration rule, 12 CFR 1040	0.30	\$ 775.00	\$ 232.50
	Complete drafting memo analyzing defendants mediation brief, including legal research and document analysis	4.00	\$ 775.00	\$ 3,100.00
	Email to co-counsel re: memo analyzing defendants mediation brief, including legal research and document analysis	0.10	\$ 775.00	\$ 77.50
		?		
9/27/2016	Review email and attachment from Blythe Chandler re: class fee totals and email questions to Blythe	0.20	\$ 775.00	\$ 155.00
	Tel. call from Blythe Chandler to discuss fee data compilation	0.30	\$ 775.00	\$ 232.50
9/30/2016	Tel. call with client Kevin Breazeale re: case status	0.20	\$ 775.00	\$ 155.00
10/14/2016	Review and revise opposition to motion to consolidate	1.20	\$ 775.00	\$ 930.00

	Email to co-counsel explaining revisions to opposition to motion to consolidate	0.10	\$ 775.00	\$ 77.50
	Review draft case management statement and email comments to Blythe Chandler	0.20	\$ 775.00	\$ 155.00
	Review and compile evidence regarding Thomas Jonsson's role in VSI and draft and email short memo to co-counsel re: adding him as a defendant	0.40	\$ 775.00	\$ 310.00
10/16/2016	Review and respond to email re: defendant's objections to filing second amended complaint	0.10	\$ 775.00	\$ 77.50
	Research regarding amending the complaint while interlocutory appeal is pending	0.70	\$ 775.00	\$ 542.50
10/18/2016	Email comments to co-counsel re: case management statement section on amending the complaint to add Thomas Jonsson	0.20	\$ 775.00	\$ 155.00
10/24/2016	Email to co-counsel re: questions about adding corporate defendants in motion for leave to file second amended complaint	0.10	\$ 775.00	\$ 77.50
	Reply to email from Blythe Chandler re: questions about adding corporate defendants in motion for leave to file second amended complaint	0.10	\$ 775.00	\$ 77.50
	Tel. call with Blythe Chandler re: issues for case management conference on	0.10	\$ 775.00	\$ 77.50
	Draft motion for leave to file Second Amended Complaint.	2.60	\$ 775.00	\$ 2,015.00
	Research re: recent cases in the 9th Circuit discussing Rule 15 factors to be considered in deciding whether to grant leave to file an amended complaint	0.30	\$ 775.00	\$ 232.50

10/24/2016	Research re: cases addressing conduct that will trigger individual liability for	0.40	\$ 775.00	\$ 310.00
	FDCPA violations, including looking for cases based on del Campo, Schwarm and			
	Alonso			
	Draft declaration in support of motion for leave to file amended complaint.	0.40	\$ 775.00	\$ 310.00
	Draft proposed order granting motion for leave to file amended complaint.	0.20	\$ 775.00	\$ 155.00
	Detailed email to co-counsel regarding motion for leave to file second amended	0.30	\$ 775.00	\$ 232.50
	complaint and draft email to opposing counsel asking for stipulation			
10/25/2016	Exchange emails with Blythe Chandler re: status of motion for leave to file second	0.10	\$ 775.00	\$ 77.50
	amended complaint and timing of filing			
	Telephonic status conference, starting at 2:30 pm, but court does not get on	0.90	\$ 775.00	\$ 697.50
	phone until 3:13 pm.			
	Review and respond to email from Blythe Chandler re: motion to amend and issue	0.20	\$ 775.00	\$ 155.00
	of T. Jonsson's "general counsel" status.			
10/26/2016	Email to co-counsel regarding Defendants' failure to file an answer.	0.10	\$ 775.00	\$ 77.50
	Revise motion to amend with section on appellate jurisdiction issues	1.30	\$ 775.00	\$ 1,007.50
	Review local rules to make tactical decisions regarding timing of filing motion for	0.10	\$ 775.00	\$ 77.50
	leave to amend			
	Email to co-counsel re: tactical decisions regarding timing of filing motion for	0.10	\$ 775.00	\$ 77.50
	leave to amend and revisions to motion			

	Review Blythe Chandler revisions to Motion for Leave to File Second Amended	0.40	\$ 775.00	\$ 310.00
	Complaint and send email describing issues with some of the changes.			
	Email to opposing counsel seeking consent to file a Second Amended Complaint,	0.20	\$ 775.00	\$ 155.00
	involving final review of complaint and motion for leave to amend			
	Review and respond to email from Sean Hardy re: proposed Second Amended	0.20	\$ 775.00	\$ 155.00
	Complaint, including search of complaint for all references to Thomas Jonsson.			
10/26/2016	Email to Blythe Chander, forwarding the latest version of all documents needed to	0.10	\$ 775.00	\$ 77.50
	file a motion for leave to file an amended complaint if defendants refuse to stipulate to filing			
11/1/2016	Revise motion to amend, Paul Arons declaration and Exhibit 2 to motion to amend	1.00	\$ 775.00	\$ 775.00
11/2/2016	Email to co-counsel re: scheduling depositions	0.10		
11/3/2016	Review prior discovery responses and revise Rule 30(b)(6) deposition notice to be served on defendants	1.20	\$ 775.00	\$ 930.00
11/4/2016	Complete revision of Rule 30(b)(6) deposition notice to be served on defendants and forward to co-counsel, with comments	0.20	\$ 775.00	\$ 155.00
	Review discovery responses to identify areas of potential dispute and to prepare for depositions and further discovery.	1.50	\$ 775.00	\$ 1,162.50
11/8/2016	Tel. call with Blythe Chander to discuss discovery document searches	0.20	\$ 775.00	\$ 155.00
	Review documents produced by NCG in May and July 2016 in connection with deposition preparation	1.70	\$ 775.00	\$ 1,317.50

11/15/2016	Review Defendants' Opposition to Motion to Amend	0.20	\$ 775.00	\$ 155.00
	In response to claim in motion to amend opposition that there is a scheduling order setting a deadline for moving to amend, review case files and read transcript of July 2015 hearing re: case scheduling issues	0.30	\$ 775.00	\$ 232.50
	Email to Blythe Chandler re:claim in motion to amend opposition that there is a scheduling order setting a deadline for moving to amend and dealing with Defendants' factual misrepresentation	0.20	\$ 775.00	\$ 155.00
	Review opposition motion and research factual claims regarding Thomas Jonsson	0.60	\$ 775.00	\$ 465.00
	bar membership and litigation against Mats Jonsson.			
11/16/2016	Tel. call with Blythe Chandler to discuss response to opposition to motion for leave to file Second Amended Complaint	0.20	\$ 775.00	\$ 155.00
11/16/2016	Continue drafting reply memorandum re: motion to amend for leave to file second amended complaint, including research and writing sections on jurisdiction, undue delay, Cruz and futility, misrepresentations by Defendants and prejudice	5.00	\$ 775.00	\$ 3,875.00
11/17/2016	Continue drafting reply memorandum re: motion to amend for leave to file second amended complaint, including research and writing sections on undue delay, jurisdiction and permissive joinder	1.90	\$ 775.00	\$ 1,472.50
	Continue drafting reply memorandum re: motion to amend for leave to file second amended complaint, including research and writing sections on joinder under Rule 19	0.80	\$ 775.00	\$ 620.00
11/19/2016	Draft reply memorandum in support of motion to file second amended complaint,	2.20	\$ 775.00	\$ 1,705.00

	including completing section on Rules 20 and 21, and reviewing and revising memorandum				
	Draft Declaration of Paul Arons in support of reply memorandum in support of motion to file second amended complaint, including reviewing exhibits and revising memorandum to conform to statements in exhibits.	1.80	\$ 775.00	\$	1,395.00
	Email to co-counsel re: reply memorandum, declaration and exhibits with comments	0.10	\$ 775.00	\$	77.50
11/20/2016	Review revisions to Rule 30(b)(6) notice for defendant NCG?	0.10	\$ 775.00	\$	77.50
	Email to co-counsel re: revisions to Rule 30(b)(6) notice for defendant NCG and to propose additional document production requests.	0.10	\$ 775.00	\$	77.50
12/3/2016	Email to Blythe Chandler re: deposition scheduling	0.10			
12/4/2016	Review file to prepare for hearing on motion to amend and begin drafting hearing outline.	0.40	\$ 775.00	\$	310.00
12/5/2016	Review and respond to email from Blythe Chandler re: deposition scheduling	0.10			
	Tel. call from Blythe Chandler re: deposition scheduling	0.10			
	Review court order denying motion to amend without prejudice	0.10	\$ 775.00	\$	77.50
12/5/2016	Email to co-counsel re: court order denying motion to amend without prejudice	0.10	\$ 775.00	\$	77.50
12/13/2016	Review email from Sean Hardy re: deposition scheduling and email co-counsel to	0.10	\$ 775.00	\$	77.50

	discuss issue				
12/15/2016	Email to opposing counsel to schedule depositions of VSI, NCG and Mats Jonsson	0.10	\$ 775.00	\$	77.50
12/20/2016	Review email from Sean Hardy re: deposition scheduling and forward comments to co-counsel	0.10	\$ 775.00	\$	77.50
12/31/2016	Emails to five class plaintiffs	0.20	\$ 775.00	\$	155.00
1/2/2017	Review and respond to Kevin Breazeale email issues	0.10	\$ 775.00	\$	77.50
	Create plaintiffs' deposition scheduling memo	0.10	\$ 775.00	\$	77.50
	Tel. call with Kevin Breazeale re: case status	0.40	\$ 775.00	\$	310.00
1/4/2017	Review and respond to emails from plaintiffs re: deposition scheduling	0.10	\$ 775.00	\$	77.50
1/6/2017	Tel. call with Nancy Morin re: case status	0.20	\$ 775.00	\$	155.00
	Email to Blythe Chandler re: deposition scheduling	0.10			
1/10/2017	Tel. call w/Blythe Chandler re: scheduling depositions for plaintiffs and defendants	0.10	\$ 775.00	\$	77.50
2/2/2017	Review and respond to email from Blythe Chandler re: scheduling plaintiffs' depositions and getting updated discovery responses from defendants	0.10	\$ 775.00	\$	77.50
	Tel. call with Blythe Chandler to discuss deposition preparation and scheduling	0.30	\$ 775.00	\$	232.50
2/3/2017	Review communications from plaintiffs re: deposition scheduling and outline	0.20	\$ 775.00	\$	155.00

	scheduling proposal				
2/3/2017	Review email from potential witness and respond with additional questions.	0.20	\$ 775.00	\$	155.00
2/5/2017	Email to Kevin Breazeale	0.10	\$ 775.00	\$	77.50
	Begin document review in preparation for corporate depositions	0.80	\$ 775.00	\$	620.00
2/6/2017	Review email from Sean Hardy re: filing answer and research effect of interlocutory appeal on obligation to file answer	0.50	\$ 775.00	\$	387.50
2/9/2017	Email to Blythe Chandler re: the scheduling of plaintiffs' depositions and other deposition issues	0.10	\$ 775.00	\$	77.50
	Review file and research Rule 30(b)(6) obligations and send email to Sean Hardy re: issues in upcoming depositions, including Rule 30(b)(6) designation, failure to file answer, plaintiffs' deposition scheduling and supplemental discovery responses	0.60	\$ 775.00	\$	465.00
2/10/2017	Review and respond to email from Blythe Chandler re: deposition outline and preparation	0.10	\$ 775.00	\$	77.50
	Review contracts produced by defendants, compile chart and forward results to co-counsel	2.30	\$ 775.00	\$	1,782.50
2/11/2017	Review document production from defendants including all periodic reports, contracts, form letter and other form documents	3.00	\$ 775.00	\$	2,325.00
2/12/2017	Review defendants' discovery responses in preparation for corporate depositions, including close review of class data tables	3.00	\$ 775.00	\$	2,325.00
2/13/2017	Review email from Sean Hardy and respond to co-counsel re: designated testifiers	0.10	\$ 775.00	\$	77.50

	Review email from Sean Hardy, review Smith answers, draft proposed response	1.20	\$ 775.00	\$ 930.00
	regarding default and filing and answer, and circulate to co-counsel for review			
	Tel. call from Mike Taitelman re: Rule 30(b)(6) deposition logistics	0.10	\$ 775.00	\$ 77.50
	Email to co-counsel re: tel. call from Mike Taitelman re: Rule 30(b)(6) deposition	0.10		
	logistics and changing deposition location.			
2/13/2017	Email to co-counsel re: changing Rule 30(b)(6) deposition location.	0.10		
	Email to Mike Taitelman declining his request to move the deposition location from	0.30	\$ 775.00	\$ 232.50
	Los Angeles to Orange County			
	Review and respond to email from Mike Taitelman regarding witness scheduling	0.10	\$ 775.00	\$ 77.50
	for VSI Rule 30(b)(6) deposition			
	Review defendants' discovery in preparation for VSI corporate depositions	3.00	\$ 775.00	\$ 2,325.00
2/14/2017	Review and respond to email from Mike Taitelman regarding the order of	0.10	\$ 775.00	\$ 77.50
	witnesses for the VSI corporate deposition/complete and send email to Sean			
	Hardy re: default judgment and discovery			
2/15/2017	Exchange multiple emails with Maria Hossington-Bingham re: VSI deposition	0.10	\$ 775.00	\$ 77.50
	preparation			
2/16/2017	Email to co-counsel re: possible asset and insurance question in upcoming VSI	0.10	\$ 775.00	\$ 77.50
	deposition			
2/17/2017	Review documents and prepare outline for VSI deposition	3.00	\$ 775.00	\$ 2,325.00

2/18/2017	Review supplemental discovery served February 17, 2017	0.80	\$ 775.00	\$ 620.00
	Email to co-counsel re: supplemental discovery served February 17, 2017	0.20	\$ 775.00	\$ 155.00
	Review documents and prepare outline for VSI deposition/email co-counsel re: specific documents	3.50	\$ 775.00	\$ 2,712.50
2/19/2017	Review documents and prepare outline for VSI deposition/email co-counsel re: specific documents	4.00	\$ 775.00	\$ 3,100.00
2/20/2017	Travel time to VSI depositions in Los Angeles 3.5, SJI to SeaTac; 3.5 SeaTac to LAX	7.00	\$ 775.00	\$ 5,425.00
	Preparation for VSI depositions with Beth Terrell	7.00	\$ 775.00	\$ 5,425.00
2/21/2017	Preparation for VSI depositions with Beth Terrell, Thomas Jonsson deponent	1.00	\$ 775.00	\$ 775.00
	VSI deposition, Thomas Jonsson deponent	7.50	\$ 775.00	\$ 5,812.50
2/22/2017	VSI depositions, Megan McClung, Kathy Boyd and James Noland, deponents	8.50	\$ 775.00	\$ 6,587.50
	Preparation for VSI deposition, Megan McClung, Kathy Boyd and James Noland, deponents	1.00	\$ 775.00	\$ 775.00
2/23/2017	Preparation for VSI depositions, Matts Jonsson, deponent	1.00	\$ 775.00	\$ 775.00
	Return from Los Angeles VSI depositions	8.00	\$ 775.00	\$ 6,200.00
2/24/2017	Email to Sean Hardy confirming the continuance of NCG deposition set for March	0.10	\$ 775.00	\$ 77.50

	8-10.				
2/25/2017	VSI depositions, Matts Jonsson, deponent	6.00	\$ 775.00	\$	4,650.00
2/26/2017	Review file and draft co-counsel meeting adgenda	0.40	\$ 775.00	\$	310.00
2/28/2017	Review and edit draft Case Management Conference Statement	0.20	\$ 775.00	\$	155.00
	Tel. call with Blythe Chandler re: edited draft Case Management Conference Statement and discovery issues	0.20	\$ 775.00	\$	155.00
	Tel. call with Blythe Chandler re: edited draft Case Management Conference Statement and discovery issues	0.10			
	Review and edit revised draft Case Management Conference Statement	0.10	\$ 775.00	\$	77.50
	Email edited revised draft Case Management Conference Statement with comments.	0.20			
3/1/2017	Review and respond to email from Blythe Chandler re: scheduling of plaintiffs' depositions.	0.10	\$ 775.00	\$	77.50
3/1/2017	Review emailed deposition notices and respond to opposing counsel re: scheduling	0.10	\$ 775.00	\$	77.50
	Review file and email Narisha Bonakdar	0.20	\$ 775.00	\$	155.00
	Research regarding plaintiffs' financial privacy right to refuse to disclose check writing and financial history	1.00	\$ 775.00	\$	775.00
3/2/2017	Review and respond to email from Blythe Chandler re: rescheduling of CMC conference and discovery issues	0.10	\$ 775.00	\$	77.50

3/3/2017	Review discovery produced by defendants for information regarding disputes and	0.50	\$ 775.00	\$ 387.50
	email discovery proposal on this issue to co-counsel.			
3/4/2017	Email to Sean Hardy re: upcoming plaintiffs' depositions	0.10	\$ 775.00	\$ 77.50
	Review depositions preparation videos available on Youtube for use of plaintiffs to prepare in upcoming depositions	0.60	\$ 775.00	\$ 465.00
	Draft email for Narisha Bonakdar	0.50	\$ 775.00	\$ 387.50
	Email to Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
	Draft email for Nancy Morin	0.20	\$ 775.00	\$ 155.00
	Draft email for Karen Solberg	0.20	\$ 775.00	\$ 155.00
3/6/2017	Review and respond to email from Maria Hosington-Bingham re: discovery tactics and proposed discovery	0.20	\$ 775.00	\$ 155.00
	Review and revise Third Request for Production of Documents drafted by Maria Hosington Bingham	0.10	\$ 775.00	\$ 77.50
	Email Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
3/8/2017	Review Maria Hosington discovery drafts and email comments re: additional corporate discovery.	0.10	\$ 775.00	\$ 77.50
3/8/2017	Review Noland, McClung and Boyd deposition transcripts to excerpt questions that witnesses were instructed not to answer	0.30	\$ 775.00	\$ 232.50
	Review discovery responses and email Sean Hardy re: production of additional documents and responses to Request for Production No. 4 and 28.	0.30	\$ 775.00	\$ 232.50

3/9/2017	Review CVS check report files produced by VSI on March 9, 2017; email report to co-counsel	0.10	\$ 775.00	\$ 77.50
	Review and respond to email from Sean Hardy re: document production and scheduling a time to meet and confer	0.10	\$ 775.00	\$ 77.50
	Review and annotate Megan McClung deposition transcript for improper objections and instructions not to answer; create log of improper attorney conduct	0.70	\$ 775.00	\$ 542.50
3/10/2017	Email to Narisha Bonakdar	0.10	\$ 775.00	\$ 77.50
	Email to Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
3/11/2017	Emails to opposing counsel and Kevin Breazeale re: postponing his deposition.	0.10	\$ 775.00	\$ 77.50
3/12/2017	Review and summarize Megan McClung deposition	1.30	\$ 775.00	\$ 1,007.50
3/13/2017	Tel. call with Maria Hosington-Bingham re: meet and confer.	0.10	\$ 775.00	\$ 77.50
	Meet and confer phone conference with Sean Hardy and Maria Hosington-Bingham	0.40	\$ 775.00	\$ 310.00
	Email confirming phone conference with Sean Hardy and Maria Hosington-Bingham	0.10	\$ 775.00	\$ 77.50
	Review and annotate Karen Boyd deposition	1.00	\$ 775.00	\$ 775.00
3/14/2017	Review and annotate James Noland deposition	1.10	\$ 775.00	\$ 852.50

3/16/2017	Review and summarize Thomas Jonsson deposition	1.00	\$ 775.00	\$ 775.00
3/17/2017	Review draft Joint Case Management Conference Statement, make comment and	0.20	\$ 775.00	\$ 155.00
	revisions and forward to Blythe Chandler with comments			
3/22/2017	Telephone deposition preparation with Nancy Morin.	2.00	\$ 775.00	\$ 1,550.00
3/26/2017	Review and summarize Mats Jonsson deposition	1.20	\$ 775.00	\$ 930.00
3/28/2017	Case Management Conference with court; discovery cut-off date extended	0.20	\$ 775.00	\$ 155.00
3/30/2017	Tel. call with Maria H-B re: discovery issues, upcoming depositions and	0.50	\$ 775.00	\$ 387.50
	responding to defendants' discovery to plaintiffs.			
3/31/2017	Review and forward client-provided documents to co-counsel for consideration of	0.30	\$ 775.00	\$ 232.50
	producing in response to discovery requests			
	Tel. call with Maria H-B re: preparing for the plaintiffs' depositions scheduled for	0.50	\$ 775.00	\$ 387.50
	April 4 and 5.			
4/2/2017	Travel from SJI to Sacramento for plaintiffs' depositions	6.00	\$ 775.00	\$ 4,650.00
	Review County binders produced by Defendants, up to Riverside County	1.00	\$ 775.00	\$ 775.00
	Travel time to Sacramento for Plaintiffs' depositions	6.00	\$ 775.00	\$ 4,650.00
	Review county binders produced by defendants, through Riverside County	1.00	\$ 775.00	\$ 775.00

4/3/2017	Review docs. and prepare for depositions with Maria HB	0.50	\$ 775.00	\$ 387.50
	Prepare Nancy Morin for deposition	2.80	\$ 775.00	\$ 2,170.00
	Prepare Karen Solberg for deposition	2.10	\$ 775.00	\$ 1,627.50
	Prepare Narisha Bonakdar for deposition	2.00	\$ 775.00	\$ 1,550.00
4/4/2017	Deposition of Karen Solberg	2.20	\$ 775.00	\$ 1,705.00
	Deposition of Nancy Morin	2.40	\$ 775.00	\$ 1,860.00
4/5/2017	Travel from Sacramento to SJI from plaintiffs' depositions	7.00	\$ 775.00	\$ 5,425.00
	Deposition of Narisha Bonakdar	2.60	\$ 775.00	\$ 2,015.00
4/6/2017	Review Narisha Bonakdar documents in connection with responding to Request for Production of Documents	0.40	\$ 775.00	\$ 310.00
	Review Nancy Morin documents in connection with responding to Request for Production of Documents	0.10	\$ 775.00	\$ 77.50
	Review and respond to emails from Maria HB in connection with Nancy Morin and Narisha Bonakdar documents in connection with responding to Request for Production of Documents	0.10	\$ 775.00	\$ 77.50
4/7/2017	Review and respond to email from Maria HB re: info. needed to respond to class representative discovery	0.10	\$ 775.00	\$ 77.50
	Email to Kevin Breazeale	0.10	\$ 775.00	\$ 77.50

4/11/2017	Review proposed response to Mats Jonsson interrogatories to plaintiffs	0.10	\$ 775.00	\$ 77.50
	Email to Maria HB re: proposed response to Mats Jonsson interrogatories to plaintiffs	0.10	\$ 775.00	\$ 77.50
	Tel. call with Maria HB re: plaintiffs' responses to defendants' interrogatories	0.20	\$ 775.00	\$ 155.00
	Review and edit plaintiff Narisha Bonakdar's responses to defendants' interrogatories	1.00	\$ 775.00	\$ 775.00
4/12/2017	Review and respond to email from Maria HB re: Kevin Vu interrogatory responses	0.10	\$ 775.00	\$ 77.50
	Tel. call with Maria HB re: draft responses to request for production of documents to Narisha Bonakdar.	0.10	\$ 775.00	\$ 77.50
	Revise and edit Narisha Bonakdar responses to request for production of documents.	1.10	\$ 775.00	\$ 852.50
4/13/2017	Review documents produced by Defendants in 2017 to assess validity of confidentiality designations and for overview of newly produced documents.	1.80	\$ 775.00	\$ 1,395.00
	Review stipulated protective order and send email to Sean Hardy to dispute confidentiality of documents produced by defendants in 2017.	0.30	\$ 775.00	\$ 232.50
	Email to co-counsel re: defendants' failure to properly produce documents with response.	0.10	\$ 775.00	\$ 77.50
	Review and edit final Narisha Bonakdar response to VSI Request for Production of Documents.	0.30	\$ 775.00	\$ 232.50

	Review and edit final Narisha Bonakdar response to VSI Interrogatories	0.20	\$ 775.00	\$ 155.00
	Review and edit final Narisha Bonakdar response to Mats Jonsson Interrogatories	0.20	\$ 775.00	\$ 155.00
4/13/2017	Review and respond to emails from Blythe Chandler re: preparing discovery responses.	0.10	\$ 775.00	\$ 77.50
	Review Defendants' 2017 discovery responses to analyze need for further discovery and identify issues in dispute.	2.50	\$ 775.00	\$ 1,937.50
	Email to Sean Hardy re: email production from Karen Boyd.	0.10	\$ 775.00	\$ 77.50
4/14/2017	Tel. call with Blythe Chandler re: responding to defendants' interrogatories/requests for production of documents to plaintiffs	0.30	\$ 775.00	\$ 232.50
	Exchange emails with Blythe Chandler re: responses to defendants' discovery to plaintiffs.	0.10	\$ 775.00	\$ 77.50
	Review plaintiffs' documents to be produced in response to Defendants' document production requests, and email Blythe Chandler about questions with a document	0.10	\$ 775.00	\$ 77.50
4/17/2017	Tel. call with Blythe Chandler re: discovery responses	0.20	\$ 775.00	\$ 155.00
	Tel. call with Blythe Chandler re: discovery objections	0.10	\$ 775.00	\$ 77.50
	Review and edit Kevin Vu responses to VSI interrogatories	0.30	\$ 775.00	\$ 232.50
	Review and edit Kevin Vu responses to VSI document production requests	0.40	\$ 775.00	\$ 310.00

	Review Kevin Vu responses to Mats Jonsson interrogatories	0.10	\$ 775.00	\$ 77.50
	Review Kevin Breazeale responses to Mats Jonsson, VSI and NCG discovery.	1.10	\$ 775.00	\$ 852.50
	Review and edit Nancy Morin VSI document production request.	0.30	\$ 775.00	\$ 232.50
	Review and edit Nancy Morin VSI interrogatories	0.20	\$ 775.00	\$ 155.00
	Review and edit Nancy Morin NCG interrogatories	0.10	\$ 775.00	\$ 77.50
4/17/2017	Review and edit Karen Solberg responses to VSI document production request.	0.30	\$ 775.00	\$ 232.50
	Review and edit Karen Solberg responses to VSI and NCG interrogatories.	0.20	\$ 775.00	\$ 155.00
	Review and edit Narisha Bonakdar responses to VSI and NCG interrogatories.	0.20	\$ 775.00	\$ 155.00
	Review and edit Narisha Bonakdar responses to VSI document production request	0.10	\$ 775.00	\$ 77.50
4/18/2017	Review and respond to Blythe Chandler email re: Plaintiffs' verifications.	0.10	\$ 775.00	\$ 77.50
	Draft email to plaintiffs re: reviewing and verifying interrogatory answers	0.10	\$ 775.00	\$ 77.50
4/20/2017	Tel. call with Maria HB re: scheduling Kevin Vu deposition	0.20	\$ 775.00	\$ 155.00

	Review emails and document production to prepare for meet and confer with Sean Hardy re: VSI doc. production	0.10	\$ 775.00	\$ 77.50
	Meet and confer with Sean Hardy re: VSI doc. production; VSI withdraws designation on most docs., but not all.	0.30	\$ 775.00	\$ 232.50
	Review and respond to email from Sean Hardy designating certain documents as confidential	0.20	\$ 775.00	\$ 155.00
4/21/2017	Email to co-counsel re: confidentiality of VSI deposition testimony	0.10	\$ 775.00	\$ 77.50
4/24/2017	Review and analyze discovery to date to determine further discovery needs	4.00	\$ 775.00	\$ 3,100.00
4/25/2017	Review and respond to email from Blythe Chandler re: Defendants' request for a 74 day extension of time to file reply brief in arbitration appeal	0.10	\$ 775.00	\$ 77.50
	Draft extended meet and confer letter re: outstanding discovery issues	2.50	\$ 775.00	\$ 1,937.50
4/25/2017	Email to co-counsel attaching and explaining extended meet and confer letter re: outstanding discovery issues	0.10	\$ 775.00	\$ 77.50
4/26/2017	Continue overall review of discovery to determine future discovery needs	0.80	\$ 775.00	\$ 620.00
4/27/2017	Email Beth Terrell re deposition scheduling	0.10		
	Review and respond to email from Beth Terrell re: possible TCPA claim, including	0.30	\$ 775.00	\$ 232.50
	Email to Maria HB re: deposition scheduling and discovery re: potential TCPA claim	0.10	\$ 775.00	\$ 77.50

	Respond to email from Maria HB re: deposition scheduling and discovery re: potential TCPA claim	0.10	\$ 775.00	\$ 77.50
	Tel. call from Blythe Chandler re: discovery issues and potential TCPA claim.	0.40	\$ 775.00	\$ 310.00
	Review NCG and Birch Grove Holdings insurance policies for TPCA exclusions	0.60	\$ 775.00	\$ 465.00
	Research insurance policy exclusions for TCPA claims in VSI policy	0.60	\$ 775.00	\$ 465.00
	Email to co-counsel re: insurance policy exclusions for TCPA claims in VSI policy	0.20	\$ 775.00	\$ 155.00
4/28/2017	Review class data produced in 2017 and email to co-counsel with excerpt of data showing phone calls and discussion of possible TCPA claim	0.20	\$ 775.00	\$ 155.00
5/1/2017	Review Blythe Chandler edits to draft meet and confer letter, research Rule 34 requirements and email comments	0.50	\$ 775.00	\$ 387.50
	Tel. call with Blythe Chandler and Maria HB re: changes to meet and confer letter.	0.20	\$ 775.00	\$ 155.00
	Research and draft revisions to meet and confer letter.	1.50	\$ 775.00	\$ 1,162.50
	Review and respond to email from Maria HB re: Interrogatory No. 20 re: class fee data/review class fee data	0.20	\$ 775.00	\$ 155.00
5/1/2017	Review Defendants discovery and draft final revisions to meet and confer letter.	0.20	\$ 775.00	\$ 155.00
	Email to Blythe Chandler and Maria HB with comments.			

5/3/2017	Review and respond to emails from Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
5/5/2017	Email to Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
	Review and respond to email from Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
	Review deposition transcripts of Nancy Morin, Karen Solberg and Narisha Bonakdar	0.90	\$ 775.00	\$ 697.50
	Email Maria HB re: deposition transcripts of Nancy Morin and Karen Solberg	0.10	\$ 775.00	\$ 77.50
5/8/2017	Draft fourth request for production of documents for defendants	1.40	\$ 775.00	\$ 1,085.00
	Email to co-counsel re: fourth request for production of documents for defendants	0.10	\$ 775.00	\$ 77.50
5/9/2017	Tel. all with Maria HB re: discovery issues	0.10	\$ 775.00	\$ 77.50
	Meet and confer with Sean Hardy and Maria HB re: defendants' discovery responses as outlined in May 2, 2017 letter.	0.40	\$ 775.00	\$ 310.00
	Email to Sean Hardy confirming meet and confer with Sean Hardy and Maria HB re: defendants' discovery responses as outlined in May 2, 2017 letter.	0.30	\$ 775.00	\$ 232.50
5/15/2017	Tel. call from Maria HB re: revisions to 4th Request for Production of Documents	0.40	\$ 775.00	\$ 310.00
5/23/2017	Tel. call with Beth Terrell re: case status	0.10		

6/12/2017	Review and respond to email from Maria HB re: scheduling issues	0.10		
	Review and respond to email from Maria HB re: further discovery needed	0.10	\$ 775.00	\$ 77.50
6/22/2017	Review VSI and NCG written response to 4th Request for Production of Documents	0.20	\$ 775.00	\$ 155.00
	Review Mats Johnson written response to 2nd Request for Production of Documents	0.10	\$ 775.00	\$ 77.50
	Review and make notes re: 6/20/17 documents produced by Defendants	1.00	\$ 775.00	\$ 775.00
6/23/2017	Email to co-counsel re: deposition scheduling and disputes in connection with 6/20/17 document production responses	0.20	\$ 775.00	\$ 155.00
6/26/2017	Draft meet and confer letter re: June 20, 2017 discovery responses	0.60	\$ 775.00	\$ 465.00
	Email to co-counsel re: meet and confer letter re: June 20, 2017 discovery responses	0.10	\$ 775.00	\$ 77.50
6/29/2017	Revise draft meet and confer letter re: June 20, 2017 document production and forward to co-counsel for review	0.10	\$ 775.00	\$ 77.50
	Review meet and confer letter re: June 20, 2017 document production by defendants and email to opposing counsel.	0.10	\$ 775.00	\$ 77.50
7/6/2017	Tel. call with Maria HB re: meet and confer with Sean Hardy and discovery scheduling issues	0.30	\$ 775.00	\$ 232.50
	Meet and confer phone conference with Sean Hardy and Maria HB re: VSI/Mats Jonsson document production responses	0.40	\$ 775.00	\$ 310.00

	Draft email confirming meet and confer phone conference with Sean Hardy and	0.20	\$ 775.00	\$ 155.00
	Maria HB re: VSI/Mats Jonsson document production responses/forward to Maria for review			
	Email to Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
	Email to Kevin Vu	0.10	\$ 775.00	\$ 77.50
7/7/2017	Research discoverability of tax returns and financial data as relevant to net worth discovery under 15 USC Sec. 1692k.	0.30	\$ 775.00	\$ 232.50
7/7/2017	Draft email to Sean Hardy re: discoverability of tax returns and financial data as relevant to net worth discovery under 15 USC Sec. 1692k/forward to co-counsel for review	0.30	\$ 775.00	\$ 232.50
	Email to co-counsel re: deposition scheduling and extending the discovery cut-off date.	0.10	\$ 775.00	\$ 77.50
7/10/2017	Review and respond to email from Maria HB re: district attorney depositions	0.10	\$ 775.00	\$ 77.50
7/11/2017	Email to Irv Ackelsberg re: Noerr Pennington issues	0.10	\$ 775.00	\$ 77.50
	Tel. call with Maria HB re: subpoenas to district attorneys	0.10	\$ 775.00	\$ 77.50
	Telephone call with Kevin Vu	0.20	\$ 775.00	\$ 155.00
7/14/2017	Review and edit draft of district attorney discovery request for documents, Rule 30(b)(6) deposition and cover letter.	0.40	\$ 775.00	\$ 310.00
7/24/2017	Email to Kevin Breazeale	0.30	\$ 775.00	\$ 232.50

	Email to Sean hardy re: Kevin Breazeale deposition scheduling	0.10	\$ 775.00	\$ 77.50
	Tel. call from Kevin Breazeale	0.20	\$ 775.00	\$ 155.00
8/1/2017	Tel. call with Kevin Breazeale	1.10	\$ 775.00	\$ 852.50
	Review and compile documents for Kevin Breazeale	0.60	\$ 775.00	\$ 465.00
8/2/2017	Email to Kevin Braezeale	0.40	\$ 775.00	\$ 310.00
	Review and respond to email from Kevin Breazeale	0.10	\$ 775.00	\$ 77.50
8/3/2017	Tel. call to Julia Reeves (Placer County) re: subpoenas to Placer County DA	0.30	\$ 775.00	\$ 232.50
	Email to co-counsel re: tel. call to Julia Reeves (Placer County) re: subpoenas to Placer County DA	0.10	\$ 775.00	\$ 77.50
8/21/2017	Review letter from Orange County DA re: objections to document subpoena	0.10	\$ 775.00	\$ 77.50
	Email to co-counsel re: Orange County objections and amended subpoenas to DAs	0.10	\$ 775.00	\$ 77.50
8/23/2017	Tel. call with Maria HB re: district attorney subpoena discovery status and serving amended subpoenas	0.40	\$ 775.00	\$ 310.00
	Email to Maria HB re: edits to notification to Sean Hardy that Kevin Vu and Kevin Breazeale are withdrawing as class reps.	0.10	\$ 775.00	\$ 77.50
8/28/2017	Review subpoena scheduling issues and email co-counsel re: amending	0.20	\$ 775.00	\$ 155.00

	deposition scheduling.				
	Tel. call w/Blythe Chandler re: Orange County depositions	0.10	\$ 775.00	\$	77.50
	Letter to Orange County District Attorney responding to objections to document	1.00	\$ 775.00	\$	775.00
	subpoena				
8/29/2017	Review and edit letter to Orange County District Attorney responding to objections to document subpoena	0.10	\$ 775.00	\$	77.50
9/1/2017	Review email from Maria HB re: difficulties scheduling district attorney depositions and respond	0.20	\$ 775.00	\$	155.00
9/5/2017	Tel. call from Maria HB re: deposition scheduling and district attorney document production	0.30	\$ 775.00	\$	232.50
	Initial review of documents produced by Placer and Orange County pursuant to subpoena	1.00	\$ 775.00	\$	775.00
9/6/2017	Review monthly activity reports and email to Ray Armstrong (Orange County) re: producing information re: actual PC 476a prosecutions	0.20	\$ 775.00	\$	155.00
	Tel. call with Ray Armstrong re: list of PC 476a prosecutions	0.20	\$ 775.00	\$	155.00
9/6/2017	Reveiw and respond to email from Ray Armstrong (Orange County DA) re: list of PC 476a suspects.	0.10	\$ 775.00	\$	77.50
9/7/2017	Conference with Deepak Gupta and co-counsel to prepare for hearing of appeal of motion to compel arbitration	1.50	\$ 775.00	\$	1,162.50
	Review email from Ray Armstrong (Orange County) and respond, including attaching protective order	0.20	\$ 775.00	\$	155.00

	Tel. call with Maria HB re: district attorney deposition scheduling and document production	0.30	\$ 775.00	\$ 232.50
	Draft letter to Sean Hardy re: Alameda/Placer depositions/email to co-counsel with comments.	0.20	\$ 775.00	\$ 155.00
9/9/2017	Review discovery documents produced in 2017 in preparation for upcoming depositions	2.00	\$ 775.00	\$ 1,550.00
9/11/2017	Confer with Beth Terrell and Maria HB in preparation for NCG depositions	2.00	\$ 775.00	\$ 1,550.00
9/13/2017	Review and respond to email from Maria HB re: potential depositions exhibits/locate and forward voice recording from Merced County district attorney	0.20	\$ 775.00	\$ 155.00
9/15/2017	Review list of PC 476a prosecutions from Orange County District Attorneys' office/quick compare with class list	0.20	\$ 775.00	\$ 155.00
	Email to Ray Armstrong re: list of PC 476a prosecutions from Orange County District Attorneys' office	0.10	\$ 775.00	\$ 77.50
9/18/2017	Review and respond to email from Maria HB re: documents needed for upcoming depositions	0.20	\$ 775.00	\$ 155.00
	Review list of persons charged with PC 476a violations in Orange County and email Ray Armstrong (OCDA) to dispute confidentiality designation	0.20	\$ 775.00	\$ 155.00
9/19/2017	Review and respond to email from Ray Armstrong (OCDA) re: confidentiality designations	0.10	\$ 775.00	\$ 77.50
	Review and respond to second email from Ray Armstrong (OCDA) re: confidentiality designations	0.10	\$ 775.00	\$ 77.50

	Begin outline of evidence needed in preparation for upcoming NCG depositions	1.00	\$ 775.00	\$ 775.00
9/21/2017	Tel. call with Beth Terrell and Maria HB re: NCG depositions	0.20	\$ 775.00	\$ 155.00
	Email to Beth Terrell and Maria HB re: NCG depositions and liability issues	0.10	\$ 775.00	\$ 77.50
9/23/2017	Prepare for VSI/NCG depositions	1.50	\$ 775.00	\$ 1,162.50
9/24/2017	Travel time to Costa Mesa for NCG depositions	7.00	\$ 775.00	\$ 5,425.00
	Review documents to prepare for NCG depositions	3.50	\$ 775.00	\$ 2,712.50
9/25/2017	Review documents to prepare for NCG depositions	2.00	\$ 775.00	\$ 1,550.00
	Review documents to prepare for Noland and Mats Jonsson depositions	1.70	\$ 775.00	\$ 1,317.50
	Thomas Jonsson deposition	3.00	\$ 775.00	\$ 2,325.00
	Karen Boyd deposition	1.50	\$ 775.00	\$ 1,162.50
9/26/2017	Prepare for Mats Johnson/NCG deposition	1.00	\$ 775.00	\$ 775.00
	Mats Johnson/NCG depositions	5.00	\$ 775.00	\$ 3,875.00
	Prepare documents and outline for James Noland deposition	1.00	\$ 775.00	\$ 775.00
	Megan McClung deposition	2.30	\$ 775.00	\$ 1,782.50

	James Noland deposition	4.20	\$ 775.00	\$ 3,255.00
	Review documents and organize for Mats Jonsson deposition	1.00	\$ 775.00	\$ 775.00
9/27/2017	Prepare for Mats Johnson/NCG deposition	1.00	\$ 775.00	\$ 775.00
9/28/2017	Return trip from depositions in Costa Mesa	8.00	\$ 775.00	\$ 6,200.00
9/30/2017	Emails with Maria HB re: district attorney discovery and depositions	0.10	\$ 775.00	\$ 77.50
10/2/2017	Initial review of Placer, Alameda and Orange Counties document production; correlate prosecutions with CS referrals	0.60	\$ 775.00	\$ 465.00
10/5/2017	Research casino markers	0.60	\$ 775.00	\$ 465.00
10/08/2017	Organize documents and prepare Placer County deposition outline	1.80	\$775.00/hr	\$ 1,395.00
10/09/2017	Travel from SJI to Roseville for Placer County DA Rule 30(b)(6) deposition	6.00	\$775.00/hr	\$ 4,650.00
10/09/2017	Initial review of Placer County charging documents	0.30	\$775.00/hr	\$ 232.50
10/09/2017	Organize documents and prepare Placer County deposition outline	0.70	\$775.00/hr	\$ 542.50
10/10/2017	Take Placer County Rule 30(b)(6) deposition	2.00	\$775.00/hr	\$ 1,550.00
10/10/2017	Prepare for Placer County Rule 30(b)(6) deposition	1.30	\$775.00/hr	\$ 1,007.50
10/10/2017	Travel from Roseville SJI for Placer County DA Rule 30(b)(6) deposition	6.00	\$775.00/hr	\$ 4,650.00
10/11/2017	Email co-counsel re: additional discovery related to casino "checks" to Global Payment Systems	0.10	\$775.00/hr	\$ 77.50
10/16/2017	Review Alameda County records to analyze likelihood of prosecution	0.90	\$775.00/hr	\$ 697.50
10/16/2017	Draft meet and confer email to Sean Hardy to dispute confidentiality designations	0.50	\$775.00/hr	\$ 387.50
10/16/2017	Conclude comprehensive review of document production in connection with disputing confidentiality designations	2.00	\$775.00/hr	\$ 1,550.00
10/17/2017	Email draft subpoena for Global Payments seeking account information and include discussion of issues relating to subpoena	0.20	\$775.00/hr	\$ 155.00

10/17/2017	Tel. call with potential witness	0.40	\$775.00/hr	\$	310.00
10/17/2017	Review Eligible Check Reports and draft subpoena for Global Payments seeking account information.	0.90	\$775.00/hr	\$	697.50
10/18/2017	Review and revise motion to amend.	0.90	\$775.00/hr	\$	697.50
10/19/2017	Tel. call from Ray Armstrong re: Eligible Bad Check reports	0.10	\$775.00/hr	\$	77.50
10/19/2017	Review VSI letter sent to potential witness	0.10	\$775.00/hr	\$	77.50
10/19/2017	Email to Eden Nordby re: California Public Record Act responses from various counties	0.10	\$775.00/hr	\$	77.50
10/19/2017	Review and respond to email from Ray Armstrong (Orange Co. DA) re: production of eligible check reports	0.10	\$775.00/hr	\$	77.50
10/19/2017	Draft additional revisions to proposed motion to amend complaint to add defendants	0.70	\$775.00/hr	\$	542.50
10/19/2017	Email to Ray Armstrong re: Orange County's failure to produce eligible bad check reports and proposing compromise solution	0.80	\$775.00/hr	\$	620.00
10/19/2017	Initial review of Riverside Public Records Act response	0.30	\$775.00/hr	\$	232.50
10/20/2017	Meet and confer with Sean Hardy re: confidentiality designations	0.50	\$775.00/hr	\$	387.50
10/20/2017	Conference call with Blythe Chandler and Beth Terrell re: litigation	0.30	\$775.00/hr	\$	232.50
10/20/2017	Review Noland deposition testimony for statements regarding collection agency and stop payment screening that were not previously produced.	0.40	\$775.00/hr	\$	310.00
10/20/2017	Email to Sean Hardy re: James Noland testimony that there are additional screening criteria not shown in the Jurisdiction Detail report.	0.40	\$775.00/hr	\$	310.00
10/21/2017	Review letter from Sean Hardy re: meeting and conferring about Plaintiffs' interrogatory answers and email comments to Blythe Chandler and Maria HB.	0.10	\$775.00/hr	\$	77.50
10/23/2017	Review email from Sean Hardy re: confidentiality designations	0.10	\$775.00/hr	\$	77.50
10/23/2017	Email to Maria HB re: Training Manual confidentiality dispute and pages of manual that are in issue.	0.10	\$775.00/hr	\$	77.50
10/23/2017	Review Training Manual for confidentiality dispute to determine which pages of manual are in issue.	0.40	\$775.00/hr	\$	310.00
10/24/2017	Email to Sean Hardy re: dedesignating Compliance Manual pages	0.10	\$775.00/hr	\$	77.50
10/24/2017	Review and select Riverside documents for deposition of Riverside DA	0.90	\$775.00/hr	\$	697.50

10/25/2017	Email to Maria HB and Blythe Chandler re: evidence that various merchants are having their checks handled by Certegy or Telecheck	0.10	\$775.00/hr	\$	77.50
10/25/2017	Phone call with Maria HB re: Sean Hardy's October 20, 2017 meet and confer letter re: Plaintiff's discovery objections	0.30	\$775.00/hr	\$	232.50
10/25/2017	Review Orange County pending check reports and attempt to correlate creditors and collection agencies	1.00	\$775.00/hr	\$	775.00
10/26/2017	Review Alameda and Riverside County documents for possible deposition use	0.60	\$775.00/hr	\$	465.00
10/26/2017	Compare check writers listed on pending check reports with check writers in class list to determine merchant identity of checks submitted by collection agency.	0.80	\$775.00/hr	\$	620.00
10/26/2017	Review Orange County document production and select documents for possible deposition use	1.50	\$775.00/hr	\$	1,162.50
10/27/2017	Email to Sean Hardy re: his meet and confer letter and our response	0.10	\$775.00/hr	\$	77.50
10/27/2017	Review Sean Hardy's 24-page meet and confer letter regarding Plaintiffs' discovery responses, and Maria HB draft response. Edit draft response and forward to Maria HB.	3.00	\$775.00/hr	\$	2,325.00
10/28/2017	Review and select documents for possible exhibits in district attorney depositions	2.00	\$775.00/hr	\$	1,550.00
10/28/2017	Email to Catherine Cobol re: missing contract	0.10	\$775.00/hr	\$	77.50
10/28/2017	Paralegal - copy and organize documents for possible deposition exhibits	3.50	\$100.00/hr	\$	350.00
10/29/2017	Review and select documents for possible exhibits in district attorney depositions	1.50	\$775.00/hr	\$	1,162.50
10/29/2017	Paralegal - copy and organize documents for possible deposition exhibits	3.00	\$100.00/hr	\$	300.00
10/30/2017	Prepare outline for Alameda County DA deposition	2.00	\$775.00/hr	\$	1,550.00
10/30/2017	Review and respond to email from Catherine Kobol re: "missing" Alameda contract	0.10	\$775.00/hr	\$	77.50
10/30/2017	Travel from SJI to Oakland for Alameda County DA deposition	7.50	\$775.00/hr	\$	5,812.50
10/31/2017	Further preparation for Alameda County DA deposition	0.50	\$775.00/hr	\$	387.50
10/31/2017	Deposition of Office of the Alameda County District Attorney pursuant to FRCP Rule 30(b)(6)	3.50	\$775.00/hr	\$	2,712.50
10/31/2017	Travel from Oakland to Riverside for deposition of Riverside County district attorney	4.30	\$775.00/hr	\$	3,332.50
11/01/2017	Travel from Riverside to Costa Mesa for deposition of Orange County district attorney	1.30	\$775.00/hr	\$	1,007.50

11/01/2017	Prepare for deposition of Riverside County District Attorney pursuant to FRCP 30(b)(6)	1.00	\$775.00/hr	\$ 775.00
11/01/2017	Take deposition of Riverside County District Attorney pursuant to FRCP 30(b)(6)	4.00	\$775.00/hr	\$ 3,100.00
11/02/2017	Review and refine outline for Orange County deposition	1.00	\$775.00/hr	\$ 775.00
11/02/2017	Deposition of Orange County DA	3.70	\$775.00/hr	\$ 2,867.50
11/03/2017	Review and edit meet and confer letter response drafted by Maria HB and Blythe Chandler	0.10	\$775.00/hr	\$ 77.50
11/03/2017	Tel. call with Maria HB to discuss how to address DA testimony that conflicts with the facts as stated by Defendants.	0.40	\$775.00/hr	\$ 310.00
11/03/2017	Travel from Costa Mesa to San Juan Island	9.00	\$775.00/hr	\$ 6,975.00
11/06/2017	Review emails to district attorneys previously produced by Defendants	0.30	\$775.00/hr	\$ 232.50
11/06/2017	Review prior Corrective Solutions testimony and begin drafting letter to Sean Hardy re: additional documents that DA's claim they received from Corrective Solutions as part of the intake process.	0.70	\$775.00/hr	\$ 542.50
11/06/2017	Email and phone call with Maria HB regarding discovery and meet and confer issues raised by defendants	0.10	\$775.00/hr	\$ 77.50
11/06/2017	Email to Natalie Lough, Riverside County DA, re: Eligible Bad Check Reports, requesting that these be produced unredacted	0.20	\$775.00/hr	\$ 155.00
11/06/2017	Research obligation to prepare for FRCP Rule 30(b)(6) deposition and begin outlining draft letter to district attorneys regarding claims by witnesses regarding the documentation they receive.	0.80	\$775.00/hr	\$ 620.00
11/07/2017	Email to Maria HB and Blythe Chandler re: requesting Eligible Check Reports from Defendants	0.20	\$775.00/hr	\$ 155.00
11/07/2017	Review prior discovery in connection with requesting Eligible Check Reports from Defendants	1.10	\$775.00/hr	\$ 852.50
11/08/2017	Letter to Sean Hardy re: failure to produce Eligible Check Reports and associated documents, and identification of check payees in class data	0.90	\$775.00/hr	\$ 697.50
11/09/2017	Review and summarize deposition of Placer County district attorney	1.20	\$775.00/hr	\$ 930.00
11/12/2017	Begin drafting supplemental responses to interrogatories to Nancy Morin	0.50	\$775.00/hr	\$ 387.50
11/21/2017	Draft revisions re: pending discovery to stipulation and order to extend discovery deadlines	0.10	\$775.00/hr	\$ 77.50
11/21/2017	Phone call with Maria HB re: upcoming meet and confer phone call.	0.20	\$775.00/hr	\$ 155.00

11/21/2017	Initial review and analysis of Eligible Check Reports produced by Riverside County DA	0.40	\$775.00/hr	\$	310.00
11/21/2017	Review discovery and meet and confer letters in preparation for meet and confer conference	0.30	\$775.00/hr	\$	232.50
11/21/2017	Meet and confer phone call with Sean Hardy and Maria HB	1.00	\$775.00/hr	\$	775.00
11/22/2017	Review and analyze Riverside County Eligible Check lists and compare to "suspects" on class list.	1.00	\$775.00/hr	\$	775.00
11/22/2017	Email to co-counsel re: database access and net worth expert testimony	0.10	\$775.00/hr	\$	77.50
11/22/2017	Review and respond to email from Maria HB re: database access and net worth expert testimony	0.10	\$775.00/hr	\$	77.50
11/24/2017	Review 11,221 pages of eligibility spreadsheets produced by Defendants on November 14, 2017	0.40	\$775.00/hr	\$	310.00
11/24/2017	Email Sean Hardy re: 11,221 pages of eligibility spreadsheets produced by Defendants on November 14, 2017	0.20	\$775.00/hr	\$	155.00
11/28/2017	Review and summarize Gerald Fineman deposition	1.20	\$775.00/hr	\$	930.00
11/28/2017	Phone call with Maria HB re: further discovery and completing supplemental discovery	0.70	\$775.00/hr	\$	542.50
11/29/2017	Draft Nancy Morin Supplemental Interrogatory Answers	1.00	\$775.00/hr	\$	775.00
11/29/2017	Review deposition transcript and draft meet and confer letter to Riverside DA re: deposition testimony and failure to produce alleged "documentation."	1.20	\$775.00/hr	\$	930.00
11/29/2017	Research new cases on individual liability under the FDCPA in connection with drafting Nancy Morin Supplemental Interrogatory Answers	0.70	\$775.00/hr	\$	542.50
11/29/2017	Email Anthony Giardano (Global Payments) re: request for extension of time to respond to subpoena	0.10	\$775.00/hr	\$	77.50
11/30/2017	Compare Placer County eligibility records with Access database to analyze whether Defendants are attempting to collect ineligible checks.	0.50	\$775.00/hr	\$	387.50
11/30/2017	Research regarding work product and contention interrogatories	0.20	\$775.00/hr	\$	155.00
11/30/2017	Complete initial draft of supplemental responses to VSI Interrogatories to Nancy Morin	2.00	\$775.00/hr	\$	1,550.00
11/30/2017	Complete initial draft of Nancy Morin supplemental responses to Mats Jonsson interrogatories	0.10	\$775.00/hr	\$	77.50
11/30/2017	Being drafting supplemental responses to VSI interrogatories to Nancy Morin	1.50	\$775.00/hr	\$	1,162.50

11/30/2017	Organize Access database to analyze whether Defendants are attempting to collect ineligible checks.	0.80	\$775.00/hr	\$	620.00
11/30/2017	Email to Maria HB regarding work product and contention interrogatories	0.10	\$775.00/hr	\$	77.50
12/01/2017	Review Maria HB edits to Nancy Morin Supplemental Response to VSI Interrogatories, research prior NCG discovery responses in Smith v. LLC, and edit responses accordingly.	0.30	\$775.00/hr	\$	232.50
12/03/2017	Summarize Demetra Lewis deposition	2.00	\$775.00/hr	\$	1,550.00
12/04/2017	Draft narrative summary of Orange County DA deposition	0.90	\$775.00/hr	\$	697.50
12/04/2017	Begin drafting supplemental responses to VSI interrogatories to Karen Solberg, including review of prior discovery responses from Defendants and review of class data to determine extent to which Defendants are violating Orange County contract	1.90	\$775.00/hr	\$	1,472.50
12/05/2017	Tel. call from Maria HB re: Sean Hardy request for extension of time to move to dispute confidentiality designation and related outstanding discovery issues with defendants.	0.10	\$775.00/hr	\$	77.50
12/05/2017	Review and edit Maria HB changes to Nancy Morin supplemental responses to VSI interrogatories	0.30	\$775.00/hr	\$	232.50
12/05/2017	Detailed review of possible witness records	0.30	\$775.00/hr	\$	232.50
12/05/2017	Review and respond to email from Sean Hardy re: extension of time and other unresolved discovery issues.	0.10	\$775.00/hr	\$	77.50
12/06/2017	Draft supplemental responses to Karen Solberg interrogatories from defendants.	1.10	\$775.00/hr	\$	852.50
12/09/2017	Draft deposition summary of Vern Pierson	1.00	\$775.00/hr	\$	775.00
12/12/2017	Review documents provided by Global Payment Systems in response to subpoena duces tecum	0.20	\$775.00/hr	\$	155.00
12/12/2017	Draft deposition summary of Nancy Anderson-El Dorado County DA Rule 30(b)(6) deposition	1.30	\$775.00/hr	\$	1,007.50
12/12/2017	Email to Anthony Giordano re: documents provided by Global Payment Systems in response to subpoena duces tecum	0.10	\$775.00/hr	\$	77.50
12/13/2017	Draft Narisha Bonakdar supplemental responses to VSI interrogatories, including review and analysis of data on Exhibit 33 to Jim Noland VSI deposition	1.40	\$775.00/hr	\$	1,085.00
12/13/2017	Review and respond to Anthony Giordano re: obtaining legible version of check writer agreements.	0.10	\$775.00/hr	\$	77.50
12/14/2017	Review letter motion from Sean Hardy re: confidentiality designations and begin research of issue	0.30	\$775.00/hr	\$	232.50

12/14/2017	Phone call with Maria HB re: letter motion from Sean Hardy re: confidentiality designations, discuss strategy and allocate work on response	0.30	\$775.00/hr	\$	232.50
12/15/2017	Draft Joint Submission section on confidentiality of training manuals	1.50	\$775.00/hr	\$	1,162.50
12/15/2017	Email to Maria HB re: resolution of the confidentiality of financial statements and other issues regarding the Joint Submission	0.10	\$775.00/hr	\$	77.50
12/15/2017	Email to Sean Hardy re: resolution of the confidentiality of financial statements.	0.10	\$775.00/hr	\$	77.50
12/15/2017	Lexis research for Joint Submission section on confidentiality of training manuals	2.00	\$775.00/hr	\$	1,550.00
12/15/2017	Lexis research re: confidentiality standards and the Joint Submission pursuant to Stipulated Protective Order.	1.40	\$775.00/hr	\$	1,085.00
12/15/2017	Review and respond to email from Maria HB regarding the Joint Submission	0.10	\$775.00/hr	\$	77.50
12/18/2017	Tel. call with Maria HB re: Global Payments data, outstanding discovery, confidentiality dispute and Case Management Conference	0.50	\$775.00/hr	\$	387.50
12/18/2017	Global Payments document production and class data. Compare and find anomalies between Global data and class data	0.70	\$775.00/hr	\$	542.50
12/18/2017	Email to Maria HB re: Global Payments document production and class data,	0.10	\$775.00/hr	\$	77.50
12/19/2017	Case Management Conference-court orders that Plaintiffs may move to amend; very long hold time for court to get on phone	0.90	\$775.00/hr	\$	697.50
12/19/2017	Begin drafting revisions to motion for leave to amend	0.80	\$775.00/hr	\$	620.00
12/19/2017	Email to Blythe Chandler and Maria HB re: VSI investigation	0.10	\$775.00/hr	\$	77.50
12/19/2017	Phone call with Blythe Chandler and Maria HB re: filing motion to amend	0.10	\$775.00/hr	\$	77.50
12/19/2017	Review email from Sean Hardy re: headings on zip code lists, review lists and send response requesting additional information	0.30	\$775.00/hr	\$	232.50
12/19/2017	Review and respond to 3rd email from Maria HB re: language to be used in proposed order regarding confidentiality dispute.	0.10	\$775.00/hr	\$	77.50
12/19/2017	Respond to further email from Maria HB re: proposed order regarding confidentiality dispute	0.10	\$775.00/hr	\$	77.50
12/19/2017	Review and respond to email from Maria HB re: proposed order on confidentiality dispute; suggest different language in order	0.10	\$775.00/hr	\$	77.50
12/20/2017	Review and edit joint letter re: confidentiality dispute, after changes by Sean Hardy	0.50	\$775.00/hr	\$	387.50

12/20/2017	Phone call with Maria HB re: changes in joint letter re: confidentiality dispute	0.10	\$775.00/hr	\$	77.50
12/20/2017	Complete drafting of revisions to motion for leave to file second amended complaint	0.90	\$775.00/hr	\$	697.50
12/20/2017	Email to Blythe Chandler and Maria HB re: edits to joint letter re: confidentiality dispute, after changes by Sean Hardy	0.10	\$775.00/hr	\$	77.50
12/24/2017	Email to Blythe Chandler and Maria HB regarding initial draft of Requests for Admissions	0.10	\$775.00/hr	\$	77.50
12/24/2017	Finish initial draft of Requests for Admissions	0.80	\$775.00/hr	\$	620.00
12/27/2017	Emails with co-counsel re: 9th Circuit decision on defendants' appeal of anti-SLAPP decision and motion to compel arbitration	0.10	\$775.00/hr	\$	77.50
12/27/2017	Email to co-counsel re: effect of 9th Circuit decision	0.20	\$775.00/hr	\$	155.00
12/27/2017	Draft interrogatory re: collection agency referrals	0.30	\$775.00/hr	\$	232.50
12/27/2017	Email to Blythe Chandler and Maria HB interrogatory re: collection agency referrals and requests for admissions	0.10	\$775.00/hr	\$	77.50
12/27/2017	Revise requests for admissions	0.60	\$775.00/hr	\$	465.00
12/27/2017	Review 9th Circuit decision on defendants' appeal of anti-SLAPP decision and motion to compel arbitration	0.30	\$775.00/hr	\$	232.50
12/29/2017	Phone call with Blythe Chandler RE requests for admission and interrogatories to be served on VSI and NCG.	0.50	\$775.00/hr	\$	387.50
01/01/2018	Draft meet and confer letter to Anthony Giordano (Global Payments) re: confidentiality and interpretation of documents produced.	0.50	\$775.00/hr	\$	387.50
01/01/2018	Email to co-counsel explaining meet and confer letter to Anthony Giordano (Global Payments) re: confidentiality and interpretation of documents produced.	0.20	\$775.00/hr	\$	155.00
01/01/2018	Review and respond to email from Maria HB re: supplemental responses to Requests for Production to Narisha Bonakdar, including retrieval and review of relevant emails with Sean Hardy.	0.10	\$775.00/hr	\$	77.50
01/02/2018	Email to Maria HB and Blythe Chandler re: new data and constructing a database. Review and respond to email from Maria HB on same issues	0.10	\$775.00/hr	\$	77.50
01/02/2018	Review and edit Opposition to Motion for Extension of Time to File Petition for Rehearing/email comments to co-counsel	0.10	\$775.00/hr	\$	77.50
01/02/2018	Email to Maria HB re: supplemental response to defendants' request for production of documents	0.10	\$775.00/hr	\$	77.50

01/02/2018	Email to Maria HB re: revisions to supplemental responses to request for production of documents to Narisha Bonadkar	0.10	\$775.00/hr	\$ 77.50
01/02/2018	Complete supplemental responses to request for production of documents to Narisha Bonadkar through No. 36 and email with comments to Maria HB.	0.20	\$775.00/hr	\$ 155.00
01/02/2018	Review revised class list 3a (listing payee and submitter)	0.60	\$775.00/hr	\$ 465.00
01/02/2018	Complete review and revisions to supplemental responses to request for production of documents to Narisha Bonadkar	1.10	\$775.00/hr	\$ 852.50
01/02/2018	Initial review of documents produced by VSI on 12/26/17, with focus on Colusa and Contra Costa counties	1.10	\$775.00/hr	\$ 852.50
01/02/2018	Review and edit supplemental document production response from Narisha Bonadkar	1.30	\$775.00/hr	\$ 1,007.50
01/05/2018	Review email from Maria HB re: Narisha Bonadkar supplemental document production responses and email Ms. Bonadkar	0.10	\$775.00/hr	\$ 77.50
01/08/2018	Review email from Beth Terrell re: discussion with Mike Taitelman and respond with details re: settlement considerations	0.20	\$775.00/hr	\$ 155.00
01/08/2018	Review financial data for AJS and related entities/search internet for updated data and email with comments to Beth Terrell and co-counsel	0.40	\$775.00/hr	\$ 310.00
01/08/2018	Review class data and email Maria HB re: various class data totals to be derived from database	0.20	\$775.00/hr	\$ 155.00
01/08/2018	Review and make comments on revised draft of motion for class certification.	1.70	\$775.00/hr	\$ 1,317.50
01/09/2018	Email to co-counsel re: review and comments on revised draft of motion for class certification, including review of documents and deposition testimony	0.10	\$775.00/hr	\$ 77.50
01/09/2018	Continued review and comments on revised draft of motion for class certification, including review of documents and deposition testimony	2.00	\$775.00/hr	\$ 1,550.00
01/09/2018	Emails with Blythe Chandler discussing class certification motion	0.30	\$775.00/hr	\$ 232.50
01/09/2018	Email to Maria HB and Blythe Chandler re: outstanding discovery requests for Defendants	0.10	\$775.00/hr	\$ 77.50
01/10/2018	Multiple emails with Maria HB re: confidentiality of Letter Schedules and Jurisdiction Detail Reports	0.20	\$775.00/hr	\$ 155.00

01/10/2018	Read Maria HB email re: de-designation of selected confidential documents, review documents and email response	0.30	\$775.00/hr	\$	232.50
01/10/2018	Review discovery issues raised by Maria HB and me with Sean Hardy and draft email to Mr. Hardy, listing issues and requesting a response	0.60	\$775.00/hr	\$	465.00
01/11/2018	Email to Blythe Chandler and co-counsel ref class cert. motion filing	0.10	\$775.00/hr	\$	77.50
01/11/2018	Review files transmitted by the Riverside County District Attorney, which turned out to be just Monthly Activity Reports, 2010-2014.	0.10	\$775.00/hr	\$	77.50
01/11/2018	Review and respond to emails from Maria HB and Blythe Chandler re: upcoming CMC	0.20	\$775.00/hr	\$	155.00
01/11/2018	Review emails and spreadsheets and James Noland testimony from 12/14/2017 production in response to email from Sean Hardy	0.30	\$775.00/hr	\$	232.50
01/11/2018	Review December 18, 2017 letter to Ivy Fitzpatrick and email her re: the files transmitted by the Riverside County District Attorney, which turned out to be just Monthly Activity Reports, 2010-2014.	0.30	\$775.00/hr	\$	232.50
01/11/2018	Email to Maria HB re: 12/14/2017 document production/	0.10	\$775.00/hr	\$	77.50
01/15/2018	Review opposition to Motion for Leave to Amend and make notes	1.00	\$775.00/hr	\$	775.00
01/16/2018	Telephone call with Maria HB re: CMC, case deadlines and expert data analysis for class certification purposes	0.50	\$775.00/hr	\$	387.50
01/16/2018	Email to Sean Hardy proposing a modification of scheduling order.	0.10	\$775.00/hr	\$	77.50
01/16/2018	Review and respond to email from Sean Hardy with a counter proposal regarding modification of scheduling order.	0.10	\$775.00/hr	\$	77.50
01/16/2018	Emails with Sean Hardy and Maria HB re: stipulation and order regarding filing deadlines for motion for class certification; review and revise proposed order	0.10	\$775.00/hr	\$	77.50
01/16/2018	Telephonic Case Management Conference regarding filing deadlines for motion for class certification	0.40	\$775.00/hr	\$	310.00
01/17/2018	Email to Blythe Chandler and Maria HB re: changes to proposed stipulation and order re: filing schedule for motion for class certification and email to opposing counsel	0.10	\$775.00/hr	\$	77.50
01/17/2018	Review email from Sean Hardy regarding missing discovery, review discovery requests and documents produced and draft response	0.60	\$775.00/hr	\$	465.00

01/17/2018	Review and revise proposed stipulation and order re: filing schedule for motion for class certification	0.10	\$775.00/hr	\$	77.50
01/19/2018	Email to Maria HB, discussing settlement and requesting damage totals	0.20	\$775.00/hr	\$	155.00
01/22/2018	Emails with Beth Terrell re: mediation scheduling	0.10			
01/23/2018	Review native format email files produced by Defendants and attempt to generate readable files; multiple attempts not successful.	0.80	\$775.00/hr	\$	620.00
01/23/2018	Review supplemental production of form letters from Santa Cruz and Siskiyou County and email Maria HB re: missing letters.	0.30	\$775.00/hr	\$	232.50
01/25/2018	Email to Maria HB re: arguing motion to amend	0.10			
01/25/2018	Review declaration in support of reply memorandum in support of motion to amend.	0.10	\$775.00/hr	\$	77.50
01/25/2018	Review, including case research, and edit reply memorandum re: plaintiffs' motion to amend.	0.60	\$775.00/hr	\$	465.00
02/05/2018	Review NCG and VSI responses to Requests for Admissions	0.10	\$775.00/hr	\$	77.50
02/05/2018	Review file and email Ivy Fitzpatrick regarding Gerald Fineman testimony and option of obtaining a declaration from him on the issue of check approval review	0.20	\$775.00/hr	\$	155.00
02/05/2018	Review NCG and VSI interrogatory answers	0.10	\$775.00/hr	\$	77.50
02/07/2018	Review, analyze and annotate new class data served by Defendants on 2/5/2018,	2.40	\$775.00/hr	\$	1,860.00
02/07/2018	Review Siskiyou and Santa Cruz form letters produced on 2/5/18 and email comments to co-counsel	0.10	\$775.00/hr	\$	77.50
02/07/2018	Email to co-counsel re: my review and analysis of new class data served by Defendants on 2/5/2018,	0.30	\$775.00/hr	\$	232.50
02/09/2018	Email to Anthony Giordino re: Global Payments testimony	0.10	\$775.00/hr	\$	77.50
02/13/2018	Review and summarize Kenneth Ryken (Alameda Co. DA) deposition	1.20	\$775.00/hr	\$	930.00
02/15/2018	Email to co-counsel re: draft declaration of Gerald Fineman for review by Riverside County District Attorney.	0.10	\$775.00/hr	\$	77.50
02/15/2018	Draft declaration of Gerald Fineman for review by Riverside County District Attorney, including review of relevant deposition testimony.	0.70	\$775.00/hr	\$	542.50
02/16/2018	Email co-counsel re: order and filings in VSI v. CFPB	0.10	\$775.00/hr	\$	77.50
02/16/2018	Review collection letter from TRS Recovery to Nancy Morin and email client	0.10	\$775.00/hr	\$	77.50
02/16/2018	Review order and filings in VSI v. CFPB	0.40	\$775.00/hr	\$	310.00

03/01/2018	Review court orders relating to denial of confidentiality and issuing order to show cause/email co-counsel re: orders	0.10	\$775.00/hr	\$	77.50
03/05/2018	Research and draft declaration for Global Payments to consider in lieu of deposition. Research includes review of Global Payments website, annual report, and VIP Preferred care information.	1.30	\$775.00/hr	\$	1,007.50
03/06/2018	Email to Anthony Giordino re: possible Global Payments declaration	0.20	\$775.00/hr	\$	155.00
03/06/2018	Email to Sean Hardy re: expanding the number of interrogatories that Plaintiffs may serve.	0.20	\$775.00/hr	\$	155.00
03/06/2018	Phone call with Anthony Giordino regarding possibility of Global Payments declaration	0.20	\$775.00/hr	\$	155.00
03/08/2018	Review case law regarding obligation of public entity to produce documents in its control, even if not in its possession, and email Sean Hardy to request that he produce filings in Crews v. Glenn County	0.30	\$775.00/hr	\$	232.50
03/09/2018	Review Defendants' response to Order to Show Cause re Sanctions	0.50	\$775.00/hr	\$	387.50
03/13/2018	Prepare for meet and confer phone call with Sean Hardy re: answers to additional interrogatories.	0.10	\$775.00/hr	\$	77.50
03/13/2018	Meet and confer phone call with Sean Hardy re: answers to additional interrogatories.	0.10	\$775.00/hr	\$	77.50
03/13/2018	Draft deposition summary - Mats Jonsson Rule 30(b)(6) deposition for NCG	1.70	\$775.00/hr	\$	1,317.50
04/06/2018	Review class data compilations in connection with formulating settlement proposals.	0.20	\$775.00/hr	\$	155.00
04/06/2018	Email to Blythe Chandlers with questions and comments re: class data compilations in connection with formulating settlement proposals.	0.10	\$775.00/hr	\$	77.50
04/09/2018	Draft settlement memorandum for upcoming mediation/transmit to co-counsel	0.90	\$775.00/hr	\$	697.50
04/09/2018	Conference call with Blythe, Beth and Maria HB re: mediation and settlement data	0.50	\$775.00/hr	\$	387.50
04/12/2018	Compile totals for various segments of the class period from Table 3c and email results to co-counsel	0.40	\$775.00/hr	\$	310.00
04/12/2018	Conference call with Jeff, Blythe and Maria HB re: class data	1.00	\$775.00/hr	\$	775.00
04/12/2018	Compile totals for current monthly average from Table 3c and email results to co-counsel	0.10	\$775.00/hr	\$	77.50
04/13/2018	Research collateral source rule cases	0.90	\$775.00/hr	\$	697.50

04/15/2018	Research and draft supplemental mediation letter brief, including case research and review of CFPB Consent Order and Motion to Compel	1.70	\$775.00/hr	\$	1,317.50
04/16/2018	Complete initial draft for supplemental mediation letter brief, including collateral source research and review of CFPB material	2.20	\$775.00/hr	\$	1,705.00
04/20/2018	Review changes to mediation statement and make revisions.	0.50	\$775.00/hr	\$	387.50
04/20/2018	Complete review changes to mediation statement, make revisions and transmit to co-counsel with comments regarding FDCPA coverage issues.	0.20	\$775.00/hr	\$	155.00
04/23/2018	Phone call to Blythe Chandler and Maria HB to discuss changes to mediation statement	0.10	\$775.00/hr	\$	77.50
04/23/2018	Review and edit final version of mediation letter brief.	0.40	\$775.00/hr	\$	310.00
04/26/2018	Review email from Blythe Chandler re: difference in damage calculations between us and VSI, review mediation briefs, and email response	0.20	\$775.00/hr	\$	155.00
04/26/2018	Review new data totals forwarded by Maria HB and compare to recalculated totals from Table 3c	0.40	\$775.00/hr	\$	310.00
04/26/2018	Phone call with Blythe Chandler and Maria HB re: new data totals forwarded by Maria HB, recalculated totals from Table 3c and reasons for discrepancies; Maria HB will contact me with updated data info.	0.30	\$775.00/hr	\$	232.50
04/27/2018	Phone call with Sean Hardy, Blythe Chandler and Maria HB re: class data calculations and discrepancies	0.40	\$775.00/hr	\$	310.00
04/29/2018	Meet with Beth Terrell and Blythe Chandler to prepare for mediation	0.50	\$775.00/hr	\$	387.50
04/29/2018	Travel time to Los Angeles for mediation	9.00	\$775.00/hr	\$	6,975.00
04/30/2018	Mediation	5.40	\$775.00/hr	\$	4,185.00
05/01/2018	Travel time - LAX to San Juan Island	8.00	\$775.00/hr	\$	6,200.00
05/11/2018	Research issue of "interrelated wrongful acts" on whether unlawful charges claim is related to deceptive language claim made by CFPB	1.00	\$775.00/hr	\$	775.00
05/11/2018	Email to co-counsel, attaching case notes, reL issue of "interrelated wrongful acts" on whether unlawful charges claim is related to deceptive language claim made by CFPB	0.20	\$775.00/hr	\$	155.00
05/19/2018	Draft actions to be taken in light of failure of mediation	0.70	\$775.00/hr	\$	542.50
05/21/2018	Review and respond to email from Beth Terrell re: planning litigation steps for summary judgment and trial.	0.10	\$775.00/hr	\$	77.50

05/25/2018	Review and edit opposition to motion to compel compliance with subpoena issued to the CFPB.	0.30	\$775.00/hr	\$	232.50
05/28/2018	Compile test database for purpose of locating potential witnesses who paid VSI	1.40	\$775.00/hr	\$	1,085.00
05/28/2018	Email to Anthony Giardino re: Rule 30(b)(6) deposition.	0.10	\$775.00/hr	\$	77.50
05/28/2018	Email to co-counsel re: possibility of suing 3rd party collectors.	0.20	\$775.00/hr	\$	155.00
05/30/2018	Review settlement offer letter and send revisions to co-counsel	0.20	\$775.00/hr	\$	155.00
05/30/2018	Review and respond to email from Maria HB re: letter requesting updated financial information.	0.10	\$775.00/hr	\$	77.50
05/31/2018	Review draft settlement demand, make revisions, and email to co-counsel with discussion of reasons for changes.	0.30	\$775.00/hr	\$	232.50
05/31/2018	Phone call with Maria HB re: settlement offer letter	0.10			
05/31/2018	Review and revise motion for class certification.	1.80	\$775.00/hr	\$	1,395.00
06/01/2018	Review and respond to email from Anthony Giordano re: Global Payments declaration and deposition	0.20	\$775.00/hr	\$	155.00
06/04/2018	Phone call to Karen Solberg	0.20	\$775.00/hr	\$	155.00
06/04/2018	Review and edit Declaration of Paul Arons in Support of Motion for Class Certification, email to co-counsel	0.20	\$775.00/hr	\$	155.00
06/04/2018	Tel. call to Maria HB re: class cert. motion	0.20	\$775.00/hr	\$	155.00
06/04/2018	Email to co-counsel re: motion to amend scheduling order to re-open discovery.	0.10	\$775.00/hr	\$	77.50
06/04/2018	Email to Karen Solberg	0.10	\$775.00/hr	\$	77.50
06/04/2018	Review and edit Memorandum in Support of Motion for Class Certification, email to co-counsel	0.20	\$775.00/hr	\$	155.00
06/05/2018	Review file and draft supplemental response of Karen Solberg to Interrogatory No. 13.	0.10	\$775.00/hr	\$	77.50
06/05/2018	Email to Blythe Chandler and Maria HB re: supplementing Karen Solberg discovery responses.	0.20	\$775.00/hr	\$	155.00
06/05/2018	Participate in import of class data to SQL database and receive instruction in constructing queries	3.00	\$775.00/hr	\$	2,325.00
06/06/2018	Complete initial draft of motion to amend scheduling order to reopen discovery.	1.90	\$775.00/hr	\$	1,472.50
06/07/2018	Revise and complete draft of motion to reopen discovery	0.80	\$775.00/hr	\$	620.00
06/08/2018	Tel. call to Karen Solberg re: amending interrogatory answer.	0.10	\$775.00/hr	\$	77.50
06/11/2018	Complete initial draft of written discovery to Karl Thomas Jonsson	0.60	\$775.00/hr	\$	465.00

06/14/2018	Review file and send email to Sean Hardy regarding stipulating to reopening discovery.	0.10	\$775.00/hr	\$	77.50
06/18/2018	Review and respond to email from Sean Hardy re: reopening discovery	0.10	\$775.00/hr	\$	77.50
06/18/2018	Review and respond to email from Sean Hardy regarding reopening discovery.	0.10	\$775.00/hr	\$	77.50
06/18/2018	Reform, rewrite and revise draft motion to reopen discovery to meet letter brief standards.	1.20	\$775.00/hr	\$	-
06/19/2018	Revision and final drafting of Plaintiffs' Motion to Amend Scheduling Order to Reopen Discovery	1.00	\$775.00/hr	\$	775.00
06/19/2018	Draft declaration in support of Plaintiffs' Motion to Amend Scheduling Order to Reopen Discovery	0.90	\$775.00/hr	\$	697.50
06/19/2018	Email to Blythe Chandler re: Motion and declaration in support of Plaintiffs' Motion to Amend Scheduling Order to Reopen Discovery	0.10	\$775.00/hr	\$	77.50
06/19/2018	Phone call with Sean Hardy to meet and confer on motion to reopen discovery/email results to Blythe	0.10	\$775.00/hr	\$	77.50
06/21/2018	Email to Blythe Chandler re: correcting Karen Solberg's written discovery responses	0.20	\$775.00/hr	\$	155.00
06/21/2018	Telephone call with Blythe Chandler re: Karen Solberg supplemental discovery responses	0.10	\$775.00/hr	\$	77.50
06/21/2018	Review and edit final versions of Motion to Reopen Discovery, supporting declaration and proposed order.	0.30	\$775.00/hr	\$	232.50
06/24/2018	Email to co-counsel re: contacting potential witnesses	0.10	\$775.00/hr	\$	77.50
06/25/2018	Review and email supplemental interrogatory responses to Karen Solberg, with instructions on review and signing.	0.10	\$775.00/hr	\$	77.50
06/25/2018	Review motions to dismiss and legislative history of AB 1022 and AB 2606.	1.00	\$775.00/hr	\$	775.00
06/25/2018	Email to co-counsel re: motions to dismiss and legislative history of AB 1022 and AB 2606.	0.10	\$775.00/hr	\$	77.50
06/26/2018	Review motions to dismiss filed by defendants pursuant to FRCP 12(b)(1), 12(b)(6) and 12(b)(7); compare to prior motions to dismiss filed in Smith v. LLC;P;	1.30	\$775.00/hr	\$	1,007.50
06/26/2018	Email to co-counsel re: issues relating to motions to dismiss filed by defendants pursuant to FRCP 12(b)(1), 12(b)(6) and 12(b)(7);	0.30	\$775.00/hr	\$	232.50
06/29/2018	Phone call with Blythe Chandler re: responding to motions to dismiss and serving supplemental discovery responses for Karen Solberg	0.20	\$775.00/hr	\$	155.00
06/29/2018	Review final version of Karen Solberg supplemental discovery responses and authorized Heather Brown to send	0.10	\$775.00/hr	\$	77.50

06/29/2018	Review list of class members and look up check and letter information to identify potential witnesses	1.20	\$775.00/hr	\$	930.00
06/29/2018	Begin researching and drafting opposition to motion to dismiss pursuant to FRCP 12(b)(7).	1.10	\$775.00/hr	\$	852.50
07/02/2018	Draft opposition to Rule 12(b)(7) motion, fact section	1.20	\$775.00/hr	\$	930.00
07/02/2018	Complete preliminary drafting to opposition to Rule 12(b)(7) motion to dismiss-fact section	2.00	\$775.00/hr	\$	1,550.00
07/03/2018	Investigate government status of El Dorado County Transit Authority	0.50	\$775.00/hr	\$	387.50
07/03/2018	Conference call with Deepak Gutpa, Blythe Chandler, Amanda Steiner and Danny Wilf-Townsend re: motions to dismiss and class certification	1.10	\$775.00/hr	\$	852.50
07/04/2018	Continue drafting opposition to Rule 12(b)(7) motion, focusing on legislative intent and statutory construction.	0.80	\$775.00/hr	\$	620.00
07/05/2018	Continue drafting opposition to Rule 12(b)(7) motion-Rule 19(a)(1)(A) section	2.20	\$775.00/hr	\$	1,705.00
07/05/2018	Continue drafting opposition to Rule 12(b)(7) motion-Rule 19(a)(1)(A) section	0.80	\$775.00/hr	\$	620.00
07/07/2018	Continue drafting opposition to Rule 12(b)(7) motion-complete initial draft and being to incorporate revisions	1.30	\$775.00/hr	\$	1,007.50
07/08/2018	Complete initial draft of opposition to Rule 12(b)(7) motion to dismiss, with revisions	1.00	\$775.00/hr	\$	775.00
07/08/2018	Review and begin drafting of reply memo in support of motion to amend scheduling order to reopen discovery	3.90	\$775.00/hr	\$	3,022.50
07/09/2018	Review deposition transcripts and compile evidence regarding personal nature of transactions	0.30	\$775.00/hr	\$	232.50
07/09/2018	Continue drafting reply memorandum in support of motion to amend scheduling order to reopen discovery	1.20	\$775.00/hr	\$	930.00
07/10/2018	Complete draft of reply memorandum in support of motion to amend scheduling order to reopen discovery	1.00	\$775.00/hr	\$	775.00
07/11/2018	Review legislative history re: Bad Check Diversion Act	0.50	\$775.00/hr	\$	387.50
07/12/2018	Review and respond to email from Danny Wilf-Townsend re: proof needed for injunctive relief.	0.10	\$775.00/hr	\$	77.50
07/12/2018	Review and respond to email from Danny Wilf-Townsend re: proof needed for injunctive relief for entire database, instead of just for class. This includes running searches on SQL Workbench	0.20	\$775.00/hr	\$	155.00

07/12/2018	Telephone call with Danny Wilf-Townsend re: proof needed for injunctive relief.	0.20	\$775.00/hr	\$	155.00
07/12/2018	Draft declaration of Paul Arons in support of motion to reopen discovery, including locating and redacting exhibits	1.10	\$775.00/hr	\$	852.50
07/12/2018	Tel. call to data consultant James Bergh	0.20	\$775.00/hr	\$	155.00
07/13/2018	Email to co-counsel class data that I compiled in as spreadsheet as a sample of people who paid on checks may years apart, including payment information, and explain the information.	0.10	\$775.00/hr	\$	77.50
07/13/2018	Revise reply memorandum in support of motion to reopen discovery to include reference to intake criteria and make other revisions	0.40	\$775.00/hr	\$	310.00
07/13/2018	Draft and revise supplemental declaration of Paul Arons in support of motion to reopen discovery, including research intake criteria and highlighting relevant deposition testimony	1.10	\$775.00/hr	\$	852.50
07/13/2018	Revisions to final version of reply memorandum in support of motion to reopen discovery and supporting declaration of Paul Arons	0.20	\$775.00/hr	\$	155.00
07/13/2018	Review class data and put together spreadsheet sample of people who paid on checks may years apart, including payment information.	1.00	\$775.00/hr	\$	775.00
07/13/2018	Research Magnum discovery rule in connection with possible Karen Solberg FDCPA SOL issue and review the dates on which she contacted me and was sent collection letters.	3.16	\$775.00/hr	\$	2,449.00
07/13/2018	Tel. call and email to Blythe Chandler re: Magnum discovery rule in connection with possible Karen Solberg FDCPA SOL issue Solberg letter dates.	0.10	\$775.00/hr	\$	77.50
07/14/2018	Email edited reply memorandum re: class certification to class counsel, with comments.	0.10	\$775.00/hr	\$	77.50
07/14/2018	Review and edit reply memorandum re: class certification, including compilation of class data	1.20	\$775.00/hr	\$	930.00
07/14/2018	Review email from Amanda Steiner re: phrasing of the CFPB issue and send proposed language.	0.30	\$775.00/hr	\$	232.50
07/14/2018	Draft supplemental declaration in support of motion for class certification.	1.20	\$775.00/hr	\$	930.00
07/16/2018	Review email from Blythe Chandler re: documents showing that VSI does not require DA approval of letter changes, locate documents, and forward to Blythe Chandler with comments.	0.20	\$775.00/hr	\$	155.00
07/16/2018	Review final changes in Declaration of Paul Arons, and review and suggest revision to Reply Memorandum in Support of Class Certification.	0.20	\$775.00/hr	\$	155.00
07/16/2018	Review and revise opposition to motion to dismiss per Rule 12(b)(6).	0.60	\$775.00/hr	\$	465.00

07/17/2018	Review data and draft supplemental declaration in opposition to 12(b)(6) motion to dismiss.	1.10	\$775.00/hr	\$	852.50
07/17/2018	Review and edit opposition to motion to dismiss pursuant to Rue 12(b)(7).	0.50	\$775.00/hr	\$	387.50
07/25/2018	Email Blythe Chandler and Beth Terrell re: objections to declaration of Paul Arons in support of motion to certify class.	0.10	\$775.00/hr	\$	77.50
07/25/2018	Review objections to declaration of Paul Arons in support of motion to certify class.	0.10	\$775.00/hr	\$	77.50
07/31/2018	Review class certification motion and make notes in preparation for hearing	1.40	\$775.00/hr	\$	1,085.00
08/01/2018	Review class data to generate list of potential witnesses	1.40	\$775.00/hr	\$	1,085.00
08/02/2018	Draft proposed email to selected class members to locate prospective witnesses	0.20	\$775.00/hr	\$	155.00
08/02/2018	Email to Blythe Chandler re: proposed email to selected class members to locate prospective witnesses	0.10	\$775.00/hr	\$	77.50
08/02/2018	Prepare of hearing on motion for class certification, including reviewing and organizing notes, and research bona fide error and mistakes of state law	2.00	\$775.00/hr	\$	1,550.00
08/03/2018	Discussion with Blythe Chandler re: class cert. motion and other pending motions set for hearing	0.20	\$775.00/hr	\$	155.00
08/05/2018	Review checkwriter spreadsheet compiled by Jim Bergh to sort for potential witnesses.	1.10	\$775.00/hr	\$	852.50
08/09/2018	Review Statement of Recent Decision filed by Defendants and email comments to co-counsel	0.20	\$775.00/hr	\$	155.00
08/16/2018	Email class representatives Karen Solbeg, Nancy Morin and Narisha Bonakdar	0.20	\$775.00/hr	\$	155.00
08/30/2018	Preliminary draft of declaration for potential witness	0.30	\$775.00/hr	\$	232.50
08/30/2018	Email potential witness re preliminary draft of declaration	0.10	\$775.00/hr	\$	77.50
08/30/2018	Phone call with potential witness (Dawna Hillman)	0.60	\$775.00/hr	\$	465.00
09/05/2018	Review and revise potential witness declaration	0.10	\$775.00/hr	\$	77.50
09/11/2018	Phone call with Blythe Chandler re: changing hearing date and discussion of likely issues in class certification motion	0.20	\$775.00/hr	\$	155.00
09/25/2018	Draft email to send to potential witnesses	0.50	\$775.00/hr	\$	387.50
09/26/2018	Review and respond to email to sent to potential witness	0.10	\$775.00/hr	\$	77.50
09/27/2018	Email draft preliminary declaration for potential witness	0.20	\$775.00/hr	\$	155.00
09/27/2018	Email Beth Terrell and Blythe Chandler re: phone call with potential witness	0.10	\$775.00/hr	\$	77.50
09/27/2018	Draft preliminary declaration for potential witness	0.30	\$775.00/hr	\$	232.50

09/27/2018	Phone call with potential witness	0.40	\$775.00/hr	\$	310.00
10/08/2018	Email to potential witness re: her revised declaration and remaining questions	0.20	\$775.00/hr	\$	155.00
10/08/2018	Review email from potential witness re: her declaration and make revisions	0.60	\$775.00/hr	\$	465.00
10/09/2018	Email to potential witness re: draft declaration for review and revisions	0.10	\$775.00/hr	\$	77.50
10/09/2018	Review potential witness check and payment data and make phone call	0.20	\$775.00/hr	\$	155.00
10/09/2018	Draft declaration of potential witness to send to witness for review and revisions	0.40	\$775.00/hr	\$	310.00
10/09/2018	Telephone call with potential witness re: statement of experiences with DA program	0.50	\$775.00/hr	\$	387.50
10/15/2018	Review and respond to email from Blythe Chandler re: preparation for class certification hearing/search for and send notes and thoughts re: class cert. issues.	0.10	\$775.00/hr	\$	77.50
10/18/2018	Review evidence and arguments and email Blythe Chandler re: FDCPA coverage issues raised in the motion to dismiss.	0.80	\$775.00/hr	\$	620.00
10/19/2018	Letter to potential witness re: reviewing and signing her declaration.	0.10	\$775.00/hr	\$	77.50
10/22/2018	Review filings and draft notes for class certification hearing preparation	0.70	\$775.00/hr	\$	542.50
10/26/2018	Meeting with Blythe Chandler and Beth Terrell for class certification hearing preparation	1.50	\$775.00/hr	\$	1,162.50
10/29/2018	Conference call with Danny from Gupta Wessler, Beth Terrell and Blythe Chandler in preparation for November 1 hearing on multiple motions	0.90	\$775.00/hr	\$	697.50
10/30/2018	Research and draft summary of FDCPA issues from Second Amended Complaint as relevant to motion for class certification	1.30	\$775.00/hr	\$	1,007.50
10/30/2018	Emails with Beth Terrell re: Jim Noland testimony in class certification motion	0.30	\$775.00/hr	\$	232.50
10/30/2018	Research and respond to emails from co-counsel re: various factual issues in class certification motion, including identifying and reviewing exhibits and deposition testimony	2.00	\$775.00/hr	\$	1,550.00
10/30/2018	Research and draft summary of class representative facts as relevant to motion for class certification in preparation for hearing	0.90	\$775.00/hr	\$	697.50
10/30/2018	Phone conference for hearing preparation for two motions to dismiss, for additional discovery and class certification	2.00	\$775.00/hr	\$	1,550.00
10/31/2018	Travel from FH to SF for hearing on multiple motions	9.50	\$775.00/hr	\$	7,362.50

11/01/2018	Review motions in preparation for hearing on motion for class certification, motions to dismiss pursuant to Rules 12(b)(1), (12(b)(6) and 12(b)(7), and motion to reopen discovery (including courtroom time waiting to be called of about 1.5 hours)	1.00	\$775.00/hr	\$ 775.00
11/01/2018	Hearing on motion for class certification, motions to dismiss pursuant to Rules 12(b)(1), (12(b)(6) and 12(b)(7), and motion to reopen discovery (including courtroom time waiting to be called of about 1.5 hours)	3.50	\$775.00/hr	\$ 2,712.50
11/01/2018	Travel from SF to FH for hearing on multiple motions	9.00	\$775.00/hr	\$ 6,975.00
11/02/2018	Exchange emails with co-counsel re: litigation response to Court's reluctance to certify CFPB class.	0.50	\$775.00/hr	\$ 387.50
11/02/2018	Email co-counsel re: research regarding the applicability of the Consumer Legal Remedies Act to unlawful check collection.	0.10	\$775.00/hr	\$ 77.50
11/02/2018	Email co-counsel re: finding additional plaintiffs.	0.20	\$775.00/hr	\$ 155.00
11/02/2018	Research regarding the applicability of the Consumer Legal Remedies Act to unlawful check collection.	1.20	\$775.00/hr	\$ 930.00
11/03/2018	Phone call with potential witness re: participation as class representative	0.20	\$775.00/hr	\$ 155.00
11/03/2018	Review class data tables and email Jim Bergh to prepare for generation of new class list data compilation.	0.20	\$775.00/hr	\$ 155.00
11/03/2018	Email to Beth Terrell, Blythe Chandler re: call with potential witness	0.20	\$775.00/hr	\$ 155.00
11/03/2018	Research and compile Sue Hammond facts from class data.	0.20	\$775.00/hr	\$ 155.00
11/03/2018	Phone call with Blythe Chandler re: how to handle post-CFPB Class group	0.40	\$775.00/hr	\$ 310.00
11/04/2018	Email to Beth Terrell and Blythe Chandler re: potential class witness	0.10	\$775.00/hr	\$ 77.50
11/04/2018	Phone call with potential witness	0.30	\$775.00/hr	\$ 232.50
11/04/2018	Research and compile VSI data for potential witness	0.40	\$775.00/hr	\$ 310.00
11/05/2018	Tel. call with potential witness	0.10	\$775.00/hr	\$ 77.50
11/05/2018	Phone call with Blythe Chandler re: CMC Statement	0.20	\$775.00/hr	\$ 155.00
11/06/2018	Review proposed class notice draft	0.40	\$775.00/hr	\$ 310.00
11/06/2018	Review and edit draft Case Management Conference Statement	0.20	\$775.00/hr	\$ 155.00
11/06/2018	Email co-counsel re: edits to draft Case Management Conference Statement	0.10	\$775.00/hr	\$ 77.50

11/06/2018	Conference call with Blythe Chandler, Beth Terrell, Maria HB, Mike Taitelman and Sean Hardy re: discussion of post-CFPB class	0.20	\$775.00/hr	\$	155.00
11/07/2018	Phone call with Jim Bergh re: generating class list modified in light of likely class certification decision	0.30	\$775.00/hr	\$	232.50
11/07/2018	Revisions to class website notice and postcard notice	0.30	\$775.00/hr	\$	232.50
11/07/2018	Continued drafting of state court complaint	0.50	\$775.00/hr	\$	387.50
11/07/2018	Revisions to Case Management Conference Statement to reflect re-worked class definition.	0.30	\$775.00/hr	\$	232.50
11/07/2018	Review class data to determine percentage of class members with email addresses	0.30	\$775.00/hr	\$	232.50
11/07/2018	Review and edit long form class notice.	0.30	\$775.00/hr	\$	232.50
11/07/2018	Email to co-counsel re: edits to long form class notice.	0.10	\$775.00/hr	\$	77.50
11/07/2018	Review and revise postcard notice.	0.40	\$775.00/hr	\$	310.00
11/07/2018	Additional revisions to long-form notice.	0.10	\$775.00/hr	\$	77.50
11/07/2018	Call Blythe Chandler in response to email and discuss efficacy of class notice by email	0.20	\$775.00/hr	\$	155.00
11/08/2018	Phone call with Blythe Chandler re: revisions to Case Management Conference statement and discussion of Case Management Conference	0.20	\$775.00/hr	\$	155.00
11/08/2018	Review and draft revisions to Case Management Conference Statement/email to Blythe	0.40	\$775.00/hr	\$	310.00
11/14/2018	Email to co-counsel re:class data to determine additional class members to be noticed if non-fee paying class members added.	0.10	\$775.00/hr	\$	77.50
11/14/2018	Email to co-counsel re: problems with adding fraud sub-class	0.20	\$775.00/hr	\$	155.00
11/14/2018	Conference call with Mike Taitelman, Sean Hardy, Beth Terrell and Blythe Chandler re: CMC Order and addition of non-fee paying fraud sub-class	0.20	\$775.00/hr	\$	155.00
11/14/2018	Continued discussion with Beth and Blythe re: conference call with Mike Taitelman, Sean Hardy, Beth Terrell and Blythe Chandler re: CMC Order and addition of non-fee paying fraud sub-class	0.30	\$775.00/hr	\$	232.50
11/14/2018	Review class data to determine additional class members to be noticed if non-fee paying class members added.	0.80	\$775.00/hr	\$	620.00
11/16/2018	Review and analyze VSI answer and affirmative defenses	0.60	\$775.00/hr	\$	465.00
11/19/2018	Email to co-counsel summarizing affirmative defenses and need for discovery, including review and comparison or all defendants affirmative defenses to confirm that there are no significant differences.	0.70	\$775.00/hr	\$	542.50

11/26/2018	Email to co-counsel re: court order granting Global Payment Services discovery	0.10	\$775.00/hr	\$ 77.50
12/03/2018	Preliminary draft of 30(b)(6) topics, including review of past subpoenas and document production responses	1.50	\$775.00/hr	\$ 1,162.50
12/03/2018	Email to Maria HB and Blythe Chandler re: Global Payments Rule 30(b)(6) subpoena	0.10	\$775.00/hr	\$ 77.50
12/03/2018	Email to Anthony Giordano re: scheduling GPCS deposition	0.10	\$775.00/hr	\$ 77.50
12/04/2018	Review email from Blythe Chandler re: Global Payment Check Services, Inc. subpoena and email response.	0.10	\$775.00/hr	\$ 77.50
12/04/2018	Review and make changes to Blythe Chandler edits to Rule 30(b)(6) GPS deposition subpoena	0.20	\$775.00/hr	\$ 155.00
12/05/2018	Phone call with Maria HB re: Motion to Strike Affirmative Defenses, GPS deposition scheduling and case status	0.30	\$775.00/hr	\$ 232.50
12/05/2018	Draft motion to strike bona fide error affirmative defense.	0.70	\$775.00/hr	\$ 542.50
12/05/2018	Review and revise motion to strike affirmative defenses drafted by Maria HB	0.50	\$775.00/hr	\$ 387.50
12/06/2018	Draft revisions to revised Motion to Strike Affirmative Defenses	0.20	\$775.00/hr	\$ 155.00
12/06/2018	Emails to Amanda Steiner explaining revisions made to Motion to Strike Affirmative Defenses	0.10	\$775.00/hr	\$ 77.50
12/10/2018	Review and respond to email from Maria HB re: additional discovery.	0.10	\$775.00/hr	\$ 77.50
12/18/2018	Email to Anthony Giordano re: producing examples of data files transmitted to CorrectiveSolutions	0.20	\$775.00/hr	\$ 155.00
12/18/2018	Review and revise Global Payment Check Services, Inc. Rule 30(b)(6) subpoena, including review of all documents previously produced by GPSC.	0.70	\$775.00/hr	\$ 542.50
12/19/2018	Review postcard notice and long form notice and make revisions to long form notice	0.90	\$775.00/hr	\$ 697.50
01/02/2019	Email to Ryan Watstein data file examples and review and format files to send to Watstein	0.30	\$775.00/hr	\$ 232.50
01/02/2019	Email to Maria HB re: Global Payment Check Services subpoena and service	0.10	\$775.00/hr	\$ 77.50
01/02/2019	Review and revise deposition subpoena for Global Payment Check Services, Inc.	0.20	\$775.00/hr	\$ 155.00
01/02/2019	Review and suggest revision to Joint Letter re: Discovery Dispute	0.10	\$775.00/hr	\$ 77.50
01/02/2019	Phone call with Ryan Watstein re: Global Payment Check Services deposition and document production	0.40	\$775.00/hr	\$ 310.00

01/04/2019	Review email from Ryan Watstein re: document subpoena to GPSC, review documents and respond to email, attaching copy of document subpoena.	0.20	\$775.00/hr	\$	155.00
01/10/2019	Organize and review documents produced by Global Payments Check Services, Inc., in response to prior subpoenas.	1.10	\$775.00/hr	\$	852.50
01/10/2019	Phone call with Ryan Watstein re: providing data files sent to VSI	0.10	\$775.00/hr	\$	77.50
01/11/2019	Review and respond to email from Blythe Chandler re: revisions to discovery letter to be submitted to Court.	0.10	\$775.00/hr	\$	77.50
01/17/2019	Review data files and send email to Blythe Chandlere re: parameters for class list and damages calculations	0.20	\$775.00/hr	\$	155.00
01/17/2019	Phone call to Blythe Chandlere re: parameters for class list and damages calculations	0.40	\$775.00/hr	\$	310.00
01/17/2019	Begin draft of meet and confer letter to Sean Hardy re: stipulation or interrogatory on totals collected for class.	0.80	\$775.00/hr	\$	620.00
01/17/2019	Review and analyze categories of information in class data and email Jim Bergh re compiling class list and damages and restitution data.	1.00	\$775.00/hr	\$	775.00
01/21/2019	Review email from Blythe Chandler re: Mats and Tom Jonsson declarations filed in support of petition for Rule 23(f) review, review declarations, and send email regarding utility of declarations in summary judgment.	0.20	\$775.00/hr	\$	155.00
01/23/2019	Review email from Ryan Watstein re: another copy of the protective order, and send two follow-up emails	0.10	\$775.00/hr	\$	77.50
01/23/2019	Review email from Maria HB re: Lassen County denial of having a bad check program, research Lassen County DA check program on internet, call Lassen County DA's office, and report results to Maria HB and Blythe Chandler	0.50	\$775.00/hr	\$	387.50
01/25/2019	Phone call with Ryan Watstein re: providing copies of documents that GPCS previously produced/email compilation to Ryan Watstein	0.10	\$775.00/hr	\$	77.50
01/25/2019	Preparation for GPCS deposition	1.00	\$775.00/hr	\$	775.00
01/28/2019	Travel time, SJI to SEA, and SEA to ATL (actual time = 10+hours)	8.00	\$775.00/hr	\$	6,200.00
01/28/2019	Prepare for deposition of Global Payments Check Services, Inc.	1.00	\$775.00/hr	\$	775.00
01/29/2019	Deposition of Global Payments Check Services, Inc.	2.30	\$775.00/hr	\$	1,782.50

01/30/2019	Travel time, returning from Atlanta Global Payments deposition to San Juan Island. (Actual time-13.5 hours)	10.00	\$775.00/hr	\$ 7,750.00
01/30/2019	Email to co-counsel to discuss case status	0.10	\$775.00/hr	\$ 77.50
01/31/2019	Draft current task list and transmit to co-counsel	0.20	\$775.00/hr	\$ 155.00
01/31/2019	Draft supplemental interrogs to nail down actual damage amounts.	0.40	\$775.00/hr	\$ 310.00
01/31/2019	Review and respond to email from Beth Terrell re: fee categories to which defendants allocated money collected.	0.10		
01/31/2019	Conference call with Blythe Chandler, Maria HB and Beth Terrell re: case status, planning for summary judgment and trial, and class notice issues.	1.00	\$775.00/hr	\$ 775.00
02/01/2019	Review email from Mike Taitelman, review relevant insurance policies and send my comments to co-counsel.	0.20	\$775.00/hr	\$ 155.00
02/05/2019	Email to co-counsel re: comparison of newly provided data with January 2018 data, transmit comparison spreadsheet.	0.20	\$775.00/hr	\$ 155.00
02/05/2019	Review and analyze NCG class data provided by defendants. Compare newly provided data with January 2018 data, create comparison spreadsheet.	1.30	\$775.00/hr	\$ 1,007.50
02/05/2019	Review Expitia v. Mezzetti Fin. services and exchange emails with co-counsel re: submitting supplemental authority	0.20	\$775.00/hr	\$ 155.00
02/12/2019	Review and annotate GPCSI deposition and forward to co-counsel with comments	0.20	\$775.00/hr	\$ 155.00
02/12/2019	Review and summarize deposition of Keith Gardeck, Global Payments Check Services, Inc. designee fro Rule 30(b)(6) deposition.	1.50	\$775.00/hr	\$ 1,162.50
02/14/2019	Review email from Nancy Morin	0.20	\$775.00/hr	\$ 155.00
02/20/2019	Review class data for check and payment information for class members	0.80	\$775.00/hr	\$ 620.00
02/20/2019	Phone call to class member re: evidence related to collection attempt by CorrectiveSolutions.	0.20	\$775.00/hr	\$ 155.00
03/03/2019	Email to Blythe Chandler and Maria HB re:GPCSI confidentiality designations and draft letter disputing the designations.	0.10	\$775.00/hr	\$ 77.50
03/03/2019	Review GPCSI confidentiality designations and draft letter disputing the designations.	1.50	\$775.00/hr	\$ 1,162.50
03/13/2019	Review prior summary judgment filings in del Campo and related filings and forward to Maria HB in connection with upcoming summary judgment motion.	0.50	\$775.00/hr	\$ 387.50

03/13/2019	Phone call with Maria HB re: summary judgment motion tasks	0.30	\$775.00/hr	\$	232.50
03/15/2019	Review Gerald Fineman (Riverside County DA) declaration and email to Sean Hardy with cover letter.	0.10	\$775.00/hr	\$	77.50
03/15/2019	Draft Karen Solberg declaration in support of motion for summary judgment, including review of prior declaration and deposition transcript	1.20	\$775.00/hr	\$	930.00
03/16/2019	Review relevant documents and draft declaration of Nancy Morin in support of motion for summary judgment	0.50	\$775.00/hr	\$	387.50
03/17/2019	Complete draft of Nancy Morin declaration in support of motion for summary judgment	0.70	\$775.00/hr	\$	542.50
03/18/2019	Review deposition transcript and document and draft of Narisha Bonakdar declaration in support of motion for summary judgment	0.60	\$775.00/hr	\$	465.00
03/18/2019	Review and revise Maria HB edits to the declarations of Nancy Morin, Karen Solberg and Narisha Bonakdar in support of motion for summary judgment	0.20	\$775.00/hr	\$	155.00
03/19/2019	Phone call with Narisha Bonakdar re: her declaration in support of motion for summary judgment	0.20	\$775.00/hr	\$	155.00
03/20/2019	Revise declaration and email to Nancy Morin with comments	0.10	\$775.00/hr	\$	77.50
03/20/2019	Revise and transmit declarations of Nancy Morin and Karen Solberg	0.30	\$775.00/hr	\$	232.50
03/20/2019	Draft summary of each plaintiff's facts for use in summary judgment motion	0.70	\$775.00/hr	\$	542.50
03/20/2019	Phone call with Nancy Morin	0.20	\$775.00/hr	\$	155.00
03/24/2019	Phone call with Maria HB re: analyzing fee category questions	0.20	\$775.00/hr	\$	155.00
03/24/2019	Review and analyze class fee data and Jeff's methodology; email fee totals to Maria HB.	2.40	\$775.00/hr	\$	1,860.00
03/25/2019	Review depositions and deposition summaries for essential MSJ testimony	1.50	\$775.00/hr	\$	1,162.50
03/25/2019	Review stipulated protective order and meet and confer letter and email co-counsel re: expiration of Globla Payments confidentiality designations.	0.20	\$775.00/hr	\$	155.00
03/26/2019	Reivew, research and revise MSJ brief	1.70	\$775.00/hr	\$	1,317.50
03/26/2019	Review, research and revise 1692p MSJ argument	1.00	\$775.00/hr	\$	775.00
03/27/2019	Review and revise MSJ memo-fact section	0.80	\$775.00/hr	\$	620.00
03/27/2019	Review and revise MSJ memo-Fact section and legal argument, including legal research on debt collector liability and review of discovery	3.50	\$775.00/hr	\$	2,712.50

03/27/2019	Review court order re: discovery; email Maria HB re status: email Sean Hardy re: failure to timely serve discovery responses.	0.20	\$775.00/hr	\$	155.00
03/27/2019	Phone call with Beth Terrell and Marissa re: insurance coverage issues	0.60	\$775.00/hr	\$	465.00
03/28/2019	Tel. call with Maria HB re: revisions to MSJ draft	0.20	\$775.00/hr	\$	155.00
03/28/2019	Continued revisions to MSJ draft	1.70	\$775.00/hr	\$	1,317.50
03/28/2019	Review and revise draft of MSJ memo	4.70	\$775.00/hr	\$	3,642.50
03/29/2019	Review and annotate deposition testimony for use in MSJ memo, discuss 1692e(9) with Blythe, analyze Riverside County records to determine that VSI was ignoring directives from the DA the particula checkwriters were not eligible.	1.80	\$775.00/hr	\$	1,395.00
03/29/2019	Review DA depositions for potential MSJ evidence	0.60	\$775.00/hr	\$	465.00
03/29/2019	Review letter disputing confidentiality designations and related testimony and exhibits in preparation for meet and confer phone call with Ryan Watsein and Blythe Chandler	0.20	\$775.00/hr	\$	155.00
03/29/2019	Meet and confer phone call with Ryan Watsein and Blythe Chandler re: GPCSA confidentiality designations	0.40	\$775.00/hr	\$	310.00
03/29/2019	Draft email confirming results of meet and confer phone call with Ryan Watsein and Blythe Chandler re: GPCSA confidentiality designations	0.50	\$775.00/hr	\$	387.50
03/30/2019	Review and edit draft 2 of motion for summary judgment, including research for FDCPA cites	2.00	\$775.00/hr	\$	1,550.00
03/30/2019	Continue review and edit draft 2 of MSJ memo	1.80	\$775.00/hr	\$	1,395.00
03/31/2019	Review draft of MSJ memo and locate and compile evidentiary documents and testimony	2.10	\$775.00/hr	\$	1,627.50
03/31/2019	Continued locating evidence citations for summary judgment memorandum	1.20	\$775.00/hr	\$	930.00
04/01/2019	Review and edit motion for summary judgment; draft declaration portions needed for exhibits; modify Excel spreadsheet re: prosecution chances to use for exhibit; locate exhibits and testimony to use in motion	7.00	\$775.00/hr	\$	5,425.00
04/02/2019	Phone call with Marisa Jeffrey, Beth Terrell and Blythe Chandler re: insurance and settlement issues	0.30	\$775.00/hr	\$	232.50
04/03/2019	Conference call with Blythe Chandler, Marisa Jeffrey, Amy Stewart re: insurance coverage issues	0.60	\$775.00/hr	\$	465.00
04/04/2019	Review Defendants' March 25, 2019 discovery responses	0.50	\$775.00/hr	\$	387.50
04/04/2019	Email co-counsel re: Defendants' March 25, 2019 discovery responses and need to seek more responsive answers on BFE defense	0.40	\$775.00/hr	\$	310.00
04/06/2019	Revise Narisha Bonakdar declaration	0.20	\$775.00/hr	\$	155.00

04/30/2019	Review NCG/VSI exhibits and declarations filed in support of Defendants' Motion for Summary Judgment.	1.30	\$775.00/hr	\$	1,007.50
05/01/2019	Detailed review of Defendants' MSJ brief/outline and make notes re: legal arguments	2.50	\$775.00/hr	\$	1,937.50
05/01/2019	Conference call with Amanda Steiner, Maria HB, Blythe Chandler re: responding to Defendants' MSJ brief.	0.60	\$775.00/hr	\$	465.00
05/03/2019	Reiew and chart DA declaration evidence to see if it creates genuine issue of material fact.	0.50	\$775.00/hr	\$	387.50
05/03/2019	Research re: specificity of evidence needed to create genuine issue of material fact.	1.10	\$775.00/hr	\$	852.50
05/06/2019	Research and draft summary judgment opposition-bona fide fiduciary exemption issue	1.30	\$775.00/hr	\$	1,007.50
05/08/2019	Conference call with Blythe Chandler, Beth Terrell and Marisa (insurance counsul/consultant)	0.60	\$775.00/hr	\$	465.00
05/09/2019	Draft opposition memo on topic of 1692p compliance	2.50	\$775.00/hr	\$	1,937.50
05/09/2019	Reivew and revise oppostion section re: individual and company liability	3.00	\$775.00/hr	\$	2,325.00
05/10/2019	Draft response/opposition on 1692p exemption	2.90	\$775.00/hr	\$	2,247.50
05/10/2019	Email to Blythe Chandler and co-counsel re: substance of Jeff Munson supplemental declaration	0.20	\$775.00/hr	\$	155.00
05/13/2019	Complete revisions of opposition draft on bona fide fiduciary obligation and 1692p exemption.	2.50	\$775.00/hr	\$	1,937.50
05/23/2019	Review Riverside and El Dorado DA depositions for citations regarding lack of DA knowledge	1.10	\$775.00/hr	\$	852.50
05/23/2019	Phone call with Blythe Chandler re: evidence that district attorneys have no idea how the BCRP operates	0.20	\$775.00/hr	\$	155.00
05/24/2019	Review and revise reply memo re: summary judgment	3.80	\$775.00/hr	\$	2,945.00
05/27/2019	Review Noland testimony and provide cites to Blythe Chandler re: failure to screen for all intake criteria.	0.40	\$775.00/hr	\$	310.00
06/05/2019	Review and provide editing comments re: supplemental mediation submission.	0.20	\$775.00/hr	\$	155.00
06/10/2019	Review email from Jordan Martin re: class membe and search class data to review her checks and payment history.	0.20	\$775.00/hr	\$	155.00
06/10/2019	Review Defendants' Mediation Statement and analyze attached financial statements.	0.30	\$775.00/hr	\$	232.50
06/10/2019	Review and respond to Blythe Chandler emails re: Defendants' Mediation Statement and analyze attached financial statements.	0.20	\$775.00/hr	\$	155.00

06/11/2019	Discussions with Blythe Chandler and Beth Terrell re: mediation strategy and planning.	0.50	\$775.00/hr	\$	387.50
06/11/2019	Travel to Los Angeles for mediation.	9.50	\$775.00/hr	\$	7,362.50
06/12/2019	Los Angeles mediation	7.30	\$775.00/hr	\$	5,657.50
06/12/2019	Travel from Los Angeles mediation to San Juan Island	8.00	\$775.00/hr	\$	6,200.00
06/19/2019	Email to class representatives	0.10	\$775.00/hr	\$	77.50
06/20/2019	Review and revise motion to amend class certification and supporting declaration of Beth Terrell	0.30	\$775.00/hr	\$	232.50
08/01/2019	Email revisions to reply memo re: motion to clarify class certification order to co-counsel with comments re: revisions	0.10	\$775.00/hr	\$	77.50
08/01/2019	Review and revise reply memo re: motion to clarify class certification order.	0.30	\$775.00/hr	\$	232.50
09/23/2019	Phone preparation session with Blythe Chandler and Maria HB for summary judgment motionqqq	1.40	\$775.00/hr	\$	1,085.00
09/24/2019	Review summary judgment filings to prepare for phone conference re: moot court preparation for motion for summary judgment.	1.30	\$775.00/hr	\$	1,007.50
09/24/2019	Phone conference with Blythe Chandler, Maria HB, Beth Terrell and Marie Noel Appel re: moot court preparation for motion for summary judgment.	1.50	\$775.00/hr	\$	1,162.50
09/25/2019	Travel to San Francisco for hearing on cross-motions for summary judgment	8.00	\$775.00/hr	\$	6,200.00
09/26/2019	Hearing on cross-motions for summary judgment	2.30	\$775.00/hr	\$	1,782.50
09/26/2019	Continued hearing on cross-motions for summary judgment	0.70	\$775.00/hr	\$	542.50
09/26/2019	Travel from San Francisco for hearing on cross-motions for summary judgment	8.00	\$775.00/hr	\$	6,200.00
10/08/2019	Review court order re: additional exhibits	0.10	\$775.00/hr	\$	77.50
10/08/2019	Email to co-counsel re: court order re: additional exhibits/review letters produced in discovery	0.30	\$775.00/hr	\$	232.50
10/12/2019	Review and revise joint statement re: form letters	1.00	\$775.00/hr	\$	775.00
10/13/2019	Review and revise second draft of Joint Statement re: form letters	0.30	\$775.00/hr	\$	232.50
10/14/2019	Review and revise third draft of Joint Statement re: form letters	0.30	\$775.00/hr	\$	232.50
11/20/2019	Research cases and court rules re: filing motion for reconsideration	2.20	\$775.00/hr	\$	1,705.00
11/20/2019	Research cases and court rules re: filing motion for reconsideration	1.80	\$775.00/hr	\$	1,395.00
11/20/2019	Review, analyze and annotate court's ruling on summary judgment	1.10	\$775.00/hr	\$	852.50
11/21/2019	Conference call with Blythe Chandler, Amanda Steiner, Maria HB re: upcoming CMC and discovery issues	0.70	\$775.00/hr	\$	542.50

11/22/2019	Research alternative bases for fees charged by bad check program	2.00	\$775.00/hr	\$ 1,550.00
11/22/2019	Research California district attorney check collection programs and email co-counsel re: CPRA requests to be made	0.80	\$775.00/hr	\$ 620.00
11/25/2019	Review and edit CPRA request drafted by Maria HB.	0.10	\$775.00/hr	\$ 77.50
11/25/2019	Email Maria HB re: my edits to CPRA request drafted by Maria HB.	0.10	\$775.00/hr	\$ 77.50
11/25/2019	Conference call with Blythe Chandler, Maria HB, Mike Taitelman and Sean re: preparation of CMC Statement	0.50	\$775.00/hr	\$ 387.50
11/25/2019	Phone call with Blythe Chandler re: conference call and preparation of CMC Statement	0.40	\$775.00/hr	\$ 310.00
11/26/2019	Review and edit proposed CMC Statement and discovery drafted by Maria HB.	0.40	\$775.00/hr	\$ 310.00
11/26/2019	Phone call with Maria HB re: proposed CMC Statement and discovery drafted by Maria HB.	0.10	\$775.00/hr	\$ 77.50
12/03/2019	Email to co-counsel re: revisions to CMC Statement	0.10	\$775.00/hr	\$ 77.50
12/03/2019	Preliminary review of Defendants' additions to CMC Statement	0.40	\$775.00/hr	\$ 310.00
12/03/2019	Email to co-counsel re: preliminary review of Defendants' additions to CMC Statement	0.10	\$775.00/hr	\$ 77.50
12/03/2019	Phone call with Maria HB re: preliminary review of Defendants' additions to CMC Statement	0.20	\$775.00/hr	\$ 155.00
12/03/2019	Research and draft revisions to CMC Statement	2.40	\$775.00/hr	\$ 1,860.00
12/16/2019	Review and respond to email from Blythe Chandler re: Rule 30(b)(6) deposition notices to counties.	0.10	\$775.00/hr	\$ 77.50
12/17/2019	Review email from Defendants re: explanation for requesting records regarding purchasing agents, research applicable law and email response to co-counsel	0.30	\$775.00/hr	\$ 232.50
12/18/2019	Review and respond to email from Blythe Chandler re: subpoenas to counties and purchasing agent issue	0.10	\$775.00/hr	\$ 77.50
12/30/2019	Email class representatives re: case status and outlook.	0.20	\$775.00/hr	\$ 155.00
01/08/2020	Review and respond to emails from co-counsel re: settlement discussion.	0.10	\$775.00/hr	\$ 77.50
01/09/2020	Review Blythe Chandler letter re: VSI indemnity obligations and email comment.	0.10	\$775.00/hr	\$ 77.50
02/24/2020	Email to co-counsel re: deposition scheduling and exhibits	0.10	\$775.00/hr	\$ 77.50
02/24/2020	Email to co-counsel re: preparation for HNN deposition	0.10	\$775.00/hr	\$ 77.50

03/04/2020	Review county documents provided pursuant to subpoena duces tecum and make notes of relevant documents. Alameda through Monterrey.	1.50	\$775.00/hr	\$ 1,162.50
03/05/2020	Review county documents provided pursuant to subpoena duces tecum and make notes of relevant documents. Nevada through Tuolumne.	1.00	\$775.00/hr	\$ 775.00
03/05/2020	Complete draft of notes on subpoenaed county documents and email with comments to co-counsel	0.30	\$775.00/hr	\$ 232.50
03/25/2020	Review emailed letter to Sean Hardy and email comments to co-counsel	0.20	\$775.00/hr	\$ 155.00
03/31/2020	Conference call with co-counsel, Mike Taitelman and Sean re: county subpoenas	0.30	\$775.00/hr	\$ 232.50
06/19/2020	Email to Blythe Chandler re: editing of MSJ motion	0.20	\$775.00/hr	\$ 155.00
06/19/2020	Complete review and editing of first draft of MSJ motion	1.40	\$775.00/hr	\$ 1,085.00
06/19/2020	Email Blythe Chandler and co-counsel re: review and editing of first draft of MSJ motion	0.20	\$775.00/hr	\$ 155.00
06/20/2020	Review draft revised by Blythe Chandler and draft and forward notes on revisions.	0.60	\$775.00/hr	\$ 465.00
06/22/2020	Review discussion of decertification discussion and email outline of arguments.	0.50	\$775.00/hr	\$ 387.50
06/22/2020	Review and correct final versions of motion for summary judgment/opp. to VSI motions	0.70	\$775.00/hr	\$ 542.50
07/28/2020	Review class data and email Matt Wessler and Blythe Chandler re: potential new class reps.	0.10	\$775.00/hr	\$ 77.50
07/28/2020	Phone call with Matt Wessler, Blythe Chandler and Steffi Ostrowski re: filing response to VSI reply brief	0.50	\$775.00/hr	\$ 387.50
08/02/2020	Review Matt Wessler draft of reply memorandum and make edits and revisions	1.00	\$775.00/hr	\$ 775.00
09/09/2020	Phone call with Blythe Chandler and Beth Terrell re: Mike Taitelman settlement initiative	0.40	\$775.00/hr	\$ 310.00
10/15/2020	Court CMC	0.30	\$775.00/hr	\$ 232.50
10/23/2020	Review prior emails and send email to class representatives re: case status and settlement conference	0.20	\$775.00/hr	\$ 155.00
11/11/2020	Email to Blythe Chandler re: Settlement Conference Statement	0.20	\$775.00/hr	\$ 155.00
11/11/2020	Review settlement conference statement and make revisions	0.50	\$775.00/hr	\$ 387.50
11/19/2020	Pre-settlement conference phone call with Beth Terrell. Blythe Chandler and Mike Ram	0.40	\$775.00/hr	\$ 310.00
11/19/2020	Zoom settlement conference with Magistrate Judge Beeler	3.80	\$775.00/hr	\$ 2,945.00

11/30/2020	Phone call with Mats Jonsson, Thomas Jonsson, Blythe Chandler, Mike Taitelman and Sean re: Birch Grove, et al., financial statements	0.90	\$775.00/hr	\$	697.50
12/01/2020	Review and respond to email from Blythe Chandler re: communicating with class reps.	0.10	\$775.00/hr	\$	77.50
12/07/2020	Review, revise and comment on VSI Settlement Agreement draft put together by Blythe Chandler	0.70	\$775.00/hr	\$	542.50
12/15/2020	Review and edit long form website settlement notice and send to Blythe Chandler with comments	0.60	\$775.00/hr	\$	465.00
12/17/2020	Draft email to class representatives notifying them of settlement terms.	0.20	\$775.00/hr	\$	155.00
12/30/2020	Review and email co-counsel comments on defendants' proposed revisions to settlement documents	0.60	\$775.00/hr	\$	465.00
01/20/2021	Phone call with co-counsel and opposing counsel re: settlement agreement language	0.30	\$775.00/hr	\$	232.50
01/27/2021	Draft and send email to class representative explaining settlement proposal	0.40	\$775.00/hr	\$	310.00
01/27/2021	Review and annotate Memorandum in Support of Motion for Preliminary Approval and send notes to co-counsel	0.80	\$775.00/hr	\$	620.00
03/03/2021	Review Bernston Porter email re: cost of financial audit of defendants and forward to co-counsel with comments	0.20	\$775.00/hr	\$	155.00
03/04/2021	Draft email summarizing Tony Yip phone call and email to co-counsel with comments	0.10	\$775.00/hr	\$	77.50
03/04/2021	Review and respond to email from Blythe Chandler re: obtaining defendants' tax returns.	0.10	\$775.00/hr	\$	77.50
03/04/2021	Phone call with Adam Sheer (Miller Kaplan) re: financial audit of defendants	0.40	\$775.00/hr	\$	310.00
03/04/2021	Phone call with Tony Yip (Torrey Forensics) re: independent audit of defendants	0.40	\$775.00/hr	\$	310.00
03/08/2021	Review bid for forensic accounting and forward to co-counsel with comments	0.10	\$775.00/hr	\$	77.50
03/08/2021	Phone call with Blythe Chandler to discuss financial audit issue	0.10	\$775.00/hr	\$	77.50
03/08/2021	Review and respond to email from Amanda Steiner re: forensic accounting	0.10	\$775.00/hr	\$	77.50
03/11/2021	Review and edit supplemental brief on preliminary approval of class settlement/email comments to co-counsel	0.50	\$775.00/hr	\$	387.50
03/12/2021	Review files, draft declaration in support of supplemental brief in support of motion for approval of class notice, prepare exhibits and forward to Blythe Chandler with comments.	0.80	\$775.00/hr	\$	620.00
03/18/2021	Zoom hearing on motion for preliminary approval	0.60	\$775.00/hr	\$	465.00

SOLBERG V. VSI**Paul Arons Time Records**

03/19/2021	Review revisions to preliminary approval documents and send comments to co-counsel	0.10	\$775.00/hr	\$	77.50
03/22/2021	Review email from Blythe Chandler re: Defendants' revision to release, review and revise new release language, email co-counsel with comments	0.30	\$775.00/hr	\$	232.50
04/26/2021	Review postcard notice and email comments about edits to Blythe Chandler	0.20	\$775.00/hr	\$	155.00
Totals For Solberg v. VSI		#####			\$ 736,520.25