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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 DEEPAK GUPTA 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, Deepak Gupta, hereby declare under penalty of perjury as follows:

1. I am an attorney admitted to the Bar of the District of Columbia. I am the Founding Principal of Gupta Wessler PLLC, a public-interest law firm with offices in Washington, DC; Cambridge, Massachusetts; and San Francisco, California. I am also a Lecturer at Harvard Law School, where I currently teach a seminar on the forced arbitration of consumer and employee claims. I am an elected member of the American Law Institute and currently sit on the boards of directors or advisory boards of several nonprofit organizations and academic institutes, including the National Consumer Law Center; Lawyers' Committee for Civil Rights Under Law; the Biden Institute at the University of Delaware; the Civil Justice Research Initiative at the University of California, Berkeley; the Alliance for Justice; the Open Markets Institute, and the Institute for Consumer Antitrust Studies.

2. Over the past two decades, my litigation practice has been focused on Supreme Court, appellate, and complex litigation on behalf of consumers, workers, and communities injured by corporate or governmental wrongdoing. In addition to individual and class plaintiffs, I work with nonprofit public interest organizations; labor unions; state and local governments; and public officials. I have handled cases in every federal circuit, have testified multiple times before the U.S. Senate and the U.S. House of Representatives, and regularly appear as an oral advocate before the U.S. Supreme Court. Most recently, in March 2021, I argued and prevailed in *Ford Motor Co. v. Montana Eighth Judicial District*, in which the Supreme Court unanimously ruled that people injured by mass-market products can get access to justice where their injuries occurred, bucking a trend of anti-plaintiff personal-jurisdiction jurisprudence stretching back four decades. In 2009, I was invited by the Supreme Court to argue in support of a judgment left undefended by the Solicitor General. I am the first Asian-American to be appointed to argue by the Supreme Court. In the term ending in 2017, my firm was counsel of record for parties in three argued merits cases before the Supreme Court; I was lead counsel in two, prevailing in both. Before founding my firm in 2012, I helped

launch the new Consumer Financial Protection Bureau, as the first appellate lawyer hired under now-Senator Elizabeth Warren's leadership. I previously worked for seven years as an attorney at Public Citizen Litigation Group, where I founded and directed the Consumer Justice Project. I graduated from Georgetown University Law Center in 2002. My hourly rate for this litigation is \$775. This represents a significant reduction from my usual rate.

3. In collaboration with co-counsel, I helped develop the legal strategy in this case and oversaw or personally presented argument on key legal issues, working closely with my colleagues including Daniel Wilf-Townsend, Neil Sawhney, Rachel Bloomekatz, and Matthew Wessler, and Jonathan Taylor.

4. Daniel Wilf-Townsend is currently a Lecturer in Law and Harry A. Bigelow Teaching Fellow at the University of Chicago Law School. Before becoming a Bigelow Fellow, Danny was a litigator at Gupta Wessler from 2017-2020. In that role, Danny briefed and argued dozens of cases in courts around the country, at every level of the federal judiciary and in several state courts, focusing on representing plaintiffs and public-interest clients in appellate and complex litigation, with particular emphases on class actions and constitutional litigation.

5. Danny holds a B.A. from Yale College and J.D. from Yale Law School. After graduating from law school in 2015, he served as a law clerk to Judge Marsha Berzon on the U.S. Court of Appeals for the Ninth Circuit and Judge Jeffrey Meyer on the U.S. District Court for the District of Connecticut. Before that, Danny's legal experience included working at Gupta Wessler as a summer associate, working at the U.S. Department of Justice, the Public Defender Service for the District of Columbia, and in the chambers of Justice Carlos Moreno of the Supreme Court of California. Danny's hourly rate for this litigation is \$600. This represents a significant reduction from his usual rate.

6. Jonathan E. Taylor is a principal at Gupta Wessler. He joined the firm in its first year, 2012, following his clerkship with the Honorable Ronald Lee Gilman of the U.S. Court of

Appeals for the Sixth Circuit. At Gupta Wessler, Jon has presented oral argument before the U.S. Courts of Appeals for the First, Third, Seventh, Eighth, Ninth, Eleventh, and District of Columbia Circuits, as well as the Supreme Court of Alaska and the U.S. District Court for the District of Columbia and has been a principal author of dozens of briefs filed in the U.S. Supreme Court and all levels of the state and federal judiciaries. Before his judicial clerkship, Jon spent a year at Public Citizen Litigation Group on a Redstone Fellowship from Harvard Law School. Jon graduated cum laude from Harvard Law School in 2010. He is a member of the bar of the District of Columbia and the Supreme Court of the United States. His hourly rate for this litigation is \$650. This represents a significant reduction from his usual rate.

7. Matthew Wessler is a principal at Gupta Wessler, where he handles high-profile cases at all levels of both state and federal court. He also regularly appears before the U.S. Supreme Court. This past term, in *Intel Corp. v. Sulyma*, Matt argued and won a rare 9-0 victory for a class of workers seeking to hold companies accountable under ERISA for taking imprudent risks with retirement savings. The Wall Street Journal called the decision a “pretty significant” victory for “people’s ability to bring lawsuits over fiduciary breaches” under ERISA. Before joining the firm, Matt spent six years as a staff attorney at Public Justice, P.C. in Washington, DC, where he spearheaded the firm’s focus on Supreme Court litigation and earned national attention for taking the lead in cases involving ERISA, preemption, arbitration, and health care. Matt previously practiced at the Washington law firm of Williams & Connolly LLP and was a member of Obama for America’s sensitive litigation team, where he handled important election litigation on behalf of the presidential campaign. He clerked for the Honorable Richard L. Nygaard of the U.S. Court of Appeals for the Third Circuit and the Honorable William E. Smith of the U.S. District Court for the District of Rhode Island. Matt is a 2005 graduate of Cornell Law School. His hourly rate for this litigation is \$775. This represents a significant reduction from his usual rate.

8. Neil K. Sawhney is an associate at Gupta Wessler, based in the firm's San Francisco office. A Bay Area native, Neil was the firm's first Fellow in Appellate and Constitutional Litigation in 2015 to 2016, between his clerkships with the Honorable Marsha Berzon of the U.S. Court of Appeals for the Ninth Circuit and the Honorable Goodwin Liu, Associate Justice of the Supreme Court of California.

9. Neil graduated from Stanford Law School in 2014, where he spent two quarters in Stanford's Supreme Court Clinic and received the Thelton Henderson Prize for Outstanding Performance in Supreme Court Clinic Practice. During law school, Neil worked at the ACLU of Northern California, Arnold & Porter LLP, and the Office of the Prosecutor at the Special Tribunal for Lebanon in the Hague. He also served as a senior editor of the Stanford Law Review, a board member of Stanford's American Constitution Society chapter, and a co-founder of the Iraqi Legal Education Initiative. Neil's hourly rate for this litigation is \$600. This represents a significant reduction from his usual rate.

10. Rachel Bloomekatz holds a B.A. from Harvard College and a J.D. from the UCLA School of Law. After graduating from law school in 2008, she clerked for Justice Stephen Breyer on the U.S. Supreme Court, Judge Guido Calabresi on the U.S. Court of Appeals for the Second Circuit, and Chief Justice Margaret Marshall on the Massachusetts Supreme Judicial Court. Rachel was a principal at Gupta Wessler and is currently an appellate practitioner in Columbus, Ohio and an adjunct professor at the Ohio State Moritz College of Law. Before joining Gupta Wessler, Rachel was an associate in Jones Day's Issues and Appeals group, an Assistant Attorney General in Massachusetts, and a professor of U.S. law in Uruguay. Rachel's hourly rate for this litigation is \$650. This represents a significant reduction for her usual rate.

11. Steffi Ostrowski (J.D. Yale Law School, class of 2021) was a Summer Associate at Gupta Wessler, and her hourly rate for this litigation is \$350. Nabila Abdallah (B.A., Stanford Law School), Sara Evall (B.A., Duke University), and Stephanie Garlock (B.A., Harvard University) are all Paralegals who have worked or currently work at Gupta Wessler. Their

hourly rate for this litigation is \$200.

#### **TIMESHEETS AND REASONABLE TIME SPENT**

12. All attorneys at Gupta Wessler maintained time records reflecting the time spent on this matter. I reviewed the records of all time that all Gupta Wessler attorneys billed to this matter. I exercised billing judgment by deleting many time entries that were duplicative, administrative, or otherwise non-compensable. The remaining hours Gupta Wessler billed were properly and necessarily spent on the firm's core tasks and projects. The time records for the remaining hours spent by my firm and billed to this case through June 9, 2021 are attached hereto as **Exhibit A**. These fee records accurately reflect work necessarily performed in connection with this case.

13. Although Gupta Wessler's lodestar is current through June 9, 2021, its work on this matter is ongoing. If necessary, we will provide the Court with updated lodestar information in our reply brief.

#### **GUPTA WESSLER'S LODESTAR**

14. Over a period of five years, Gupta Wessler devoted a substantial amount of time and money toward handling briefing and argument on some of the key legal issues in this litigation. We undertook this representation on a wholly contingent basis. To date, we have received no payment for any of the work performed. My law firm risked non-payment if we were not successful.

15. The rates noted above are based on prevailing market rates for public interest attorneys and law firms in the forum that have attorneys and staff of comparable skill, experience, and qualifications. These rates are consistent with—and indeed lower than—the rates charged by comparable attorneys for similar work and complex litigation, including firms that regularly litigate complex civil matters of this kind. We have determined that the rates we plan to charge in this case are reasonable for attorneys of our experience, reputation and expertise practicing who litigate such matters in the forum.

16. I have calculated our attorney fees in this matter using my firm's current rates. The following chart calculates the lodestar for Gupta Wessler in this matter after exercising billing discretion.

Name	Law School Grad. Year	Hours	Hourly Rates	Total
Deepak Gupta	2002	255.43	\$775	\$197,958
Daniel Wilf-Townsend	2015	81.75	\$600	\$49,050
Jonathan Taylor	2010	6.6	\$650	\$4,290
Matthew Wessler	2005	12	\$775	\$9,300
Neil Sawhney	2014	171.77	\$600	\$103,062
Rachel Bloomekatz	2008	1.75	\$650	\$1,138
Steffi Ostrowski	2021	84.8	\$350	\$29,680
Nabila Abdallah	n/a	3	\$200	\$600
Sara Evall	n/a	8	\$200	\$1600
Stephanie Garlock	2020	25.59	\$200	\$5,118
<b>Total Lodestar</b>				<b>\$401,796</b>

17. Gupta Wessler's work on this litigation was performed on a wholly contingent basis. The firm devoted substantial resources to this matter, and we have received no payment for any of the hours of services performed or costs incurred. We did this, with no guarantee of repayment, because of the importance of this case for consumers targeted by the sort of debt-collection practices involved here and because of the importance of defeating a forced-arbitration clause under these circumstances.

#### **GUPTA WESSLER'S REASONABLE COSTS AND EXPENSES**

18. Gupta Wessler is seeking reimbursement of its reasonable out-of-pocket costs and expenses incurred in this matter. The items we have included in our costs and expenses are billed separately and are not included in my firm's lodestar. My firm's costs and expenses in this matter through May 23, 2021 total \$2,669.87. This sum includes transportation and

hotel fees for hearings, as well as other recoverable costs and expenses. For all of these costs, we received invoices and already have paid them. A true and correct copy of a list of those costs is attached as **Exhibit B**. In fact, my firm's costs were higher than this amount, but we have elected not to seek reimbursement for electronic research, in-house black-and-white copying and printing, and telephone charges.

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

Executed this 10th day of June 2021, in Washington, DC.

/s/ Deepak Gupta  
Deepak Gupta



# Exhibit A

<b>Gupta Wessler PLLC</b>					
<i>Solberg v. Victim Services, Inc.</i>					
Matter 1779-001					
Team Member	Date	Notes	Hours	Rate	Value
<b>Statement Professional: Nabila Abdallah</b>					
Abdallah, Nabila	9/1/2017	Researched, printed, and filed additional materials in the oral argument binder for Deepak.	3	\$200	\$600
		<b>Statement Professional: Nabila Abdallah</b>	<b>3</b>		<b>\$600</b>
<b>Statement Professional: Rachel Bloomekatz</b>					
Bloomekatz, Rachel	3/28/2016	Comm'n's w/Western Center on Law and Poverty regarding potential amicus support.	0.5	\$650	\$325
Bloomekatz, Rachel	4/19/2016	Review supp briefing and comments	1.25	\$650	\$813
		<b>Statement Professional: Rachel Bloomekatz</b>	<b>1.75</b>		<b>\$1,138</b>
<b>Statement Professional: Sara Evall</b>					
Evall, Sara	5/21/2021	Pull and organize timesheets, ensure all hours reported, start preparing documents for fee motion	1.5	\$200	\$300
Evall, Sara	6/9/2021	Prepare Gupta Declaration and accompanying exhibit for fee motion	6.5	\$200	\$1,300
		<b>Statement Professional: Sara Evall</b>	<b>8</b>		<b>\$1,600</b>
<b>Statement Professional: Stephanie Garlock</b>					
Garlock, Stephanie	11/24/2015	Preparation of extension motion for appeal	0.35	\$200	\$70
Garlock, Stephanie	1/12/2016	Cite checking, tagging, and formatting of response to motion to compel arbitration	3.33	\$200	\$666
Garlock, Stephanie	1/13/2016	Preparation of pro hac application for DG in Breazeale	0.22	\$200	\$44
Garlock, Stephanie	1/19/2016	Preparing and filing pro hac motion, obtaining accompanying certificate of good standing.	0.26	\$200	\$52
Garlock, Stephanie	1/28/2016	Cite checking and tagging for ninth circuit brief.	2.78	\$200	\$556
Garlock, Stephanie	1/28/2016	Final proofreading and filing of Breazeale 9th Circuit brief	1.2	\$200	\$240
Garlock, Stephanie	3/3/2016	Preparing argument binder for hearing on motion to compel arbitration	0.2	\$200	\$40
Garlock, Stephanie	4/19/2016	Cite checking and tagging supplemental brief for N.D. Ca.	2.13	\$200	\$426
Garlock, Stephanie	4/19/2016	Continued tagging of updated supplemental brief; reading for content and line edits	0.82	\$200	\$164
Garlock, Stephanie	4/20/2016	Updating tables and formatting for additional cites	0.37	\$200	\$74
Garlock, Stephanie	4/20/2016	Final proofing of supplemental brief in opposition to motion to compel arbitration	0.93	\$200	\$186
Garlock, Stephanie	7/15/2016	Cite checking supplemental brief	0.4	\$200	\$80
Garlock, Stephanie	7/15/2016	Final proofing and filing of supplemental brief	0.31	\$200	\$62
Garlock, Stephanie	4/6/2017	Begin research for statement for CA9 arbitration brief - begin to read through district court briefing	1.11	\$200	\$222
Garlock, Stephanie	4/7/2017	work on CA9 arbitration appeal statement	1.76	\$200	\$352
Garlock, Stephanie	4/8/2017	Work on drafting statement	1.5	\$200	\$300
Garlock, Stephanie	4/9/2017	Work on statement draft in CA9 arbitration appeal	1	\$200	\$200
Garlock, Stephanie	4/10/2017	Work on CA9 arbitration statement draft	1.5	\$200	\$300
Garlock, Stephanie	4/19/2017	Tag and format brief in arbitration appeal	3.5	\$200	\$700
Garlock, Stephanie	4/19/2017	Proof arbitration appeal brief	1.92	\$200	\$384
		<b>Statement Professional: Stephanie Garlock</b>	<b>25.59</b>		<b>\$5,118</b>
<b>Statement Professional: Deepak Gupta</b>					
Gupta, Deepak	10/8/2014	Review materials from co-counsel re potential case	1.5	\$775	\$1,163
Gupta, Deepak	10/9/2014	Review and comment on draft complaint from co-counsel	2	\$775	\$1,550
Gupta, Deepak	10/14/2014	Conference call re draft complaint and case strategy	0.5	\$775	\$388

Gupta, Deepak	12/1/2014	Final edits on press release and complaint	3	\$775	\$2,325
Gupta, Deepak	12/22/2015	Call with Neil and co-counsel (Paul Arons) re depositions	0.75	\$775	\$581
Gupta, Deepak	1/9/2016	Editing/drafting opposition to motion to compel arbitration	5.2	\$775	\$4,030
Gupta, Deepak	1/10/2016	Editing/drafting opposition to motion to compel arbitration	5.5	\$775	\$4,263
Gupta, Deepak	1/11/2016	Editing/drafting opposition to motion to compel arbitration	4	\$775	\$3,100
Gupta, Deepak	1/12/2016	Editing/drafting opposition to motion to compel arbitration	6.5	\$775	\$5,038
Gupta, Deepak	1/12/2016	Meeting with Jon to discuss mtn to compel arbitration	2.2	\$775	\$1,705
Gupta, Deepak	1/13/2016	Discussion with Neil re CA9 brief strategy	0.9	\$775	\$698
Gupta, Deepak	1/19/2016	Call with Neil and Blythe Chandler re CA9 brief	0.52	\$775	\$403
Gupta, Deepak	1/23/2016	Edit statement of the case for Ninth Circuit SLAPP brief	4.5	\$775	\$3,488
Gupta, Deepak	1/25/2016	Editing Ninth Circuit brief	3.2	\$775	\$2,480
Gupta, Deepak	1/26/2016	Edit SLAPP brief argument section	4	\$775	\$3,100
Gupta, Deepak	1/26/2016	Editing SLAPP brief (9th Cir)	3.3	\$775	\$2,558
Gupta, Deepak	1/26/2016	Discussed CA9 brief with Neil	0.23	\$775	\$178
Gupta, Deepak	1/27/2016	Editing and finalizing Ninth Circuit SLAPP appeal brief	6.2	\$775	\$4,805
Gupta, Deepak	1/28/2016	Finalized Breazeale CA9 brief	3.5	\$775	\$2,713
Gupta, Deepak	3/3/2016	Prepped for hearing on motion to compel arbitration with Neil	1.2	\$775	\$930
Gupta, Deepak	3/5/2016	Prep for motion to compel arbitration	3.2	\$775	\$2,480
Gupta, Deepak	3/4/2016	Prep for motion to compel arbitration	3	\$775	\$2,325
Gupta, Deepak	3/5/2016	Prep for motion to compel arbitration	1.75	\$775	\$1,356
Gupta, Deepak	3/6/2016	Prep for motion to compel arbitration	3	\$775	\$2,325
Gupta, Deepak	3/7/2016	Prep for motion to compel arbitration	3	\$775	\$2,325
Gupta, Deepak	3/8/2016	Prep for motion to compel arbitration	7.75	\$775	\$6,006
Gupta, Deepak	3/9/2016	Prep for and travel to oral argument on motion to compel arbitration	12	\$775	\$9,300
Gupta, Deepak	3/10/2016	Prep for and attend argument on motion to compel arbitration	10	\$775	\$7,750
Gupta, Deepak	3/23/2016	Meeting with Neil to discuss supplemental brief and potential amici	0.5	\$775	\$388
Gupta, Deepak	3/24/2016	Meeting with Paul Arons and Neil S re supplemental briefing strategy on arbitration motion	0.5	\$775	\$388
Gupta, Deepak	4/6/2016	Call with Neil and ACLU national re amicus brief	0.75	\$775	\$581
Gupta, Deepak	4/6/2016	Meeting with Neil re constitutional arguments	0.6	\$775	\$465
Gupta, Deepak	4/7/2016	Call with Neil and David Seligman re amicus brief (only stayed on for half)	0.5	\$775	\$388
Gupta, Deepak	4/12/2016	Call with Neil re supplemental brief	0.79	\$775	\$612
Gupta, Deepak	4/13/2016	Discuss potential constitutional issues with Neil; review Neil's draft outline for brief and David Seligman's draft amicus outline; email Sarah at SCHR and David S.	1.5	\$775	\$1,163
Gupta, Deepak	4/14/2016	Discuss supplemental brief with Neil and go over outline; emails with David Seligman and prospective amici for supplemental brief; additional research on separability doctrine for supplemental brief	2.8	\$775	\$2,170
Gupta, Deepak	4/14/2016	Call with Neil, David Seligman, and ACLU	0.55	\$775	\$426
Gupta, Deepak	4/18/2016	Work on supplemental briefing on arbitration and amicus strategy: edits to our brief, comments on amicus brief, call with David Seligman	3.2	\$775	\$2,480
Gupta, Deepak	4/19/2016	Work on supplemental briefing on arbitration--discuss next steps on brief with Neil, review Paul Arons's edits, correspond with Sarah at Southern Center re getting exhibit from Sentinel case	2.5	\$775	\$1,938
Gupta, Deepak	4/19/2016	Revising supplemental briefing on arbitration; discussions with Neil, Blythe and Stephanie re same	4.2	\$775	\$3,255
Gupta, Deepak	4/20/2016	Meeting with Jon and Neil re: final edits to brief	0.7	\$775	\$543
Gupta, Deepak	4/28/2016	Correspondence with David Seligman re replying to defendant's opposition to amicus brief	0.5	\$775	\$388
Gupta, Deepak	5/31/2016	Review case management statement; review Sherriff v. Gillie; attend Case Management Conference with Judge Chhabria telephonically	0.5	\$775	\$388
Gupta, Deepak	7/12/2016	Drafting and editing supplemental brief	7.2	\$775	\$5,580
Gupta, Deepak	7/13/2016	Drafting and editing supplemental brief	5.3	\$775	\$4,108
Gupta, Deepak	7/14/2016	Editing supplemental brief	7	\$775	\$5,425
Gupta, Deepak	7/15/2016	Finalizing supplemental brief	5.3	\$775	\$4,108
Gupta, Deepak	4/10/2017	Drafting and editing Ninth Circuit arbitration brief	8.5	\$775	\$6,588

Gupta, Deepak	4/11/2017	Drafting and editing Ninth Circuit arbitration brief	6.2	\$775	\$4,805
Gupta, Deepak	4/12/2017	Draft argument section of Ninth Circuit brief in arbitration appeal	3.7	\$775	\$2,868
Gupta, Deepak	4/13/2017	Draft argument section of Ninth Circuit brief in arbitration appeal	4.4	\$775	\$3,410
Gupta, Deepak	4/15/2017	Editing and drafting Ninth Circuit brief	1	\$775	\$775
Gupta, Deepak	4/16/2017	Editing and drafting Ninth Circuit brief	5.2	\$775	\$4,030
Gupta, Deepak	4/17/2017	Editing and drafting Ninth Circuit brief	3	\$775	\$2,325
Gupta, Deepak	4/18/2017	Editing and drafting Ninth Circuit brief	4.2	\$775	\$3,255
Gupta, Deepak	4/19/2017	Finalizing Ninth Circuit brief	7	\$775	\$5,425
Gupta, Deepak	4/19/2017	Proofing/sign off on Ninth Circuit brief	2	\$775	\$1,550
Gupta, Deepak	9/6/2017	Prep for moot court for Ninth Circuit arguments	4	\$775	\$3,100
Gupta, Deepak	9/7/2017	Moot ahead of oral argument for appeals	1.1	\$775	\$853
Gupta, Deepak	9/8/2017	Prep following moot court	5.5	\$775	\$4,263
Gupta, Deepak	9/9/2017	Oral arg prep	6.2	\$775	\$4,805
Gupta, Deepak	9/10/2017	Oral argument prep for two Ninth Circuit appeals	7.5	\$775	\$5,813
Gupta, Deepak	9/11/2017	Oral argument prep for two Ninth Circuit appeals	11	\$775	\$8,525
Gupta, Deepak	9/11/2017	Prep for and conduct section moot court for Ninth Circuit appeal	3.4	\$775	\$2,635
Gupta, Deepak	9/12/2017	Worked with co-counsel on argument preparation	6.2	\$775	\$4,805
Gupta, Deepak	9/12/2017	Oral argument prep for two Ninth Circuit appeals	7.5	\$775	\$5,813
Gupta, Deepak	9/13/2017	Prep for and present oral argument on consolidated appeals	6	\$775	\$4,650
Gupta, Deepak	6/3/2018	Draft and finalize declaration in support of class certification	3	\$775	\$2,325
Gupta, Deepak	7/12/2018	Meeting with Danny re response to MTD 2ac	0.34	\$775	\$264
Gupta, Deepak	10/26/2018	Moot on Rule 12(b)(6) motion	1.2	\$775	\$930
		<b>Statement Professional: Deepak Gupta</b>	<b>255.43</b>		<b>\$197,958</b>
<b>Statement Professional: Steffi Ostrowski</b>					
Ostrowski, Steffi	6/8/2020	Research & draft SJ briefs; correspondence re same	1.33	\$350	\$466
Ostrowski, Steffi	6/8/2020	Research & draft SJ briefs;	3.5	\$350	\$1,225
Ostrowski, Steffi	6/9/2020	Research & draft SJ briefs;	2.5	\$350	\$875
Ostrowski, Steffi	6/9/2020	Research & draft SJ briefs;	1.46	\$350	\$511
Ostrowski, Steffi	6/9/2020	Research & draft SJ briefs; correspondence re same	0.39	\$350	\$137
Ostrowski, Steffi	6/9/2020	Research & draft SJ briefs;	0.4	\$350	\$140
Ostrowski, Steffi	6/9/2020	Research & draft SJ briefs;	0.93	\$350	\$326
Ostrowski, Steffi	6/10/2020	Research & draft SJ briefs;	1	\$350	\$350
Ostrowski, Steffi	6/10/2020	Research & draft SJ briefs;	2.31	\$350	\$809
Ostrowski, Steffi	6/10/2020	Research & draft SJ briefs;	0.34	\$350	\$119
Ostrowski, Steffi	6/11/2020	Research & draft SJ briefs;	2.26	\$350	\$791
Ostrowski, Steffi	6/11/2020	Research & draft SJ briefs;	0.92	\$350	\$322
Ostrowski, Steffi	6/11/2020	Research & draft SJ briefs;	1.34	\$350	\$469
Ostrowski, Steffi	6/11/2020	Research & draft SJ briefs;	0.65	\$350	\$228
Ostrowski, Steffi	6/11/2020	Research & draft SJ briefs; correspondence re same	2	\$350	\$700
Ostrowski, Steffi	6/12/2020	Research & draft SJ briefs;	1	\$350	\$350
Ostrowski, Steffi	6/12/2020	Research & draft SJ briefs;	2.96	\$350	\$1,036
Ostrowski, Steffi	6/12/2020	Research & draft SJ briefs;	2	\$350	\$700
Ostrowski, Steffi	6/12/2020	Research & draft SJ briefs;	2.8	\$350	\$980
Ostrowski, Steffi	6/13/2020	Research & draft SJ briefs;	4.5	\$350	\$1,575
Ostrowski, Steffi	6/14/2020	Research & draft SJ briefs;	1.5	\$350	\$525
Ostrowski, Steffi	6/15/2020	Research & draft SJ briefs;	4	\$350	\$1,400
Ostrowski, Steffi	6/15/2020	Research & draft SJ briefs;	2.31	\$350	\$809
Ostrowski, Steffi	6/16/2020	Research & draft SJ briefs;	3.5	\$350	\$1,225
Ostrowski, Steffi	6/16/2020	Research & draft SJ briefs;	1	\$350	\$350
Ostrowski, Steffi	6/17/2020	Research & draft SJ briefs;	0.75	\$350	\$263
Ostrowski, Steffi	6/18/2020	Research & draft SJ briefs;	4	\$350	\$1,400
Ostrowski, Steffi	6/18/2020	Research & draft SJ briefs;	3.65	\$350	\$1,278
Ostrowski, Steffi	7/23/2020	Research & draft reply brief	5.75	\$350	\$2,013
Ostrowski, Steffi	7/24/2020	Research & draft reply brief	1.5	\$350	\$525
Ostrowski, Steffi	7/24/2020	Research & draft reply brief	5.5	\$350	\$1,925

Ostrowski, Steffi	7/26/2020	Research & draft reply brief	2	\$350	\$700
Ostrowski, Steffi	7/27/2020	Research & draft reply brief	5.75	\$350	\$2,013
Ostrowski, Steffi	7/28/2020	Research & draft reply brief	9	\$350	\$3,150
		<b>Statement Professional: Steffi Ostrowski</b>	<b>84.8</b>		<b>\$29,680</b>
<b>Statement Professional: Neil Sawhney</b>					
Sawhney, Neil	11/19/2015	CA case law re contract formation	1.6	\$600	\$960
Sawhney, Neil	11/20/2015	California case law research re contract formation, invalid claims	3.6	\$600	\$2,160
Sawhney, Neil	12/21/2015	Case-law research for opposition to motion to compel arbitration	2.6	\$600	\$1,560
Sawhney, Neil	12/21/2015	Outlining opposition to motion to compel arbitration; reviewed depositions	3.3	\$600	\$1,980
Sawhney, Neil	12/22/2015	Outlined opposition to motion to compel; reviewed depositions and other evidentiary material	4.1	\$600	\$2,460
Sawhney, Neil	12/22/2015	Call with co-counsel (Paul Arons) and Deepak re depositions	0.75	\$600	\$450
Sawhney, Neil	12/23/2015	California case-law research (duress, misrepresentation)	1.3	\$600	\$780
Sawhney, Neil	12/29/2015	Conducted legal research into arbitration's intersection with contract formation (i.e., Buckeye and its progeny)	3.1	\$600	\$1,860
Sawhney, Neil	12/29/2015	Outlined opposition to motion to compel arbitration	2.2	\$600	\$1,320
Sawhney, Neil	12/31/2015	Conducted California case-law research, particularly on duress and threats of prosecution/public policy	3.3	\$600	\$1,980
Sawhney, Neil	1/4/2016	California contract-law research; constitutional theories development	3.5	\$600	\$2,100
Sawhney, Neil	1/4/2016	Outline and begin drafting opposition to motion to compel	2.3	\$600	\$1,380
Sawhney, Neil	1/5/2016	Outline legal argument section for opposition	1.4	\$600	\$840
Sawhney, Neil	1/5/2016	Draft statement of the case for opposition	4.2	\$600	\$2,520
Sawhney, Neil	1/6/2016	Drafted statement of the case; began drafting legal argument section for opposition motion	8.3	\$600	\$4,980
Sawhney, Neil	1/7/2016	Drafted legal argument section; revised statement of the case (opposition to arbitration motion)	7.6	\$600	\$4,560
Sawhney, Neil	1/8/2016	Drafted legal argument section	5.8	\$600	\$3,480
Sawhney, Neil	1/9/2016	Drafted opposition to motion to compel arbitration	4.1	\$600	\$2,460
Sawhney, Neil	1/11/2016	Drafted opposition to motion to compel arbitration; prepared plaintiff declaration and exhibits; conducted constitutional-law research	10.14	\$600	\$6,084
Sawhney, Neil	1/12/2016	Prepared plaintiff and attorney declarations, exhibits, etc.	3.13	\$600	\$1,878
Sawhney, Neil	1/12/2016	Prepared final version of opposition; proofread and citechecked version before filing	6.45	\$600	\$3,870
Sawhney, Neil	1/13/2016	Case-law research for CA9 response brief	0.93	\$600	\$558
Sawhney, Neil	1/13/2016	CA9 brief legal research and initial outline	0.29	\$600	\$174
Sawhney, Neil	1/13/2016	Discussion with Deepak re CA9 brief strategy	0.9	\$600	\$540
Sawhney, Neil	1/15/2016	Outlined CA9 brief	0.55	\$600	\$330
Sawhney, Neil	1/19/2016	Outlined CA9 brief	2.42	\$600	\$1,452
Sawhney, Neil	1/19/2016	Call with Deepak and Blythe Chandler re CA9 brief	0.52	\$600	\$312
Sawhney, Neil	1/21/2016	Draft statement to CA9 brief	3.17	\$600	\$1,902
Sawhney, Neil	1/21/2016	Drafted statement for CA9 brief; research CA case law re anti-SLAPP public interest exception (§425.17(b))	4.24	\$600	\$2,544
Sawhney, Neil	1/22/2016	Drafted appellate jurisdiction section	4.1	\$600	\$2,460
Sawhney, Neil	1/22/2016	Revised statement	1.25	\$600	\$750
Sawhney, Neil	1/25/2016	Drafted argument section for CA9 brief	3.7	\$600	\$2,220
Sawhney, Neil	1/26/2016	Discussed CA9 brief with Deepak	0.23	\$600	\$138
Sawhney, Neil	1/26/2016	Drafted CA9 argument; revised statement	2.4	\$600	\$1,440
Sawhney, Neil	1/26/2016	Drafted argument section; revised statement	5.72	\$600	\$3,432
Sawhney, Neil	1/27/2016	Drafted CA9 argument	3.84	\$600	\$2,304
Sawhney, Neil	1/27/2016	Revised argument in CA9 brief	4.2	\$600	\$2,520
Sawhney, Neil	1/27/2016	Drafted introduction for CA9 brief	1.1	\$600	\$660
Sawhney, Neil	1/28/2016	Revised draft; prepared CA9 brief for filing	2.95	\$600	\$1,770
Sawhney, Neil	2/3/2016	Analyzed Breazeal's reply brief arguments	0.91	\$600	\$546
Sawhney, Neil	2/4/2016	Drafted surreply and administrative motion for leave to file	2.24	\$600	\$1,344
Sawhney, Neil	3/3/2016	Prepped Deepak for hearing on motion to compel arbitration	1.2	\$600	\$720



Sawhney, Neil	3/23/2016	Meeting with Deepak re supplemental brief	0.5	\$600	\$300
Sawhney, Neil	3/23/2016	Research re arbitration in criminal-law context	0.33	\$600	\$198
Sawhney, Neil	3/28/2016	Research re constitutional law argument; reached out to ACLU-NC re amicus brief	1.1	\$600	\$660
Sawhney, Neil	4/4/2016	Corresponded with ACLU-NC re amicus brief	0.5	\$600	\$300
Sawhney, Neil	4/6/2016	Call with Deepak and ACLU national re amicus brief	0.75	\$600	\$450
Sawhney, Neil	4/6/2016	Meeting with Deepak re constitutional arguments	0.6	\$600	\$360
Sawhney, Neil	4/7/2016	Call with David Seligman re amicus brief (Deepak on call for about half time)	1.05	\$600	\$630
Sawhney, Neil	4/8/2016	Case law research for supplemental brief	1.1	\$600	\$660
Sawhney, Neil	4/11/2016	Gave comments on amicus brief outline	0.44	\$600	\$264
Sawhney, Neil	4/11/2016	Outlined supplemental brief	0.64	\$600	\$384
Sawhney, Neil	4/12/2016	Discussed constitutional-law theories with Jon	0.2	\$600	\$120
Sawhney, Neil	4/12/2016	Outlined supplemental brief	1.66	\$600	\$996
Sawhney, Neil	4/12/2016	Outlined and drafted supplemental brief, conducted legal and factual research	2.1	\$600	\$1,260
Sawhney, Neil	4/12/2016	Call with Deepak re supplemental brief	0.79	\$600	\$474
Sawhney, Neil	4/13/2016	Con-law case-law research	0.24	\$600	\$144
Sawhney, Neil	4/13/2016	Discussed constitutional argument with Deepak	0.4	\$600	\$240
Sawhney, Neil	4/13/2016	Outlined and drafted supplemental brief	1.04	\$600	\$624
Sawhney, Neil	4/13/2016	Outlined and drafted supplemental brief	2.85	\$600	\$1,710
Sawhney, Neil	4/13/2016	Call with David Seligman, Deepak, and Jon re constitutional arguments for supplemental brief	1	\$600	\$600
Sawhney, Neil	4/14/2016	Meeting with Deepak re supplemental brief	0.6	\$600	\$360
Sawhney, Neil	4/14/2016	Drafted supplemental brief	5.71	\$600	\$3,426
Sawhney, Neil	4/14/2016	Call with Deepak, David Seligman, and ACLU	0.55	\$600	\$330
Sawhney, Neil	4/18/2016	Calls with David Seligman and Sarah Geraghty (and Deepak) re: amicus for supplemental brief	1	\$600	\$600
Sawhney, Neil	4/18/2016	Drafted and revised supplemental brief	4.55	\$600	\$2,730
Sawhney, Neil	4/18/2016	Discussion with Deepak re draft brief	1.3	\$600	\$780
Sawhney, Neil	4/18/2016	Revised supplemental brief	2.7	\$600	\$1,620
Sawhney, Neil	4/19/2016	Reviewed and provided general comments to amicus brief	0.66	\$600	\$396
Sawhney, Neil	4/20/2016	Revised supplemental brief and corresponded w co-counsel	0.6	\$600	\$360
Sawhney, Neil	4/20/2016	Proofed and prepared for filing	3.7	\$600	\$2,220
Sawhney, Neil	7/14/2016	Revised supplemental brief	1.7	\$600	\$1,020
Sawhney, Neil	7/14/2016	Revised supplemental brief	1.18	\$600	\$708
Sawhney, Neil	7/15/2016	Provided comments and revisions to supplemental brief	0.6	\$600	\$360
		<b>Statement Professional: Neil Sawhney</b>	<b>171.77</b>		<b>\$103,062</b>
<b>Statement Professional: Jonathan Taylor</b>					
Taylor, Jonathan	1/12/2016	Editing and providing comments on opposition to motion to compel arbitration; meeting w/ Deepak about same (.3 hours); meeting w/ Neil about same (.4 hours).	2.2	\$650	\$1,430
Taylor, Jonathan	4/13/2016	Preparing for call w/ David; call w/ David, Neil, & Deepak to discuss constitutional arguments (1 hour).	1.3	\$650	\$845
Taylor, Jonathan	4/20/2016	Reading, editing, and commenting on the supplement brief re arbitration. Composing emails to Deepak and Neil about same; meeting w/ Neil & Deepak to discuss final edits to brief (.7 hours).	3.1	\$650	\$2,015
		<b>Statement Professional: Jonathan Taylor</b>	<b>6.6</b>		<b>\$4,290</b>
<b>Statement Professional: Matt Wessler</b>					
Wessler, Matt	9/7/2017	prep for & participate in moot	3.25	\$775	\$2,519
Wessler, Matt	6/12/2020	Review & comment on SJ drafts; research re same	2.75	\$775	\$2,131
Wessler, Matt	6/15/2020	Revise SJ draft; correspondence & research re same; review record	4.5	\$775	\$3,488
Wessler, Matt	7/27/2020	Review & edit replySJ; correspondence re same	1.5	\$775	\$1,163
		<b>Statement Professional: Matthew Wessler</b>	<b>12</b>		<b>\$9,300</b>

<b>Statement Professional: Daniel Wilf-Townsend</b>					
Wilf-Townsend, Danie	7/9/2018	Reading filings	2.1	\$600	\$1,260
Wilf-Townsend, Danie	7/10/2018	Drafting responses to MTD 2AC	4.04	\$600	\$2,424
Wilf-Townsend, Danie	7/11/2018	drafting and researching response to MTDs on SAC	2.36	\$600	\$1,416
Wilf-Townsend, Danie	7/11/2018	Research and drafting response to MTD 2AC	2.22	\$600	\$1,332
Wilf-Townsend, Danie	7/12/2018	Research and drafting response to MTD 2AC	6.61	\$600	\$3,966
Wilf-Townsend, Danie	7/12/2018	Meeting with DG re response to MTD 2AC	0.34	\$600	\$204
Wilf-Townsend, Danie	7/12/2018	Phone call with Paul Arons re response to MTD 2AC	0.24	\$600	\$144
Wilf-Townsend, Danie	7/13/2018	Drafting response to MTD 2AC	2.16	\$600	\$1,296
Wilf-Townsend, Danie	7/16/2018	Response drafting	1.05	\$600	\$630
Wilf-Townsend, Danie	7/16/2018	Drafting response	0.81	\$600	\$486
Wilf-Townsend, Danie	7/17/2018	Reviewing opposition and reply	0.46	\$600	\$276
Wilf-Townsend, Danie	8/2/2018	oral argument prep	5.81	\$600	\$3,486
Wilf-Townsend, Danie	10/22/2018	oral argument prep	6.05	\$600	\$3,630
Wilf-Townsend, Danie	10/23/2018	oral argument prep	9	\$600	\$5,400
Wilf-Townsend, Danie	10/24/2018	oral argument prep	7	\$600	\$4,200
Wilf-Townsend, Danie	10/25/2018	Worked with co-counsel on prep for upcoming hearing; independent prep	9	\$600	\$5,400
Wilf-Townsend, Danie	10/26/2018	Participated in moot, continued argument prep	8	\$600	\$4,800
Wilf-Townsend, Danie	10/29/2018	Participated in moot, call with co-counsel regarding oral argument, further prep	4	\$600	\$2,400
Wilf-Townsend, Danie	11/1/2018	Prepared for hearing on motion for class certification and motions to dismiss, participated in hearing	5.5	\$600	\$3,300
Wilf-Townsend, Danie	1/6/2019	Editing 23f answer	5	\$600	\$3,000
		<b>Statement Professional: Daniel Wilf-Townsend</b>	<b>81.75</b>		<b>\$49,050</b>
		<b>Grand Total</b>	<b>650.69</b>		<b>\$401,796</b>

# Exhibit B



