

THE HONORABLE DAVID G. ESTUDILLO

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AARON WILLIAMS, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

PILLPACK LLC,

Defendant.

Case No. 3:19-cv-05282-DGE

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

I, Jennifer Rust Murray, declare as follows:

A. Background and experience.

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

2. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex civil and commercial litigation with an emphasis on consumer protection, product defect, civil rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel representing multi-state and nationwide classes in state and federal court in Washington and

1 throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have
2 represented scores of classes, tried class actions in state and federal court, and obtained
3 hundreds of millions of dollars in monetary relief to workers, consumers, and other individuals.

4 3. I am a founding member of Terrell Marshall. I practice complex litigation,
5 including the prosecution of consumer and wage and hour class actions. I received my J.D. in
6 2005 from the University of Washington School of Law where I was a member of the
7 Washington Law Review. My law review article entitled “Proving Cause in Fact under
8 Washington’s Consumer Protection Act: The Case for a Rebuttable Presumption of Reliance”
9 won the Carkeek prize for best submission by a student author. Before law school, I earned a
10 Ph.D. in Philosophy from Emory University. I have been an active member of the Washington
11 State Bar Association since my admission to the bar in 2005. I was admitted to the Oregon State
12 Bar in 2010. I am currently vice-president of the board of Washington’s Unemployment Law
13 Project. I regularly present at legal conferences on consumer issues.

14 **B. Qualifications of other Terrell Marshall attorneys and staff.**

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

4 5. Adrienne D. McEntee became a member of Terrell Marshall in 2014. The core of
5 Ms. McEntee's practice is complex litigation, including the prosecution of class actions on
6 behalf of consumers, actions involving vulnerable adults, trusts and estates, and real estate and
7 commercial disputes. Ms. McEntee has significant trial experience, having successfully tried
8 commercial cases involving claims of breach of fiduciary duty, breach of contract, and breach of
9 easement. Ms. McEntee graduated from the University of Washington School of Law in 2003,
10 where she was a member of the Pacific Rim Law and Policy Journal and Moot Court Honor
11 Board. Before joining Terrell Marshall, Ms. McEntee was a member of Tousley Brain Stephens
12 PLLC, where she practiced for five years. Before entering private practice, Ms. McEntee worked
13 with the King County Prosecuting Attorney's Office, where she prosecuted a broad range of
14 crimes. Ms. McEntee has tried approximately fifty cases and has briefed, argued, and won cases
15 before the Washington State Court of Appeals. Since her admission to the bar, Ms. McEntee has
16 been an active member of the Washington State Bar Association and Washington Women
17 Lawyers, as a member of the Judicial Evaluation Committee. Ms. McEntee has been named on
18 the Washington Super Lawyers list since 2018.

19 6. Amanda M. Steiner became a member of Terrell Marshall in 2015. She practices
20 complex litigation, including the prosecution of consumer, defective product, wage and hour,
21 and civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in
22 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that
23 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex
24 securities, antitrust, consumer and civil rights class action in federal and state courts
25 throughout the United States. Ms. Steiner was selected for inclusion in the annual Northern
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1 California “Super Lawyers” list and was named to the Top 50 Women Lawyers of Northern
2 California. She is a Fellow of the American Bar Foundation.

3 7. Blythe H. Chandler joined Terrell Marshall in 2014 and became a member in
4 2018. She practices complex litigation with a focus on prosecution of consumer class actions.
5 She has been appointed class counsel in cases challenging a wide range of unfair or deceptive
6 practices, including debt collection practices. In 2010, Ms. Chandler received her J.D. from the
7 University of Washington School of Law with high honors, Order of the Coif. She served as Chief
8 Articles Editor for the Washington Law Review. Before joining Terrell Marshall, Ms. Chandler
9 served as a law clerk to the Honorable Betty B. Fletcher, Senior United States Circuit Judge for
10 the Ninth Circuit Court of Appeals, and to the Honorable John C. Coughenour, Senior United
11 States District Judge for the Western District of Washington. She also served as a judicial extern
12 to the Honorable Robert S. Lasnik, United States District Judge for the Western District of
13 Washington. Ms. Chandler co-authored chapters of the Consumer Protection Deskbook
14 published by the Washington State Association for Justice (WSAJ) and has spoken on topics
15 including use of experts and personal jurisdiction in class actions. She is a member of the
16 Washington Employment Lawyers Association (WELA) Amicus Committee and currently co-
17 chair WSAJ’s Consumer Protection Section. She was named to the 2020 Rising Star List by
18 Washington Super Lawyers.

19 8. Toby J. Marshall is a founding member of Terrell Marshall who represents clients
20 in a wide variety of class actions and other complex litigation, including wage and hour, product
21 defect, civil rights, and consumer protection cases. Mr. Marshall has served as co-lead counsel
22 in numerous class and collective actions and has tried and won individual and class cases in
23 state and federal court. He has also argued several times before the Washington Supreme
24 Court, the Washington Court of Appeals, and the Ninth Circuit Court of Appeals. In 2002, Mr.
25 Marshall received his J.D. from the University of Washington School of Law, where he served on
26 the Moot Court Honor Board and was selected to the Order of Barristers. Before forming Terrell
27

1 Marshall, Mr. Marshall was a member of Tousley Brain Stephens PLLC. He regularly speaks at
2 seminars on employment and class action issues. Mr. Marshall is a member of the Washington
3 Employment Lawyers Association and serves on WELA’s amicus and legislative committees. He
4 also serves on the ACLU of Washington’s legal committee. Mr. Marshall has been named
5 several times to the Washington Super Lawyers list..

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

8 10. Jodi Nuss is a senior paralegal at Terrell Marshall with more than 13 years of
9 experience in the legal field.

10 **C. Other cases litigated by Terrell Marshall.**

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

- 13 a. *Berman v. Freedom Financial Network, LLC*—Filed in 2018 on
14 behalf of consumers who received texts and robocalls on their
15 cell phones without their prior express written consent. The
16 Northern District of California granted final approval of the \$9.5
17 million settlement on February 23, 2024.
- 18 b. *Abante Rooter & Plumbing, Inc. v. Alarm.com Inc.*—Filed in 2015
19 on behalf of consumers who received solicitation calls on their
20 cellular and residential telephones without their prior express
21 consent. The Northern District of California granted final
22 approval of the \$28 million settlement on August 15, 2019.
- 23 c. *Borecki v. Raymours Furniture Co., Inc.*—Filed in 2017 on behalf
24 of consumers who received spam text messages on their
25 cellular telephones without their prior express consent. The
26 Southern District of New York granted final approval of the
27 \$4.25 million settlement on September 10, 2019.
- d. *Snyder v. Ocwen Loan Servicing, LLC*—Filed in 2014 on behalf of
consumers who received automated collection calls on their
cellular telephones without their prior express consent. The

1 Northern District of Illinois granted final approval of the \$21.5
2 million settlement on May 14, 2019.

3 e. *Melito v. American Eagle Outfitters, Inc.*—Filed in 2014 on
4 behalf of consumers who received spam text messages on their
5 cellular telephones without their prior express consent. The
6 Southern District of New York granted final approval to the
7 \$14.5 million settlement on September 11, 2017, which the
8 Second Circuit affirmed on April 30, 2019.

9 f. *In re Capital One Telephone Consumer Protection Act*
10 *Litigation*—Filed in 2012 on behalf of consumers who received
11 automated, prerecorded collection calls on their cellular
12 telephones without their prior express consent. Terrell Marshall
13 served as co-lead counsel in the multidistrict litigation. The
14 Northern District of Illinois granted final approval of the \$75
15 million settlement on February 23, 2015.

16 g. *In re Monitronics International, Inc. Telephone Consumer*
17 *Protection Act Litigation*—Filed in 2011 on behalf consumers
18 who received automated, prerecorded solicitation calls on their
19 residential and telephones without their prior express consent.
20 Terrell Marshall served as co-lead counsel in the multidistrict
21 litigation. The Northern District of West Virginia granted final
22 approval of the \$28 million settlement on June 12, 2018.

23 h. *Abante Rooter & Plumbing, Inc. v. Pivotal Payments Inc.*— Filed
24 in 2016 on behalf of consumers that received automated
25 solicitation telephone calls to their cell phones without their
26 prior express consent. The Northern District of California
27 granted final approval of the \$9 million settlement on October
15, 2018.

i. *Wilkins v. HSBC Bank Nevada, N.A.*—Filed in 2014 on behalf of
individuals who received prerecorded calls using an automatic
dialing system without their prior consent. The Northern
District of Illinois granted final approval of the \$39.9 million
settlement on March 17, 2015.

j. *Charvat v. Plymouth Rock Energy*—Filed in 2015 on behalf of
consumers who received automated solicitation telephone calls
on their cellular and residential telephones without their prior

1 express consent within the meaning of the Telephone
2 Consumer Protection Act, 47 U.S.C. § 227 et seq. and/or to
3 telephone numbers registered on the National-Do-Not-Call
4 Registry. The case settled on a class wide basis and a final
5 judgment was entered in 2018.

6 k. *Booth v. Appstack, Inc.*—Filed in 2013 on behalf of small
7 businesses that received prerecorded calls using an automatic
8 dialing system on cellular telephone lines without their prior
9 consent. The court certified the class, denied a motion to
10 decertify, denied the defendants’ motion for summary
11 judgment and granted partial summary judgment for the class.
12 The case settled on the eve of trial and the court granted final
13 approval of the \$975,000 settlement in 2017.

14 l. *Davenport v. Discover Financial Services*—Filed on behalf of
15 consumers who received automated solicitation telephone calls
16 on their cellular telephones without their prior express consent
17 within the meaning of the Telephone Consumer Protection Act,
18 47 U.S.C. § 227 et seq. The case settled on a class-wide basis for
19 \$5,000,000 in 2016, and final approval was granted in
20 December 2017.

21 m. *Bee, Denning, Inc. v. Capital Alliance Group*—Terrell Marshall
22 represents two certified classes of consumers who received
23 junk faxes and automated, prerecorded solicitation telephone
24 calls on their cellular telephones without their prior express
25 consent within the meaning of the Telephone Consumer
26 Protection Act, 47 U.S.C. § 227 et seq. The case settled on a
27 class-wide basis in 2016, and final approval was granted in
November 2016.

n. *Lushe v. Verengo, Inc.*—Filed on behalf of consumers who
received automated, prerecorded solicitation telephone calls on
their cellular and residential telephones without their prior
express consent, within the meaning of the Telephone
Consumer Protection Act, 47 U.S.C. § 227 et seq. The case
settled on a class-wide basis in 2015 for \$2,365,000, and final
approval was granted in May 2016.

o. *Rinky Dink v. World Business Lenders, LLC*—Filed on behalf of
consumers who received automated, prerecorded solicitation

1 telephone calls on their cellular telephones and Washington
2 landlines without their prior express consent within the
3 meaning of the Telephone Consumer Protection Act, 47 U.S.C.
4 § 227 et seq., the Washington Automatic Dialing and
5 Announcing Device statute, RCW 80.36.400, and the
6 Washington Consumer Protection Act, RCW 19.86 et seq. The
7 case settled on a class-wide basis in 2015 for \$1,000,000, and
8 final approval was granted in May 2016.

9 p. *Rinky Dink v. Electronic Merchant Systems, Inc.*—Filed on behalf
10 of consumers who received automated, prerecorded
11 solicitation telephone calls on their cellular telephones and
12 Washington landlines without their prior express consent within
13 the meaning of the Telephone Consumer Protection Act, 47
14 U.S.C. § 227 et seq., the Washington Automatic Dialing and
15 Announcing Device statute, RCW 80.36.400, and the
16 Washington Consumer Protection Act, RCW 19.86 et seq. The
17 case settled on a class-wide basis in 2015 for \$1,250,000, and
18 final approval was granted in April 2016.

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

21 **D. The prosecution of this case**

22 13. Terrell Marshall has advanced significant costs for and invested numerous hours
23 into the investigation and prosecution of this case. We will continue to commit the time and
24 resources necessary to litigate the case and fairly and adequately represent and protect the
25 interests of the Class.

26 14. Both parties took extensive discovery. We took steps to quickly secure calling
27 records, which is particularly critical when calls are placed by third parties. We also served early
targeted discovery on PillPack to identify and focus on the key disputed issues. Williams served
four sets of discovery requests and responded to three. Numerous disputes required the
parties to meet and confer about the scope of requests and sufficiency of responses.

15 15. Williams served subpoenas on third parties Prospects DM and Performance
16 Media early in the case, seeking calling records and documents and information relating to the

1 PillPack calling campaigns. PillPack objected, requiring the parties to confer about the timing of
2 the subpoenas and scope of the requests. Because PillPack sourced the telephone numbers
3 from several additional third-party lead generators, the parties served subpoenas on numerous
4 additional third parties in the course of the litigation.

5 16. The parties and third parties produced more than 20,000 pages of documents.
6 They took fifteen depositions, including Williams’s deposition, five depositions of PillPack
7 representatives, seven depositions of third parties, and two expert depositions.

8 17. The parties retained multiple experts. Williams’s two experts produced a total of
9 six reports and PillPack’s three experts produced five reports. The experts’ work reveals that
10 the vast majority of class members—nearly 90%—received only one violation call.

11 18. On June 5, 2024, the parties participated in a full-day mediation with
12 experienced mediator Robert Meyer of JAMS. The mediation concluded without resolution but
13 the mediator’s work with the parties after mediation resulted in the settlement in principle. The
14 parties then finalized the terms of the agreement through arms’ length negotiations.

15 **E. Terrell Marshall’s lodestar**

16 19. Since the beginning of this case, Terrell Marshall has worked with no guarantee
17 of being compensated for its time and efforts. Payment of Terrell Marshall’s fees has always
18 been contingent on successfully obtaining relief for the plaintiff and class members. As a result,
19 there was a substantial risk of non-payment, particularly in light of the challenges inherent in
20 this type of case. Work on this case has necessarily been to the exclusion of work on other
21 matters that likely would have generated fees. Terrell Marshall has also been denied use of the
22 fees it earned over the course of this case.

23 20. A spreadsheet that compiles the contemporaneously maintained billing records
24 of Terrell Marshall attorneys and staff is attached as **Exhibit 1**. I have reviewed these billing
25 records and reduced and eliminated time where appropriate. I eliminated time that was
26 administrative in nature, or that appeared to be redundant or inefficient. We have not included
27

1 the time spent on preparing the motion for attorneys' fees and costs, which exceeds 35 hours.
 2 We also have not included the time devoted to class notice and administration during the
 3 month of November. In addition to eliminating time entirely from this exhibit, the timekeepers
 4 whose time entries are in red are not included in the firm's lodestar.

5 21. It is my firm belief that the time billed was reasonably necessary to litigate this
 6 case and secure a settlement on behalf of the plaintiff and the class.

7 22. The following table identifies the attorneys and staff members from Terrell
 8 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the
 9 timekeepers below I have stated the current hourly rate, the number of hours worked through
 10 October 31, 2024, and the total amount of fees. These time summaries are taken from
 11 contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the
 12 regular course of business.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
ATTORNEYS				
Beth E. Terrell Founding Member J.D. from Univ. of California, Davis School of Law, 1995	Worked on investigation and complaint, discovery and expert strategy and issues, took depositions, worked on class certification and notice strategy, mediation and settlement negotiations.	\$775	285.8	\$221,495.00
Jennifer Rust Murray Founding Member J.D. from Univ. of Washington School of Law, 2005	Responsible for case management and overall case strategy, worked on investigation and complaint, managed discovery and experts, participated in depositions of PillPack representatives and third parties, worked on class certification and notice	\$725	1,298.4	\$941,340.00

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 DECLARATION OF JENNIFER RUST MURRAY IN SUPPORT OF PLAINTIFF'S
 MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARD - 10
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NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
	strategy and motions, drafted responses to summary judgment motions, managed subpoenas to wireless carriers, related motions to enforce, and motion to compel PillPack to produce class member data, worked on settlement strategy and documentation.			
Blythe D. Chandler Member J.D. from Univ. of Washington School of Law, 2010	Took depositions of PillPack representatives and third parties, worked on discovery issues and with experts, developed strategy and drafted class certification and notice motions, drafted responses to summary judgment motions, worked on subpoenas to wireless carriers, related motions to enforce, and motion to compel PillPack to produce class member data, worked with class notice administrator, drafted mediation brief, settlement agreement, notice documents, and motion for preliminary approval of settlement.	\$600	940.4	\$564,240.00
Toby J. Marshall Founding Member J.D. from Univ. of Washington School of Law, 2002	Worked on investigation, case strategy, and initial complaint.	\$750	2.8	\$2,100.00
Amanda M. Steiner Member J.D. from UC Berkeley School of Law, 1997	Worked on class certification strategy and briefing and notice issues.	\$750	85.9	\$64,425.00

DECLARATION OF JENNIFER RUST MURRAY IN SUPPORT OF PLAINTIFF'S
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TERRELL MARSHALL LAW GROUP PLLC
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Seattle, Washington 98103-8869
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www.terrellmarshall.com

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Adrienne D. McEntee Member J.D. from Univ. of Washington School of Law, 2003	Worked with experts and on discovery disputes and class certification.	\$700	45.3	\$31,710.00
PARALEGALS AND LEGAL ASSISTANTS				
Jennifer Boschen Senior Paralegal 23 years legal experience	Worked on document and data review and analysis and deposition preparation.	\$295.00	72.2	\$21,299.00
Jodi Nuss Senior Paralegal 10 years legal experience	Managed, processed, and analyzed data productions and documents from PillPack and numerous third parties, worked on subpoenas to wireless carriers and other third parties and handled productions, worked with experts, assisted with discovery, motions, and deposition and trial preparation.	\$295.00	980.7	\$289,306.50
Heather Brown Paralegal 21 years legal experience	Processed document productions and prepared motions and exhibits for filing.	\$225	37.3	\$8,392.50
Bradford Kinsey Legal Assistant 28 years legal experience	Prepared pleadings, subpoenas, discovery requests and responses, and motions.	\$225	70.0	\$15,750.00
Holly Rota Legal Assistant 19 years legal experience	Prepared pleadings, motions, and subpoenas.	\$225	25.5	\$5,737.50
Krystal Brown Legal Assistant	Prepared subpoenas, motions and settlement documents.	\$225	24.9	\$5,602.50

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NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
13 years legal experience				
Laura Murray Legal Assistant 2 years legal experience	Assisted with subpoenas to wireless carriers.	\$125	28.6	\$3,575.00
TOTAL			3,897.8	\$2,174,973.00

23. I anticipate the firm will incur additional fees in relation to the approval and settlement administration process, including for time spent briefing the final approval motion, responding to class member inquiries and any objections, attending the final approval hearing, and supervising the claims process and distribution of the Settlement Fund.

24. The work performed by paralegals and legal assistants was work that I or an attorney would have had to perform absent their assistance. Paralegal Jodi Nuss's work required an understanding of the facts and claims at issue in the case and included extensive data analysis that was instrumental to establishing PillPack's liability, identifying class members, and determining potential damages. The work of the other paralegals and legal assistants required an understanding of relevant legal rules and concepts. All of these staff members are qualified to perform substantive legal work based on their training and past experience working for attorneys.

25. Terrell Marshall sets rates for attorneys and staff members based on a variety of factors, including among others, the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets where legal services are typically performed; and the experience, reputation and ability of the attorneys and staff members. Attached to this declaration as **Exhibit 2** is a true and correct copy of a declaration from defense counsel showing that they billed clients at rates of \$855 for senior partners, \$635 for partners, and \$535 for senior associates.

DECLARATION OF JENNIFER RUST MURRAY IN SUPPORT OF PLAINTIFF'S
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1 26. Courts around the country have approved fee requests based on Terrell
2 Marshall's standard rates at the time of the application. Here is a sample of the courts that
3 have approved Terrell Marshall's rates as reasonable in class action litigation:

- 4 a. September 2024 in *M.S. v. Med-Data, Inc.*, No. 4:22-cv-00187 (S.D. Tex.);
- 5 b. July 2024 in *Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR
6 (W.D. Wash.);
- 7 c. February 2024 in *Berman v. Freedom Financial Netowrk, LLC*, No. 4:18-cv-
8 01060-YGR (N.D. Cal.);
- 9 d. August 2021 in *Carrillo v. Wells Fargo Bank, N.A.*, No. 2:18-cv-03095-SJF-
10 SIL (E.D.N.Y.);
- 11 e. October 2020 in *Horton v. Cavalry Portfolio Services*, No. 13-cv-00211-
12 JAH-WVG (S.D. Cal.);
- 13 f. September 2020 in *Gambles v. Sterling Infosystems, Inc.*, No. 1:15-cv-
14 09746-PAE (S.D.N.Y.);
- 15 g. September 2019, in *Borecki v. Raymours Furniture*, No. 1:17-cv-01188-
16 LAK-SN (S.D.N.Y.);
- 17 h. August 2019, in *Abante Rooter and Plumbing v. Alarm.com*, No. 4:15-cv-
18 06314-YGR (N.D. Cal.);
- 19 i. September 2017, in *Melito v. American Eagle Outfitters, Inc.*, No. 14-CV-
20 2440 (VEC) (S.D.N.Y.);
- 21 j. May 2016, in *Lushe v. Verengo, Inc.*, No. CV 13-07632-AB (PJWx) (C.D.
22 Cal.);
- 23 k. September 2014, in *Chesbro v. Best Buy Stores, L.P.*, No. C10-774 RAJ
24 (W.D. Wash.);
- 25 l. March 2013, in *Meilleur v. AT&T Corp.*, No. C11-01025 MJP (W.D. Wash.);
- 26 m. October 2012, in *Khadera v. ABM Industries, Inc.*, No. C08-0417 RSM
27 (W.D. Wash.);
- n. September 2012, in *Arthur v. Sallie Mae, Inc.*, No. C10-00198 JLR (W.D.
Wash.);

o. January 2012, in *Milligan v. Toyota Motor Sales, U.S.A., Inc.*, No. C09-05418 RS (N.D. Cal.); and

p. August 2011, in *Seraphin v. AT&T Internet Services*, CV-00131-REB (D. Idaho)

F. Class Counsel’s lodestar

27. Collectively, Class Counsel billed over 5,145 hours for a total lodestar of \$2,991,553. Class Counsel worked collaboratively, but also took care to avoid duplication of effort by dividing tasks according to each professional’s skill, experience, and availability, both within and amongst the firms. Class Counsel kept contemporaneous, detailed time records in chronological order by timekeeper in the regular course of business. The resulting hours are those that would be billed to a fee-paying client in a non-contingent case. Class Counsel’s current hours, by firm, are summarized in this chart.

Firm	Hours	Lodestar
Terrell Marshall Law Group	3,897.8	\$2,174,973.00
Smith & Dietrich Law Offices PLLC	521.9	\$272,380.00
Paronich Law, P.C. ¹	725.6	\$544,200.00
TOTAL	5,144.5	\$2,991,553

G. Terrell Marshall’s litigation costs

28. Terrell Marshall incurred out-of-pocket litigation expenses and obligations totaling \$268,976.38, primarily to cover expenses related to class notice, experts, deposition costs, filing fees, mediation fees, and legal research:

¹ Although he included the time in the time records attached to his declaration, Mr. Paronich’s totals here do not include the 39 estimated hours (\$29,250) he expects to work in the future to see this case through to final approval.

Category of Expense	Total
Cell Phone Carrier Records	\$14,639.82
Class Notice	\$142,110.12
Court Reporter Fees	\$18,724.95
Expert Costs	\$35,859.39
FedEx	\$22.82
Filing Fees	\$680.00
Forensic Analysis Costs	\$2,938.45
Investigator Fees	\$4,683.68
Mediation Fees	\$12,500.00
Process Server Fees	\$10,216.78
Transcripts	\$28,105.38
Travel (Air Fare, Hotel, Meals)	\$1,919.99
Westlaw Charges	\$513.05
TOTAL	\$272,914.43

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

EXECUTED at Seattle, Washington and DATED this 21st day of November, 2024.

By: /s/ Jennifer Rust Murray
Jennifer Rust Murray, WSBA #36983

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EXHIBIT 1

Date	Timekeeper	Narrative	Units	Rate	Value
5/22/2019	ADM	Reviewed PillPack' s answer.	0.2	\$ 700.00	\$ 140.00
5/29/2019	ADM	Reviewed letter from defendant regarding agents; call with co-counsel.	0.5	\$ 700.00	\$ 350.00
7/12/2019	ADM	Reviewed PillPack' s initial disclosures.	0.2	\$ 700.00	\$ 140.00
2/25/2020	ADM	Call regarding discovery dispute over call records.	0.2	\$ 700.00	\$ 140.00
6/15/2020	ADM	Reviewed expert reports; worked on revisions to Mr. Hansen's rebuttal report.	3.5	\$ 700.00	\$ 2,450.00
6/16/2020	ADM	Worked on expert reports.	6.5	\$ 700.00	\$ 4,550.00
6/17/2020	ADM	Worked on Mr. Hansen's rebuttal report.	9.3	\$ 700.00	\$ 6,510.00
6/18/2020	ADM	Worked on Hansen rebuttal report.	4.5	\$ 700.00	\$ 3,150.00
6/19/2020	ADM	Worked on Hansen rebuttal report.	6.6	\$ 700.00	\$ 4,620.00
7/24/2020	ADM	Call with Ms. Murray regarding Hansen's rebuttal report.	0.2	\$ 700.00	\$ 140.00
8/13/2020	ADM	Reviewed order on motion to stay.	0.1	\$ 700.00	\$ 70.00
2/12/2021	ADM	Reviewed class cert decision.	0.2	\$ 700.00	\$ 140.00
4/16/2021	ADM	Zoom conference with counsel for PillPack.	0.5	\$ 700.00	\$ 350.00
4/23/2021	ADM	Reviewed status report; internal call regarding the same.	0.3	\$ 700.00	\$ 210.00
4/26/2021	ADM	Email from expert Jeff Hansen.	0.2	\$ 700.00	\$ 140.00
1/3/2022	ADM	Researched protective order issues.	0.5	\$ 700.00	\$ 350.00
1/14/2022	ADM	Reviewed Mr. Hansen's draft expert report; zoom call with the same.	2.2	\$ 700.00	\$ 1,540.00
3/10/2022	ADM	Reviewed inbox and sent files for correspondence with Mr. Hansen.	0.5	\$ 700.00	\$ 350.00
5/27/2022	ADM	Reviewed PillPack's opposition to motion for class cert.	0.4	\$ 700.00	\$ 280.00
5/30/2022	ADM	Reviewed PillPack response to motion for class certification.	0.5	\$ 700.00	\$ 350.00
5/31/2022	ADM	Internal call regarding PillPack reply; worked on typicality and adequacy sections.	4.1	\$ 700.00	\$ 2,870.00
6/1/2022	ADM	Worked on adequacy and typicality arguments; call regarding the same.	2.1	\$ 700.00	\$ 1,470.00
6/2/2022	ADM	Worked on trimming reply brief.	1.8	\$ 700.00	\$ 1,260.00
6/23/2022	ADM	Reviewed defendant's motion for summary judgment.	0.2	\$ 700.00	\$ 140.00
		Statement Professional: Adrienne McEntee	45.3		\$ 31,710.00
7/24/2020	AMS	Revised class certification motion [1.6].	1.6	\$ 750.00	\$ 1,200.00
9/20/2020	AMS	Revised response to summary judgment motion [3.5].	3.5	\$ 750.00	\$ 2,625.00
8/5/2021	AMS	Revised notice motion, related research and strategy conference [1.8].	1.8	\$ 750.00	\$ 1,350.00
9/27/2021	AMS	Worked on deposition issues, related research and strategy conferences, started motion for leave [2.8].	2.8	\$ 750.00	\$ 2,100.00
10/4/2021	AMS	Reviewed motion to modify in preparation for drafting reply [1.0].	1	\$ 750.00	\$ 750.00
10/5/2021	AMS	Reviewed opposition to motion to modify, strategy conference, and worked on reply [6.7].	6.7	\$ 750.00	\$ 5,025.00
10/6/2021	AMS	Worked on reply in support of motion to modify, strategy conferences, research [9.0].	9	\$ 750.00	\$ 6,750.00
10/7/2021	AMS	Worked on reply, research, strategy conferences [8.5].	8.5	\$ 750.00	\$ 6,375.00
10/8/2021	AMS	Worked on reply in support of motion to modify, research, strategy conferences [8.2].	8.2	\$ 750.00	\$ 6,150.00
10/27/2021	AMS	Worked on second amended motion to approve notice plan and supporting documents, email with Epiq, worked on supplemental reply in support of motion to amend class definition, drafted motion for leave to file overlength brief [8.8].	8.8	\$ 750.00	\$ 6,600.00
10/28/2021	AMS	Worked on supplemental reply in support of motion to amend class definition and supporting documents, worked on second amended motion to approve notice plan, strategy conferences, emails and calls with team and Epiq [9.5].	9.5	\$ 750.00	\$ 7,125.00
10/29/2021	AMS	Worked on supplemental reply in support of motion to amend class definition and related documents, worked on second amended motion to approve notice plan and related documents, strategy conferences and emails with team and Epiq [10.2].	10.2	\$ 750.00	\$ 7,650.00
11/1/2021	AMS	Worked on filing follow up and related strategy conferences [0.6]; emailed draft notices to Epiq [0.2].	0.8	\$ 750.00	\$ 600.00
4/19/2022	AMS	Revised class certification motion, related strategy conference [2.4].	2.4	\$ 750.00	\$ 1,800.00
2/14/2023	AMS	Reviewed notice plan and opposition and worked on reply, related research [3.1].	3.1	\$ 750.00	\$ 2,325.00

Date	Timekeeper	Narrative	Units	Rate	Value
2/15/2023	AMS	Worked on reply in support of notice plan, related research and strategy conference [3.3]; made further revisions to reply, including additional research [2.2].	5.5	\$ 750.00	\$ 4,125.00
2/17/2023	AMS	Revised response to motion to dismiss [0.8].	0.8	\$ 750.00	\$ 600.00
9/8/2023	AMS	Finalized reply and supporting documents [0.6].	0.6	\$ 750.00	\$ 450.00
9/12/2023	AMS	Reviewed response to cross-motion [0.3].	0.3	\$ 750.00	\$ 225.00
10/19/2023	AMS	Reviewed motion for reconsideration [0.8].	0.8	\$ 750.00	\$ 600.00
		Statement Professional: Amanda Steiner	85.9	\$	\$ 64,425.00
4/4/2019	BET	Telephone conference with co-counsel regarding factual background and case strategy issues [.2].	0.2	\$ 775.00	\$ 155.00
4/9/2019	BET	Analyzed background facts regarding Plaintiff's claims [.8]; analyzed similar litigation for arbitration clause issues [.6]; worked on draft complaint[1.2]; communications with co-counsel regarding same [.6].	3.2	\$ 775.00	\$ 2,480.00
4/10/2019	BET	Continued analyzing factual background, including call recordings [1.2]; continued working on complaint [1.4]; communications with co-counsel regarding revised complaint [.4]; finalized complaint [.3].	3.3	\$ 775.00	\$ 2,557.50
4/12/2019	BET	Finalized complaint for filing and assisted BKK with same [.6].	0.6	\$ 775.00	\$ 465.00
4/17/2019	BET	Emails with co-counsel regarding service of process [.1].	0.1	\$ 775.00	\$ 77.50
5/7/2019	BET	Telephone conference with Mr. Payson regarding appearance in case and class definition [.3]; emails with co-counsel regarding same [.2]; worked on amended complaint [.2].	0.7	\$ 775.00	\$ 542.50
5/8/2019	BET	Finalized amended complaint [.2].	0.2	\$ 775.00	\$ 155.00
5/22/2019	BET	Reviewed answer [.4]; emails regarding affirmative defenses and status of document production by Mr. Payson [.4]; emails to and from Mr. Payson regarding same [.1]; worked on scheduling 26(f) [.2].	1.2	\$ 775.00	\$ 930.00
5/28/2019	BET	Analyzed FRE 408 letter, factual background, and recent legal developments [.7]	0.7	\$ 775.00	\$ 542.50
5/29/2019	BET	Reviewed settlement letter [.2]; negotiated settlement discussion agreement [.6]; prepared for and attended telephone conference with co-counsel regarding status and next steps [.8].	1.6	\$ 775.00	\$ 1,240.00
5/30/2019	BET	Prepared for meet and confer with Mr. Payson[0.2]; personal conference with Mr. Payson regarding settlement[0.5].	0.7	\$ 775.00	\$ 542.50
6/3/2019	BET	Worked on discovery issues[0.2]; emails with defense counsel regarding 26(f) and other scheduling issues [.2].	0.2	\$ 775.00	\$ 155.00
6/4/2019	BET	Worked on scheduling issues [.1].	0.1	\$ 775.00	\$ 77.50
6/5/2019	BET	Worked on Joint prosecution agreement [.3]; emails with co-counsel regarding same [.1].	0.4	\$ 775.00	\$ 310.00
6/11/2019	BET	Worked on discovery requests [.4].	0.4	\$ 775.00	\$ 310.00
7/1/2019	BET	Emails with defense counsel regarding discovery matters [.3].	0.3	\$ 775.00	\$ 232.50
7/10/2019	BET	Reviewed JSR [.2]; worked on discovery matters [.1].	0.3	\$ 775.00	\$ 232.50
8/7/2019	BET	Worked on discovery matters [.3].	0.3	\$ 775.00	\$ 232.50
8/15/2019	BET	Worked on discovery matters [.6].	0.6	\$ 775.00	\$ 465.00
		Telephone conference with opposing counsel regarding discovery issues [1.0].			
8/23/2019	BET		1	\$ 775.00	\$ 775.00
9/28/2019	BET	Worked on discovery and deposition scheduling issues [.3].	0.3	\$ 775.00	\$ 232.50
10/9/2019	BET	Worked on discovery issues [.2].	0.3	\$ 775.00	\$ 232.50
11/5/2019	BET	Worked on deposition scheduling issues [.3].	0.3	\$ 775.00	\$ 232.50
1/14/2020	BET	Telephone conference with co-counsel regarding discovery strategy. [1]	1	\$ 775.00	\$ 775.00
1/17/2020	BET	Worked on discovery matters [.6].	0.6	\$ 775.00	\$ 465.00
4/1/2020	BET	Worked on expert issues [.8].	0.8	\$ 775.00	\$ 620.00
4/2/2020	BET	Telephone conference regarding objections to depositions [0.8]; followed up with same [0.3].	1.1	\$ 775.00	\$ 852.50
4/14/2020	BET	Worked on deposition scheduling issues [.3].	0.3	\$ 775.00	\$ 232.50
4/17/2020	BET	Worked on deposition protocol [.2].	0.2	\$ 775.00	\$ 155.00
5/8/2020	BET	Analyzed expert issues [.4].	0.4	\$ 775.00	\$ 310.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/14/2020	BET	Analyzed deposition scheduling and vicarious liability issues [1.2].	1.2	\$ 775.00	\$ 930.00
5/18/2020	BET	Analyzed vicarious liability issues and commenced preparing for depositions [3.2].	3.2	\$ 775.00	\$ 2,480.00
5/20/2020	BET	Telephone conference with co-counsel regarding deposition preparation [1]; work on deposition preparation [6.2].	7.3	\$ 775.00	\$ 5,657.50
5/21/2020	BET	Emails with defense counsel regarding discovery matters [.3]; continued preparing for depositions [6.2].	6.5	\$ 775.00	\$ 5,037.50
		Telephone conference with all co-counsel regarding document review and deposition preparation [1]; continued preparing for depositions [3.2].			
5/22/2020	BET		4.2	\$ 775.00	\$ 3,255.00
5/24/2020	BET	Continued preparing for depositions [3.8].	3.8	\$ 775.00	\$ 2,945.00
		Telephone conference with co-counsel regarding current deposition preparation [.7]; continued preparing for depositions [4.2].			
5/27/2020	BET		4.9	\$ 775.00	\$ 3,797.50
5/28/2020	BET	Telephone conference with co-counsel regarding deposition preparation [1]; prepared for deposition [9.2].	10.3	\$ 775.00	\$ 7,982.50
		Prepared for deposition of Mr. Swindle [4.8]; participated in deposition of Mr. Swindle [8.1]; discussed same with co-counsel [.5].			
5/29/2020	BET		13.4	\$ 775.00	\$ 10,385.00
5/30/2020	BET	Prepared for depositions [4.2].	4.2	\$ 775.00	\$ 3,255.00
6/1/2020	BET	Worked on discovery and deposition issues [.8].	0.8	\$ 775.00	\$ 620.00
6/2/2020	BET	Attended Seastrand deposition [7.2]; analyzed same [.6]; prepared for McKnight deposition [5.2].	13	\$ 775.00	\$ 10,075.00
		Prepared for McKnight deposition [6.2]; attended McKnight deposition [6.5]; followed up with co-counsel regarding same [0.3].			
6/3/2020	BET		13	\$ 775.00	\$ 10,075.00
		Telephone conferences with co-counsel regarding case status and discovery [.9]; analyzed deposition outline and coverage of same [1.2].			
6/4/2020	BET	Telephone conference with co-counsel regarding deposition and additional discovery [.6]; attended	2.1	\$ 775.00	\$ 1,627.50
6/5/2020	BET	Ranneberg deposition [5.5].	6.1	\$ 775.00	\$ 4,727.50
6/10/2020	BET	Exchanged emails with co-counsel regarding strategy for reply expert reports [.3].	0.3	\$ 775.00	\$ 232.50
		Telephone conference with co-counsel to discuss expert rebuttal reports [1.2].			
6/15/2020	BET		1.2	\$ 775.00	\$ 930.00
		Meet and confer conference with defense counsel [.6]; telephone conference with co-counsel regarding Hansen rebuttal report [.5].			
6/17/2020	BET		1.1	\$ 775.00	\$ 852.50
6/19/2020	BET	Exchanged emails with all counsel regarding deposition scheduling [.2].	0.2	\$ 775.00	\$ 155.00
		Telephone conference with Ms. Chandler regarding preparation for Ms. Anderson's deposition [.1]; prepared for deposition [6.2].			
6/26/2020	BET	Telephone conference with co-counsel regarding strategy for Christie Anderson deposition [.5]; follow up call with Ms. Chandler regarding same [1.1]; prepared for deposition [4.8].	6.3	\$ 775.00	\$ 4,882.50
6/29/2020	BET		5.4	\$ 775.00	\$ 4,185.00
		Reviewed email correspondence from Ms. Fairchild regarding status of discovery disputes and exchanged emails with co-counsel regarding same [.5]. Exchanged emails with co-counsel regarding scheduling client deposition [.1]			
7/1/2020	BET	Exchanged emails and telephone calls with co-counsel regarding canceling deposition of Ken Sponsler [.4].	0.6	\$ 775.00	\$ 465.00
7/2/2020	BET		0.4	\$ 775.00	\$ 310.00

Date	Timekeeper	Narrative	Units	Rate	Value
7/15/2020	BET	Worked with Ms. Chandler on preparation for Anderson deposition [.6]. Telephone conference with Ms. Murray and Ms. Chandler regarding case management and depositions preparation [1]; prepared for deposition [3.2].	4.8	\$ 775.00	\$ 3,720.00
7/16/2020	BET	Telephone conference with co-counsel regarding preparation for Anderson deposition [1.2]; continued preparing for deposition [3.2].	4.4	\$ 775.00	\$ 3,410.00
7/17/2020	BET	Prepared for deposition of Christina Anderson [4]; participated in deposition [5]; discussed deposition and case status with co-counsel [1].	10	\$ 775.00	\$ 7,750.00
7/21/2020	BET	Telephone conference with co-counsel regarding deposition preparation [0.7].	0.7	\$ 775.00	\$ 542.50
7/22/2020	BET	Email to co-counsel regarding requested production from third party [.1]; worked on class certification briefing [.6].	0.7	\$ 775.00	\$ 542.50
7/23/2020	BET	Reviewed and revised motion for class certification [2.3].	2.3	\$ 775.00	\$ 1,782.50
7/24/2020	BET	Worked on class certification motion [1.2]; analyzed subclass issues [.2].	1.4	\$ 775.00	\$ 1,085.00
7/28/2020	BET	Exchanged emails with co-counsel regarding sealed documents [.1].	0.1	\$ 775.00	\$ 77.50
7/31/2020	BET	Reviewed memo from co-counsel regarding response to motion to stay; exchanged emails with co-counsel regarding same [.5].	0.5	\$ 775.00	\$ 387.50
8/4/2020	BET	Reviewed proposal from PillPack regarding sealed and redacted documents, discussed same with co-counsel [.6].	0.6	\$ 775.00	\$ 465.00
8/6/2020	BET	Email to co-counsel regarding Anderson production of calendar entries [.2].	0.2	\$ 775.00	\$ 155.00
8/10/2020	BET	Worked on response to stay [.8]; emails regarding same [.2].	1	\$ 775.00	\$ 775.00
8/18/2020	BET	Worked on discovery matters [.2].	0.2	\$ 775.00	\$ 155.00
8/19/2020	BET	Email to co-counsel regarding responding to PillPack's motion for protective order [.1].	0.1	\$ 775.00	\$ 77.50
8/25/2020	BET	Discussed analysis of class certification response with co-counsel [2.5].	2.5	\$ 775.00	\$ 1,937.50
8/26/2020	BET	Exchanged emails with counsel for PillPack regarding discovery dispute [.1].	0.1	\$ 775.00	\$ 77.50
9/2/2020	BET	Reviewed and revised reply re motion for class certification [1.9].	1.9	\$ 775.00	\$ 1,472.50
9/3/2020	BET	Worked on discovery matters [.2]; emails with defense counsel regarding same [.2].	0.4	\$ 775.00	\$ 310.00
9/4/2020	BET	Reviewed and revised reply brief [3.2]; emails with defense counsel regarding discovery matters [.2].	3.4	\$ 775.00	\$ 2,635.00
9/8/2020	BET	Email to co-counsel regarding needed correction to reply in support of class certification [.2].	0.2	\$ 775.00	\$ 155.00
9/9/2020	BET	Telephone conference with co-counsel regarding response to motion for summary judgment strategy [1.5].	1.5	\$ 775.00	\$ 1,162.50
9/10/2020	BET	Email to co-counsel regarding PillPack motion to seal [.1].	0.1	\$ 775.00	\$ 77.50
9/11/2020	BET	Revised opposition to motion to supplement [.4].	0.4	\$ 775.00	\$ 310.00
9/14/2020	BET	Worked on discovery matters [1.2]; worked on briefing [.2].	1.4	\$ 775.00	\$ 1,085.00
9/15/2020	BET	Meet and confer conference with counsel for PillPack regarding outstanding discovery [.5].	0.5	\$ 775.00	\$ 387.50
9/21/2020	BET	Revised response to summary judgment motion [2.8].	2.8	\$ 775.00	\$ 2,170.00
9/28/2020	BET	Prepared for Fluent deposition[3.5].	3.5	\$ 775.00	\$ 2,712.50
10/1/2020	BET	Telephone conference regarding [REDACTED] [0.7].	0.7	\$ 775.00	\$ 542.50
10/7/2020	BET	Exchanged emails with co-counsel regarding subpoena to Fluent [.2].	0.2	\$ 775.00	\$ 155.00
10/9/2020	BET	Exchanged emails with co-counsel regarding Fluent subpoenas [.3].	0.3	\$ 775.00	\$ 232.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/15/2020	BET	Exchanged emails with co-counsel regarding Fluent subpoenas [.3].	0.3	\$ 775.00	\$ 232.50
10/28/2020	BET	Telephone conferences with investigator regarding [REDACTED] [.3]; telephone conference with co-counsel regarding same [.4]; exchanged emails with co-counsel regarding same [.2].	0.9	\$ 775.00	\$ 697.50
11/4/2020	BET	Exchanged emails with co-counsel and counsel for PillPack regarding discovery matters [.6].	0.6	\$ 775.00	\$ 465.00
11/9/2020	BET	Meet and confer with defense counsel [.4].	0.4	\$ 775.00	\$ 310.00
12/21/2020	BET	Revised motion to supplement [.4].	0.4	\$ 775.00	\$ 310.00
1/8/2021	BET	Read and analyzed summary judgment order; exchanged emails with co-counsel regarding same [.4].	0.4	\$ 775.00	\$ 310.00
1/14/2021	BET	Revised reply re motion to supplement and seal [.3].	0.3	\$ 775.00	\$ 232.50
1/14/2021	BET	Read and analyzed minute order on supplemental briefing; telephone call from co-counsel regarding same [.3].	0.3	\$ 775.00	\$ 232.50
1/15/2021	BET	Telephone conference with co-counsel regarding strategy for supplements brief [.5].	0.5	\$ 775.00	\$ 387.50
1/21/2021	BET	Telephone conference with co-counsel regarding supplemental brief [.4].	0.4	\$ 775.00	\$ 310.00
1/22/2021	BET	Exchanged emails with co-counsel regarding meet and confer; scheduled same [.1].	0.1	\$ 775.00	\$ 77.50
1/28/2021	BET	Discussed issues related to case schedule and joint status report with co-counsel. [.4].	0.4	\$ 775.00	\$ 310.00
1/29/2021	BET	Telephone call with co-counsel regarding Plaintiff's supplemental brief on class certification [.3].	0.3	\$ 775.00	\$ 232.50
2/3/2021	BET	Telephone call with co-counsel regarding supplemental brief on class certification. [.4].	0.4	\$ 775.00	\$ 310.00
2/4/2021	BET	Telephone call with co-counsel regarding supplemental briefing. [.3]; revised supplemental brief [.4].	0.7	\$ 775.00	\$ 542.50
2/5/2021	BET	Telephone conference with co-counsel regarding joint status report [.4].	0.4	\$ 775.00	\$ 310.00
2/12/2021	BET	Reviewed and analyzed class certification decision [.4].	0.4	\$ 775.00	\$ 310.00
2/12/2021	BET	Read and analyzed class certification order; telephone conferences with co-counsel regarding same [2.5].	2.5	\$ 775.00	\$ 1,937.50
2/16/2021	BET	Discussed issues related to notice plan with co-counsel [.5].	0.5	\$ 775.00	\$ 387.50
2/26/2021	BET	Reviewed motion for reconsideration [.4].	0.4	\$ 775.00	\$ 310.00
2/27/2021	BET	Exchanged emails with co-counsel regarding motion for reconsideration and case deadlines [.3].	0.3	\$ 775.00	\$ 232.50
3/9/2021	BET	Analyzed notice issues [.6].	0.6	\$ 775.00	\$ 465.00
3/11/2021	BET	Exchanged emails with co-counsel regarding contents of notice website [.2]; telephone call with co-counsel regarding same [.2]; telephone call with co-counsel regarding response to defense counsel regarding Plaintiffs' proposed notice plan [.4]; Exchanged emails with co-counsel regarding subpoena issues [.2].	1	\$ 775.00	\$ 775.00
3/17/2021	BET	Exchanged emails with co-counsel regarding case status and strategy [.2].	0.2	\$ 775.00	\$ 155.00

Date	Timekeeper	Narrative	Units	Rate	Value
3/30/2021	BET	Video conference with co-counsel regarding class data and subpoena follow up [.5].	0.5	\$ 775.00	\$ 387.50
4/1/2021	BET	Exchanged emails with co-counsel regarding Supreme Court's decision in Facebook [.1]; revised brief [1.4]; emails regarding same [.1].	1.6	\$ 775.00	\$ 1,240.00
4/2/2021	BET	Revised notice brief [.4].	0.4	\$ 775.00	\$ 310.00
4/6/2021	BET	Read and analyzed court's order regarding class notice; strategized with co-counsel regarding same [.9].	0.9	\$ 775.00	\$ 697.50
4/13/2021	BET	Telephone conference with co-counsel [1.0]; prepared for same [.6].	1.6	\$ 775.00	\$ 1,240.00
4/16/2021	BET	Attended conference call with defense counsel [.5].	0.5	\$ 775.00	\$ 387.50
4/20/2021	BET	Revised JSR.	0.6	\$ 775.00	\$ 465.00
4/23/2021	BET	Revised JSR [.2]; reviewed supplemental privilege log [.2].	0.4	\$ 775.00	\$ 310.00
4/28/2021	BET	Video conference with co-counsel regarding data produced by Yodel [.9]; telephone call with co-counsel regarding same [.4]; drafted letter to defense counsel [.2].	1.5	\$ 775.00	\$ 1,162.50
5/5/2021	BET	Email to defense counsel regarding improperly withheld documents [.2].	0.2	\$ 775.00	\$ 155.00
5/10/2021	BET	Discussed [REDACTED] with co-counsel [1.2]; exchanged emails with co-counsel regarding lead provider subpoenas; telephone conference with co-counsel regarding third party subpoena follow up [.6]	1.8	\$ 775.00	\$ 1,395.00
5/12/2021	BET	Attended video conference with co-counsel [1.2].	1.2	\$ 775.00	\$ 930.00
5/14/2021	BET	Telephone conference with co-counsel regarding subpoena issues [.2].	0.2	\$ 775.00	\$ 155.00
6/1/2021	BET	Drafted JSR [.6].	0.6	\$ 775.00	\$ 465.00
9/5/2021	BET	Discussed case management and strategy with co-counsel [.7].	0.7	\$ 775.00	\$ 542.50
9/20/2021	BET	Discussed issues related to Fluent deposition with co-counsel [.1]; Video conference with co-counsel regarding preparation and management of upcoming depositions [.6].	0.7	\$ 775.00	\$ 542.50
9/23/2021	BET	Telephone conference with co-counsel regarding strategy issues [0.5].	0.5	\$ 775.00	\$ 387.50
9/24/2021	BET	Discussed Fluent deposition with co-counsel [.2] worked on outline and prepared for Tyler Hunt deposition [5].	5.2	\$ 775.00	\$ 4,030.00
9/26/2021	BET	Prepared for Tyler Hunt deposition [5].	5	\$ 775.00	\$ 3,875.00
9/28/2021	BET	Prepared for and participated in Tyler Hunt deposition [8]; discussed Fluent deposition strategy [1]; prepared for Fluent deposition [3].	12	\$ 775.00	\$ 9,300.00
9/29/2021	BET	Prepared for and attended deposition of Fluent, Inc. [8].	8	\$ 775.00	\$ 6,200.00
10/6/2021	BET	Discussed deposition of Josh Grant with co-counsel [.5].	0.5	\$ 775.00	\$ 387.50
10/14/2021	BET	Exchanged emails with co-counsel regarding briefing schedule for motion to amend class definition [.2].	0.2	\$ 775.00	\$ 155.00
11/3/2021	BET	Read and analyzed court's order decertifying class [.6]; discussed same with co-counsel [.5].	1.1	\$ 775.00	\$ 852.50
11/9/2021	BET	Video conference with co-counsel regarding moving to certify narrowed class and related discovery matters [1.4].	1.4	\$ 775.00	\$ 1,085.00
11/16/2021	BET	Video conference with co-counsel regarding strategy for renewed motion for class certification [1.5].	1.5	\$ 775.00	\$ 1,162.50
11/22/2021	BET	Telephone call with client and co-counsel [1].	1	\$ 775.00	\$ 775.00
12/20/2021	BET	Telephone conference with consulting expert regarding Vestige report [1.0] analyzed next steps [.4].	1.4	\$ 775.00	\$ 1,085.00
12/27/2021	BET	Telephone call with co-counsel regarding client communications [1].	1	\$ 775.00	\$ 775.00
1/4/2022	BET	Worked on protective order issues [.4].	0.4	\$ 775.00	\$ 310.00

Date	Timekeeper	Narrative	Units	Rate	Value
1/7/2022	BET	Worked on protective order issues [.4].	0.4	\$ 775.00	\$ 310.00
4/21/2022	BET	Revised motion for class certification [1.2].	1.2	\$ 775.00	\$ 930.00
6/2/2022	BET	Worked on reply brief.	0.9	\$ 775.00	\$ 697.50
6/3/2022	BET	Worked on reply brief.	0.8	\$ 775.00	\$ 620.00
7/1/2022	BET	Worked on response to SJ motion.	1.2	\$ 775.00	\$ 930.00
12/5/2022	BET	Read and analyzed order denying motion for summary judgment [.5]; discussed same with co-counsel [.5].	1	\$ 775.00	\$ 775.00
12/23/2022	BET	Read and analyzed order granting class certification [.8]; discussed issues related to same with co-counsel [.5].	1.3	\$ 775.00	\$ 1,007.50
		Exchanged emails with co-counsel regarding data analysis from Ms. Nuss. [.2].			
1/4/2023	BET		0.2	\$ 775.00	\$ 155.00
1/24/2023	BET	Exchanged emails with co-counsel and Epiq regarding notice [.2].	0.2	\$ 775.00	\$ 155.00
		Exchanged emails with co-counsel regarding court email requesting scheduling conference availability [.2].			
2/6/2023	BET		0.2	\$ 775.00	\$ 155.00
2/14/2023	BET	Telephone call with co-counsel regarding reply supporting notice plan [.1].	0.1	\$ 775.00	\$ 77.50
3/24/2023	BET	Exchanged emails with co-counsel regarding notice issues [.2].	0.2	\$ 775.00	\$ 155.00
4/6/2023	BET	Discussed class data issues with co-counsel [.4].	0.4	\$ 775.00	\$ 310.00
9/14/2023	BET	Exchanged email with co-counsel regarding court proposed hearing date on motion to compel [.1]	0.1	\$ 775.00	\$ 77.50
10/3/2023	BET	Worked with co-counsel on issues related to notice administration [.4]; telephone call related to same [.2].	0.6	\$ 775.00	\$ 465.00
10/5/2023	BET	Discussed court ruling on motion to compel with co-counsel and strategized regarding response to same [.5]	0.5	\$ 775.00	\$ 387.50
10/9/2023	BET	Discussed case management with co-counsel [.2].	0.2	\$ 775.00	\$ 155.00
11/14/2023	BET	Exchanged emails with co-counsel regarding opt-outs declaration [.2]	0.2	\$ 775.00	\$ 155.00
		Exchanged emails with co-counsel regarding data analysis in advance of expert disclosure date [.2].			
1/11/2024	BET		0.2	\$ 775.00	\$ 155.00
1/26/2024	BET	Exchanged emails with co-counsel regarding agreement with Epiq [.1]	0.1	\$ 775.00	\$ 77.50
2/9/2024	BET	Video conference with co-counsel regarding case management [1].	1	\$ 775.00	\$ 775.00
		Email to co-counsel regarding contents of expert report [.3].			
2/19/2024	BET		0.3	\$ 775.00	\$ 232.50
		Discussed meet and confer regarding potential mediation with co-counsel[.8].			
2/28/2024	BET		0.8	\$ 775.00	\$ 620.00
2/29/2024	BET	Exchanged further communications with co-counsel regarding potential mediators [.2].	0.2	\$ 775.00	\$ 155.00
3/1/2024	BET	Worked on mediation issues.	0.6	\$ 775.00	\$ 465.00
		Worked on mediation issues [.4].			
3/19/2024	BET		0.4	\$ 775.00	\$ 310.00
		Exchanged emails to all counsel regarding mediation scheduling logistics [.1].			
3/25/2024	BET		0.1	\$ 775.00	\$ 77.50
		Worked on mediation issues [.2].			
5/8/2024	BET		0.2	\$ 775.00	\$ 155.00
		Worked with co-counsel on scheduling mediation preparation session with client [.1].			
5/23/2024	BET		0.1	\$ 775.00	\$ 77.50
		Worked on mediation issues [.4].			
5/24/2024	BET		0.4	\$ 775.00	\$ 310.00
		Worked on mediation issues.			
5/24/2024	BET		1.3	\$ 775.00	\$ 1,007.50

Date	Timekeeper	Narrative	Units	Rate	Value
5/28/2024	BET	Reviewed plaintiff's mediation submission [.8]. Reviewed defendant's mediation submission and analyzed issues regarding same [1]; conferred with co-counsel regarding strategy about same[1.0].	0.8	\$ 775.00	\$ 620.00
5/29/2024	BET		2	\$ 775.00	\$ 1,550.00
6/4/2024	BET	Traveled to Los Angeles for mediation[9.5].	8.5	\$ 775.00	\$ 6,587.50
6/5/2024	BET	Attended mediation [6.0]; return travel from mediation [8.5]. Exchanged emails to client and co-counsel regarding extension of time for PillPack's response to mediator's proposal [.2].	14.5	\$ 775.00	\$ 11,237.50
6/10/2024	BET	Reviewed stipulation to extend stay; discussed with co-counsel [.2].	0.2	\$ 775.00	\$ 155.00
6/11/2024	BET	Reviewed settlement agreement [.3].	0.2	\$ 775.00	\$ 155.00
6/20/2024	BET	Worked with co-counsel on response to PillPack proposed revision to settlement agreement [.4].	0.3	\$ 775.00	\$ 232.50
7/29/2024	BET	Discussed settlement administration bid with co-counsel [.4].	0.4	\$ 775.00	\$ 310.00
8/16/2024	BET		0.4	\$ 775.00	\$ 310.00
		Statement Professional: Beth Terrell	285.8		\$ 221,495.00
5/18/2020	BHC	Telephone conference with co-counsel regarding deposition preparation [.5]. Personal meeting with Ms. Terrell regarding work on case [.2].	0.7	\$ 600.00	\$ 420.00
5/20/2020	BHC	Telephone conference with co-counsel regarding deposition preparation [1]; telephone conference with Ms. Boschen regarding same [.4]; reviewed documents [.2].	1.6	\$ 600.00	\$ 960.00
5/22/2020	BHC	Telephone conference with all co-counsel regarding document review and deposition preparation [1].	1	\$ 600.00	\$ 600.00
5/24/2020	BHC	Reviewed documents and prepared timeline and related documents in preparation for depositions. Telephone conference with Ms. Murray regarding document review and deposition preparation [.9].	7.6	\$ 600.00	\$ 4,560.00
5/26/2020	BHC	Exchanged emails with co-counsel regarding deposition staffing [.1]. Reviewed and analyzed documents in preparation for writing Rule 30(b)(6) deposition outline [3].	4	\$ 600.00	\$ 2,400.00
5/27/2020	BHC	Worked on Rule 30(b)(6) deposition outline [6.5]; telephone conference with co-counsel regarding current deposition preparation [.7].	7.2	\$ 600.00	\$ 4,320.00
5/28/2020	BHC	Participated in zoom deposition training with US Legal support [.5]. Telephone conference with co-counsel regarding deposition preparation [1]. Worked on Rule 30(b)(6) data topics outline [2.5].	4	\$ 600.00	\$ 2,400.00
5/29/2020	BHC	Organized exhibits and assisted with preparation for Rule 30(b)(6) deposition [1.8]. Participated in Rule 30(b)(6) deposition [8.1]; discussed same with co-counsel [.3].	10.2	\$ 600.00	\$ 6,120.00
5/30/2020	BHC	Worked on Jesse Seastrand deposition outline [6.5].	6.5	\$ 600.00	\$ 3,900.00
6/1/2020	BHC	Prepared for deposition of Seastrand [5.4].	5.4	\$ 600.00	\$ 3,240.00
6/2/2020	BHC	Prepared for deposition of Jesse Seastrand [1]; deposition of Jesse Seastrand [7.2].	8.2	\$ 600.00	\$ 4,920.00
6/3/2020	BHC	Worked with co-counsel on organization of exhibits in advance of McKnight deposition [1]. Participated in McKnight deposition [6.5]. Updated document chronology to include exhibit numbers for marked exhibits [.7].	8.2	\$ 600.00	\$ 4,920.00
6/4/2020	BHC	Telephone conferences with co-counsel regarding case status and discovery [.9]. Worked on outline for Ranneberg deposition [4.8]. Prepared for Ranneberg deposition [1.8].	7.5	\$ 600.00	\$ 4,500.00
6/5/2020	BHC	Prepared for Ranneberg deposition [1]. Deposition of Ranneberg [5.5]. Telephone conference with co-counsel regarding deposition and additional discovery [.6]. Follow up email to staff regarding court reporter's questions [.1].	7.2	\$ 600.00	\$ 4,320.00
6/8/2020	BHC	Worked on letter to PillPack regarding discovery deficiencies and second set of requests for production.	3.4	\$ 600.00	\$ 2,040.00
6/10/2020	BHC	Exchanged emails with co-counsel regarding strategy for reply expert reports [.3].	0.3	\$ 600.00	\$ 180.00

Date	Timekeeper	Narrative	Units	Rate	Value
6/12/2020	BHC	Read and analyzed Sponsler and Smith expert reports and worked on issues related to data analysis for expert rebuttal reports [4.5]; reviewed documents related to same [.5]. Email to defense counsel following up on meet and confer letter [.1].	5.1	\$ 600.00	\$ 3,060.00
6/15/2020	BHC	Telephone conferences with co-counsel to discuss expert rebuttal reports [1.2]. Responded to court reporter request for copies of exhibits [.1].	1.3	\$ 600.00	\$ 780.00
6/16/2020	BHC	Scheduled meet and confer with defense counsel [.1]. Worked on rebuttal expert report [1.4]	1.5	\$ 600.00	\$ 900.00
6/17/2020	BHC	Worked on Verkhovskaya rebuttal expert report [3.9]. Meet and confer conference with defense counsel [.6]; prepared for same [.2]; follow up summary to co-counsel regarding same; further email exchanges regarding information about joint defense agreement from counsel for Prospects DM [.3]. Telephone conference with co-counsel regarding Hansen rebuttal report [.5].	5.5	\$ 600.00	\$ 3,300.00
6/18/2020	BHC	Email to Ms. Verkhovskaya to confirm status of rebuttal expert report [.1]. Follow up email to defense counsel regarding request for deposition dates [.1].	0.2	\$ 600.00	\$ 120.00
6/19/2020	BHC	Worked on Verkhovskaya reply expert report [4.2]. Exchanged emails with co-counsel regarding case deadlines [.1]. Worked on Hansen expert rebuttal report [1]. Exchanged emails with all counsel regarding deposition scheduling [.2]. Telephone calls with Ms. Verkhovskaya regarding rebuttal report [.2]; follow up emails regarding same [.1].	5.8	\$ 600.00	\$ 3,480.00
6/23/2020	BHC	Read deposition transcripts in preparation for Christie Anderson deposition and motion for class certification.	1.7	\$ 600.00	\$ 1,020.00
6/24/2020	BHC	Read Ranneberg and Swindle deposition transcripts in preparation for Anderson deposition and class certification motion [6.5].	6.5	\$ 600.00	\$ 3,900.00
6/25/2020	BHC	Worked on Anderson deposition outline [4]; reviewed documents related to same [1].	5	\$ 600.00	\$ 3,000.00
6/26/2020	BHC	Telephone conference with Ms. Terrell regarding preparation for Ms. Anderson's deposition [.1]. Email to defense counsel requesting update on topics discussed at last meet and confer [.5].	0.6	\$ 600.00	\$ 360.00
6/26/2020	BHC	Worked on Christie Anderson deposition outline.	2.6	\$ 600.00	\$ 1,560.00
6/29/2020	BHC	Telephone conference with co-counsel regarding strategy for Christie Anderson deposition [.5]; follow up call with Ms. Terrell regarding same [1.1]. Revised Anderson deposition outline [4.8].	6.4	\$ 600.00	\$ 3,840.00
6/30/2020	BHC	Legal research regarding Plaintiffs' motion for class certification.	1.9	\$ 600.00	\$ 1,140.00
7/1/2020	BHC	Reviewed email correspondence from Ms. Fairchild regarding status of discovery disputes and exchanged emails with co-counsel regarding same [.5]. Exchanged emails with co-counsel regarding scheduling client deposition; email to Ms. Rainwater regarding same [.2].	0.7	\$ 600.00	\$ 420.00
7/1/2020	BHC	Legal research in preparation for work on motion for class certification [1.5]. Read deposition transcripts in preparation for motion for class certification [1.8].	3.3	\$ 600.00	\$ 1,980.00
7/2/2020	BHC	Exchanged emails and telephone calls with co-counsel and staff regarding canceling deposition of Ken Sponsler [.4].	0.4	\$ 600.00	\$ 240.00
7/13/2020	BHC	Legal research regarding motion for class certification [1.5].	1.5	\$ 600.00	\$ 900.00
7/14/2020	BHC	Legal research regarding Plaintiffs' motion for class certification [1.5]. Worked on Plaintiff's motion for class certification [2.5].	4	\$ 600.00	\$ 2,400.00
7/15/2020	BHC	Worked with Ms. Terrell on preparation for Anderson deposition [.6]. Exchanged emails with all counsel regarding remote deposition logistics [.2]. Telephone conference with Ms. Murry and Ms. Terrell regarding case management and depositions preparation [1]; worked on outline [.5]. Legal research regarding Plaintiffs' motion for class certification [3.5]; worked on same [1.5].	7.3	\$ 600.00	\$ 4,380.00
7/16/2020	BHC	Telephone conference with co-counsel regarding preparation for Anderson deposition [1.2]. Reviewed documents produced by PillPack on July 15 in preparation for deposition and class certification motion [1.2]. Worked on class certification motion [4.5]. Additional work on deposition exhibit preparation [1.5].	8.4	\$ 600.00	\$ 5,040.00
7/17/2020	BHC	Prepared for deposition of Christina Anderson [.5]; participated in deposition [5]; discussed deposition and case status with co-counsel [1]. Worked with staff on transcript order [.1].	6.6	\$ 600.00	\$ 3,960.00
7/18/2020	BHC	Worked on Plaintiffs' motion for class certification [4.9].	4.9	\$ 600.00	\$ 2,940.00
7/20/2020	BHC	Worked on Plaintiff's motion for class certification [7.5].	7.5	\$ 600.00	\$ 4,500.00
7/21/2020	BHC	Worked on motion for class certification [5.5].	5.5	\$ 600.00	\$ 3,300.00

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7/22/2020	BHC	Email to counsel providing list of documents and testimony designated confidential and included in brief [.4].	6.4	\$ 600.00	\$ 3,840.00
7/23/2020	BHC	Worked on motion for class certification [5.9]. Email to co-counsel regarding requested production from third party [.1].	9.2	\$ 600.00	\$ 5,520.00
7/24/2020	BHC	Worked on Plaintiffs' motion for class certification and all documents to be filed in support of same [11.5].	11.5	\$ 600.00	\$ 6,900.00
7/27/2020	BHC	Reviewed class certification filings for any issues [.5].	0.5	\$ 600.00	\$ 300.00
7/28/2020	BHC	Exchanged emails with co-counsel regarding sealed documents [.1].	0.1	\$ 600.00	\$ 60.00
7/30/2020	BHC	Reviewed invoices from US Legal for Anderson deposition and drafted email to Mr. Dyer regarding same [.2].	0.2	\$ 600.00	\$ 120.00
7/31/2020	BHC	Reviewed memo from co-counsel regarding response to motion to stay; exchanged emails with co-counsel regarding same [.5].	0.5	\$ 600.00	\$ 300.00
8/3/2020	BHC	Worked on response to PillPack's motion for stay [1.5].	1.5	\$ 600.00	\$ 900.00
8/4/2020	BHC	Reviewed proposal from PillPack regarding sealed and redacted documents, discussed same with co-counsel and responded to same [.6]. Worked on response to motion to stay [4.5].	5.1	\$ 600.00	\$ 3,060.00
8/5/2020	BHC	Worked on motion to stay [4].	4	\$ 600.00	\$ 2,400.00
8/6/2020	BHC	Analyzed PillPack's proposal to redact email communications; email to Ms. Rainwater regarding same [.2]. Reviewed edits and comments to response to motion to stay from co-counsel and revised brief consistent with same [.7]. Email to co-counsel regarding Anderson production of calendar entries [.2].	1.1	\$ 600.00	\$ 660.00
8/10/2020	BHC	Worked on response to PillPack's motion to stay [1.5]; revised same and approved brief and declaration for filing [.7]; drafted motion to seal in support of same [.2].	2.4	\$ 600.00	\$ 1,440.00
8/11/2020	BHC	Read and analyzed PillPack's response to motion to seal; legal research regarding same [.9]. Drafted reply regarding motion to seal [4.5].	5.4	\$ 600.00	\$ 3,240.00
8/17/2020	BHC	Meet and confer with counsel for PillPack regarding current discovery disputes [.4]. Exchanged emails with defense counsel regarding ruling on motion to seal and correcting same [.2].	0.6	\$ 600.00	\$ 360.00
8/18/2020	BHC	Email to defense counsel rejecting proposal to produce scrub against DNC list and proposing briefing schedule [.3]. Worked on revised proposed order on motion to seal [.6].	0.9	\$ 600.00	\$ 540.00
8/19/2020	BHC	Drafted and sent email message to the Court regarding agreed proposed order on sealing issues [.3]. Reviewed and approved stipulation regarding use of potential class member data [.2]. Email to co-counsel regarding responding to PillPack's motion for protective order [.1].	0.6	\$ 600.00	\$ 360.00
8/22/2020	BHC	Read and analyzed PillPack's response to class cert and supporting documents; outlined response and potential reply arguments; legal research related to same [5.3]	5.3	\$ 600.00	\$ 3,180.00
8/25/2020	BHC	Legal research regarding reply to PillPack's motion for class certification [1.9]; discussed analysis of class certification response with co-counsel [2.5].	4.4	\$ 600.00	\$ 2,640.00
8/26/2020	BHC	Exchanged emails with counsel for PillPack regarding discovery dispute [.1]. Worked on reply in support of class certification [5.6].	5.7	\$ 600.00	\$ 3,420.00
8/27/2020	BHC	Worked on reply in support of motion for class certification [7].	7	\$ 600.00	\$ 4,200.00
8/28/2020	BHC	Worked on reply in support of motion for class certification and legal research regarding same [9].	9	\$ 600.00	\$ 5,400.00
8/29/2020	BHC	Worked on reply in support of class certification [2.5].	2.5	\$ 600.00	\$ 1,500.00
9/1/2020	BHC	Read decision regarding Fluent leads for use in reply supporting motion for class certification [.2].	0.2	\$ 600.00	\$ 120.00
9/2/2020	BHC	Worked on reply in support of class certification [5.4]. Email to counsel for PillPack regarding request to supplement with all Barsky materials [5].	5.9	\$ 600.00	\$ 3,540.00
9/3/2020	BHC	Worked on reply in support of class certification [1.2]. Worked on motion to strike legal standards [.2]. Reviewed documents produced by PillPack regarding Barsky [1]. Reviewed and approved stipulation regarding page limits [.1]. Email to Ms. Rainwater regarding request to remove confidentiality designations [.1]. Worked on reply in support of motion for class certification [7].	1.4	\$ 600.00	\$ 840.00
9/4/2020	BHC	Check filings supporting reply in support of class certification; email to co-counsel regarding needed correction to same [.2]. Email to staff regarding Yodel document production [.1].	8.2	\$ 600.00	\$ 4,920.00
9/8/2020	BHC		0.3	\$ 600.00	\$ 180.00

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9/9/2020	BHC	Read and analyzed PillPack's motion for summary judgment [.5]. Telephone conference with co-counsel regarding response to motion for summary judgment strategy [1.5].	2	\$ 600.00	\$ 1,200.00
9/10/2020	BHC	Email to co-counsel regarding PillPack motion to seal [.1]. Drafted email to PillPack regarding outstanding discovery issues [1].	1.1	\$ 600.00	\$ 660.00
9/11/2020	BHC	Worked on opposition to motion to supplement with Barsky declaration [.6].	0.6	\$ 600.00	\$ 360.00
9/14/2020	BHC	Research and analysis regarding response to PillPack's motion for summary judgment [3.5]. Worked on issues related to document production [.3]. Email to defense counsel rescheduling meet and confer [.1]. Worked on response to motion to supplement [.6].	4.5	\$ 600.00	\$ 2,700.00
9/15/2020	BHC	Legal research regarding response to motion for summary judgment [5.5]. Meet and confer conference with counsel for PillPack regarding outstanding discovery [.5].	6	\$ 600.00	\$ 3,600.00
9/16/2020	BHC	Worked on response to motion for summary judgment [5.5].	5.5	\$ 600.00	\$ 3,300.00
9/17/2020	BHC	Worked on response to motion for summary judgment [9.1].	9.1	\$ 600.00	\$ 5,460.00
9/18/2020	BHC	Worked on response to PillPack's motion for summary judgment [8.2].	8.2	\$ 600.00	\$ 4,920.00
9/19/2020	BHC	Worked on response to PillPack's motion for summary judgment [9.1].	9.1	\$ 600.00	\$ 5,460.00
9/20/2020	BHC	Worked on summary judgment response brief.	4.8	\$ 600.00	\$ 2,880.00
9/21/2020	BHC	Worked on response to PillPack's motion for summary judgment and supporting documents and exhibits [13].	13	\$ 600.00	\$ 7,800.00
9/22/2020	BHC	Re-read summary judgment response brief and confirmed accuracy of all filings [2].	2	\$ 600.00	\$ 1,200.00
10/1/2020	BHC	Telephone conference with Gryphon regarding potential witness investigation [.5].	0.5	\$ 600.00	\$ 300.00
10/6/2020	BHC	Worked on reply in support of motion to seal [3.5]. Discussed [REDACTED] [.3].	3.8	\$ 600.00	\$ 2,280.00
10/7/2020	BHC	Worked on reply in support of motion to unseal and approved same for filing [.5]. Exchanged emails with co-counsel regarding subpoena to Fluent [.2]. Corrected filing to remove all material over which PillPack asserts confidentiality from public record [.4]; exchanged emails with defense counsel regarding same [.1].	1.2	\$ 600.00	\$ 720.00
10/8/2020	BHC	Worked on issues related to subpoena to Fluent [.3].	0.3	\$ 600.00	\$ 180.00
10/9/2020	BHC	Exchanged emails with co-counsel regarding Fluent subpoenas [.3].	0.3	\$ 600.00	\$ 180.00
10/15/2020	BHC	Exchanged emails with co-counsel regarding subpoenas to Fluent [.1].	0.1	\$ 600.00	\$ 60.00
10/26/2020	BHC	Email to counsel for PillPack regarding discovery matters [.6].	0.6	\$ 600.00	\$ 360.00
10/28/2020	BHC	Email to Ms. Rainwater regarding discovery matters [.3]; exchanged emails with co-counsel regarding same [.2]. Telephone conferences with investigator regarding [REDACTED] [.3]; telephone conference with co-counsel regarding same [.4].	1.2	\$ 600.00	\$ 720.00
11/4/2020	BHC	Exchanged emails with co-counsel and counsel for PillPack regarding discovery matters [.6].	0.6	\$ 600.00	\$ 360.00
11/9/2020	BHC	Meet and confer with defense counsel [.4]. Discussed [REDACTED] with staff and co-counsel [.4].	0.8	\$ 600.00	\$ 480.00
11/10/2020	BHC	Worked with staff on [REDACTED] [.3].	0.3	\$ 600.00	\$ 180.00
11/12/2020	BHC	Reviewed and approved subpoenas for complaints to attorneys general and BBB [.3]. Read Court's order in related matter regarding Fluent data [.2].	0.5	\$ 600.00	\$ 300.00
11/13/2020	BHC	Worked on subpoena to Utah attorney general [.1].	0.1	\$ 600.00	\$ 60.00
11/19/2020	BHC	Email to defense counsel following up on list of recordings for PillPack to produce [.1].	0.1	\$ 600.00	\$ 60.00
11/20/2020	BHC	Responded to inquiry regarding subpoena seeking complaints [.1].	0.1	\$ 600.00	\$ 60.00
11/24/2020	BHC	Responded to emails regarding subpoena responses [.4].	0.4	\$ 600.00	\$ 240.00
11/30/2020	BHC	Worked on motion to supplement record regarding class certification [2].	2	\$ 600.00	\$ 1,200.00
11/30/2020	BHC	Reviewed and approved subpoena to BBB [.1]. Worked on motion to supplement regarding additional data produced by PillPack [1.5].	1.6	\$ 600.00	\$ 960.00
12/4/2020	BHC	Read sanctions order in matter involving Prospects DM [.2].	0.2	\$ 600.00	\$ 120.00
12/18/2020	BHC	Reviewed call recordings based on review by co-counsel to select recordings for inclusion in supplement to court [1.2].	1.2	\$ 600.00	\$ 720.00
12/21/2020	BHC	Worked on motion to supplement; sent same to co-counsel [5.5].	5.5	\$ 600.00	\$ 3,300.00

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12/22/2020	BHC	Worked on motion to supplement and all related document [4.5]. Email to defense counsel regarding confidentiality designations [.2]. Telephone call from Mr. Paronich regarding motion to supplement [.1].	4.8	\$ 600.00	\$ 2,880.00
12/23/2020	BHC	Approved notices renoting motions to supplement and seal; exchanged emails with co-counsel and defense counsel regarding same [.4].	0.4	\$ 600.00	\$ 240.00
1/7/2021	BHC	Reviewed Slack document production and discussed same with staff [.4]. Read and analyzed PillPack's opposition to motion to supplement [.4].	0.8	\$ 600.00	\$ 480.00
1/8/2021	BHC	Read and analyzed summary judgment order; exchanged emails with co-counsel regarding same [.4].	0.4	\$ 600.00	\$ 240.00
1/11/2021	BHC	Worked with staff on redactions per order on motion to seal [.2].	0.2	\$ 600.00	\$ 120.00
1/12/2021	BHC	Worked on document redactions [.2].	0.2	\$ 600.00	\$ 120.00
1/12/2021	BHC	Worked on reply in support of motion to seal and motion to supplement [3.9].	3.9	\$ 600.00	\$ 2,340.00
1/13/2021	BHC	Worked on reply in support of motion to supplement [5.9].	5.9	\$ 600.00	\$ 3,540.00
1/14/2021	BHC	Worked on reply in support of motion for leave to supplement; finalized same and approved for filing [1.1]. Worked with staff on filing reply in support of motion to seal and replacement exhibits [.2]. Read and analyzed minute order on supplemental briefing; telephone call from co-counsel regarding same [.3].	1.6	\$ 600.00	\$ 960.00
1/15/2021	BHC	Telephone conference with Mr. Drachler and Ms. Murray regarding strategy for supplements brief [.4]; telephone conference with co-counsel regarding same [.5]. Read Satterfield case in preparation for meeting with co-counsel [.5]. Worked with staff on issue related to second drive containing call recordings not subject to sealing; called case administrator regarding same [.3].	1.7	\$ 600.00	\$ 1,020.00
1/21/2021	BHC	Telephone conference with co-counsel regarding supplemental brief [.4]. Email to defense counsel requesting meet and confer per court's order [.1].	0.5	\$ 600.00	\$ 300.00
1/22/2021	BHC	Exchanged emails with co-counsel regarding meet and confer; scheduled same [.1].	0.1	\$ 600.00	\$ 60.00
1/27/2021	BHC	Legal research regarding supplemental brief on class certification [.4].	0.4	\$ 600.00	\$ 240.00
1/28/2021	BHC	Meet and confer with counsel for Pill Pack regarding case schedule and joint status report [.4]; discussed issues related to same with co-counsel [.3]. Legal research regarding supplemental brief on class certification [.5].	1.2	\$ 600.00	\$ 720.00
1/29/2021	BHC	Research regarding Plaintiff's supplemental brief on class certification [1]; telephone call with co-counsel regarding same [.3].	1.3	\$ 600.00	\$ 780.00
1/30/2021	BHC	Research related to supplemental brief on class certification [.2].	0.2	\$ 600.00	\$ 120.00
1/31/2021	BHC	Research related to supplemental brief on class certification [.3].	0.3	\$ 600.00	\$ 180.00
2/1/2021	BHC	Worked on Plaintiff's supplemental brief [5.9].	5.9	\$ 600.00	\$ 3,540.00
2/2/2021	BHC	Worked on Plaintiff's supplemental brief [6.3].	6.3	\$ 600.00	\$ 3,780.00
2/3/2021	BHC	Worked on supplemental brief on class certification. [3.7]; telephone call with co-counsel regarding same [.4].	4.1	\$ 600.00	\$ 2,460.00
2/4/2021	BHC	Worked on supplemental brief [2.4]. Telephone call with co-counsel regarding same [.3].	2.7	\$ 600.00	\$ 1,620.00
2/5/2021	BHC	Worked on Plaintiff's supplemental brief and joint status report for filing [1.9]. Telephone conference with co-counsel regarding joint status report [.4].	2.3	\$ 600.00	\$ 1,380.00
2/12/2021	BHC	Read and analyzed class certification order; telephone conferences with co-counsel regarding same [2.5].	2.5	\$ 600.00	\$ 1,500.00
2/16/2021	BHC	Discussed issues related to notice plan with co-counsel [.5].	0.5	\$ 600.00	\$ 300.00
2/27/2021	BHC	Exchanged emails with co-counsel regarding motion for reconsideration and case deadlines [.3].	0.3	\$ 600.00	\$ 180.00
3/1/2021	BHC	Worked on notice plan [.8].	0.8	\$ 600.00	\$ 480.00
3/2/2021	BHC	Read and analyzed order denying motion for reconsideration; discussed order, notice plan and case schedule with co-counsel [.8].	0.8	\$ 600.00	\$ 480.00
3/9/2021	BHC	Worked on motion to approve class notice and supporting documents [.8].	0.8	\$ 600.00	\$ 480.00
3/10/2021	BHC	Worked with staff and co-counsel on issues related to expert analysis for notice plan [.3].	0.3	\$ 600.00	\$ 180.00

Date	Timekeeper	Narrative	Units	Rate	Value
3/11/2021	BHC	Exchanged emails with co-counsel regarding contents of notice website [.2]. Worked on declaration regarding notice plan [.4]; telephone call with co-counsel regarding same [.2]. Worked on email response to defense counsel regarding Plaintiffs' proposed notice plan [.4]; telephone call with co-counsel regarding same [.3]. Exchanged emails with co-counsel regarding subpoena issues [.2].	1.7	\$ 600.00	\$ 1,020.00
3/12/2021	BHC	Worked on motion to approve notice plan and supporting documents [.6].	0.6	\$ 600.00	\$ 360.00
3/17/2021	BHC	Exchanged emails with co-counsel regarding case status and strategy [.2].	0.2	\$ 600.00	\$ 120.00
3/23/2021	BHC	Exchanged emails with co-counsel and staff regarding docketing [.1].	0.1	\$ 600.00	\$ 60.00
3/25/2021	BHC	Responded to defendant's request for Word versions of notice documents; discussed same with co-counsel [.2]. Reviewed data produced by Yodel in response to subpoena [.2].	0.4	\$ 600.00	\$ 240.00
3/29/2021	BHC	Discussed issues related to Little Brook Media subpoena response with co-counsel [.4].	0.4	\$ 600.00	\$ 240.00
3/30/2021	BHC	Video conference with co-counsel regarding class data and subpoena follow up [.5].	0.5	\$ 600.00	\$ 300.00
4/1/2021	BHC	Read Supreme Court's decision in Facebook [.6]; exchanged emails with co-counsel regarding same [.1].	0.7	\$ 600.00	\$ 420.00
4/1/2021	BHC	Worked on reply in support of motion for class certification.	3.7	\$ 600.00	\$ 2,220.00
4/2/2021	BHC	Meeting with co-counsel regarding Little Brook Media subpoena response; follow up call regarding same [.6]. Reviewed Little Brook Media documents for issues related to confidentiality and use in support of reply supporting class notice plan [.7]. Drafted motion to seal in support of reply supporting notice plan [1.2].	2.8	\$ 600.00	\$ 1,680.00
4/5/2021	BHC	Worked on reply in support of notice plan [.3].	0.3	\$ 600.00	\$ 180.00
4/5/2021	BHC	Worked on notice renoting motion to seal [.1]. Email to co-counsel regarding Little Brook Media response to motion to seal [.2].	0.3	\$ 600.00	\$ 180.00
4/6/2021	BHC	Read and analyzed court's order regarding class notice; strategized with co-counsel regarding same [.9].	0.9	\$ 600.00	\$ 540.00
4/7/2021	BHC	Exchanged emails with co-counsel regarding third party responses to subpoenas [.2].	0.2	\$ 600.00	\$ 120.00
4/9/2021	BHC	Analyzed Little Brook Media invoices to Prospects and compiled data on number of leads sold [.8]. Telephone call with co-counsel regarding class notice list [.2]. Exchanged emails with co-counsel regarding production issues related to subpoenas [.3].	1.3	\$ 600.00	\$ 780.00
4/21/2021	BHC	Video conference with co-counsel regarding lead data analysis [.6]. Worked on joint status report [.4].	1	\$ 600.00	\$ 600.00
4/23/2021	BHC	Discussed strategy for responding to PillPack revisions with co-counsel [.3]. Worked on joint status report revisions [.8].	1.1	\$ 600.00	\$ 660.00
4/26/2021	BHC	Reviewed PillPack's correspondence with third parties in preparation for writing meet and confer letter [.6].	0.6	\$ 600.00	\$ 360.00
4/27/2021	BHC	Meet and confer letter to PillPack regarding communications withheld on the basis of privilege [1.5].	1.5	\$ 600.00	\$ 900.00
4/28/2021	BHC	Video conference with co-counsel regarding data produced by Yodel [.9]; telephone call with co-counsel regarding same [.4]. Worked with staff to finalize letter to PillPack regarding withheld documents and approved sending of same [.3]. Reviewed rules regarding depositions by written question; memo to co-counsel regarding same [.2].	1.8	\$ 600.00	\$ 1,080.00
5/10/2021	BHC	Read Grant deposition in McCurley [.6]; discussed data analysis with co-counsel [1.2]. Exchanged emails with co-counsel regarding lead provider subpoenas; scheduled call regarding same [.1]. Telephone conference with co-counsel regarding third party subpoena follow up [.6]. Read and analyzed PillPack's response to request to confer on withheld documents; read cases cited by PillPack; memo to co-counsel regarding strategy for moving forward [.7].	3.2	\$ 600.00	\$ 1,920.00
5/11/2021	BHC	Worked with staff on Yodel motion to compel docket tracking [.1].	0.1	\$ 600.00	\$ 60.00
5/12/2021	BHC	Video conference with co-counsel regarding class notice, subpoena, and case management issues [1.2].	1.4	\$ 600.00	\$ 840.00
5/14/2021	BHC	Exchanged emails with co-counsel regarding status of subpoena responses [.2].	0.8	\$ 600.00	\$ 480.00
5/17/2021	BHC	Videoconference with co-counsel regarding class list issues [.8].	0.8	\$ 600.00	\$ 480.00
5/17/2021	BHC	Telephone call with co-counsel regarding data analysis and correspondence with counsel for Yodel and Prospects DM [.4]; email memo with further data analysis questions to co-counsel and staff [.6].	1	\$ 600.00	\$ 600.00
5/24/2021	BHC	Worked with co-counsel on matters related to joint status report, class data, and subpoenas [.5].	0.5	\$ 600.00	\$ 300.00

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5/25/2021	BHC	Worked on joint status report and related document production [.4]; discussed strategy with co-counsel [.4].	0.8	\$ 600.00	\$ 480.00
6/1/2021	BHC	Worked on joint status report [1.5]. Read Josh Grant deposition testimony to identify information about Prospects DM call systems [1.5].	3	\$ 600.00	\$ 1,800.00
6/2/2021	BHC	Read order in Yodel enforcement action [.2].	0.2	\$ 600.00	\$ 120.00
6/3/2021	BHC	Video conference with co-counsel regarding motion to compel Yodel subpoena response [.5]; worked on issues related to same [.2].	0.7	\$ 600.00	\$ 420.00
6/4/2021	BHC	Worked on list of questions to ask Josh Grant in potential future deposition [2.5]	2.5	\$ 600.00	\$ 1,500.00
6/9/2021	BHC	Reviewed emails and other case documents related to response to PillPack's motion to stay [.4].	0.4	\$ 600.00	\$ 240.00
6/10/2021	BHC	Drafted declaration of Mr. Kornvein [.6].	0.6	\$ 600.00	\$ 360.00
6/11/2021	BHC	Worked on response to PillPack's motion to stay [4.5]. Reviewed Kornvein declaration; email to staff regarding same [.2].	4.7	\$ 600.00	\$ 2,820.00
6/12/2021	BHC	Worked on response to motion to stay.	2	\$ 600.00	\$ 1,200.00
6/14/2021	BHC	Video conference with co-counsel regarding discovery matters [.7]. Worked on motion to stay response [1.2].	1.9	\$ 600.00	\$ 1,140.00
6/15/2021	BHC	Email to co-counsel regarding subpoena to Prospects DM [.4].	0.4	\$ 600.00	\$ 240.00
6/15/2021	BHC	Drafted email message to counsel for Prospects DM regarding subpoena response [.4].	0.4	\$ 600.00	\$ 240.00
7/12/2021	BHC	Worked on discovery responses [.8]; discussed case management strategy with co-counsel [.3].	1.1	\$ 600.00	\$ 660.00
8/2/2021	BHC	Worked on motion to approve notice plan [2.8]. Telephone call with co-counsel regarding notice plan [.4].	3.2	\$ 600.00	\$ 1,920.00
8/5/2021	BHC	Worked on revised notice plan.	0.4	\$ 600.00	\$ 240.00
8/6/2021	BHC	Worked on declaration in support of motion to approve notice plan [.2]. Reviewed final documents for filing [.4].	0.6	\$ 600.00	\$ 360.00
8/10/2021	BHC	Video conference with co-counsel regarding Yodel deposition strategy [.4].	0.4	\$ 600.00	\$ 240.00
8/11/2021	BHC	Exchanged emails with co-counsel regarding defense counsel request for notice list [.1].	0.1	\$ 600.00	\$ 60.00
8/12/2021	BHC	Worked on Yodel deposition outline; read documents related to same [4.5]. Drafted email message to counsel for Yodel regarding service of subpoena and request to confer regarding same [.4]; discussed Yodel deposition with Ms. Murry [.5].	5.4	\$ 600.00	\$ 3,240.00
8/13/2021	BHC	Worked on Yodel deposition outline [5.5].	5.5	\$ 600.00	\$ 3,300.00
8/16/2021	BHC	Worked on Yodel deposition outline.	2.8	\$ 600.00	\$ 1,680.00
8/17/2021	BHC	Worked on Yodel deposition outline [1.5]. Exchanged emails with co-counsel regarding meet and confer with Yodel [.1]. Read court's minute order on case schedule [.1]; exchanged emails with co-counsel regarding same [.1].	1.8	\$ 600.00	\$ 1,080.00
8/19/2021	BHC	Email to defense counsel regarding third-party subpoena notices [.2].	0.2	\$ 600.00	\$ 120.00
8/20/2021	BHC	Telephone call with co-counsel to discuss Yodel deposition outline and exhibits [1]. Read and analyzed PillPack's response to motion to approve notice plan [.8]. Telephone call with co-counsel regarding strategy for reply brief [.8]. Email to defense counsel regarding request for extension of time to reply [.2].	2.8	\$ 600.00	\$ 1,680.00
8/23/2021	BHC	Worked on stipulated motion to extend time to file reply [.2]. Telephone conference with co-counsel regarding strategy for amending class definition and notice issues [.5].	0.7	\$ 600.00	\$ 420.00
8/25/2021	BHC	Discussed scheduling and Yodel deposition with co-counsel [.3].	0.3	\$ 600.00	\$ 180.00
8/26/2021	BHC	Worked on Yodel deposition outline.	2	\$ 600.00	\$ 1,200.00
8/27/2021	BHC	Worked on Yodel deposition outline [3.2]. Worked on exhibits for Yodel deposition with staff and sent emails to all counsel regarding remote deposition exhibits and logistics [1.1]. Telephone call from co-counsel regarding discovery conference with PillPack and letter relating to same [.2].	4.5	\$ 600.00	\$ 2,700.00
8/30/2021	BHC	Read discovery correspondence and answers and objections on preparation for meet and confer with counsel for PillPack [.7]. Reviewed data excerpt exhibits [.9]. Video conference with co-counsel to prepare for meet and confer with PillPack [.7]. Meet and confer with counsel for PillPack [.5]. Follow up call with co-counsel regarding same [.3].	3.1	\$ 600.00	\$ 1,860.00

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8/31/2021	BHC	Reviewed prior transcripts of Mr. Wood's testimony [1.5]. Discussed case management and discovery with co-counsel [.6].	2.1	\$ 600.00	\$ 1,260.00
9/1/2021	BHC	Worked on Yodel depositions preparation [6.5].	6.5	\$ 600.00	\$ 3,900.00
9/2/2021	BHC	Prepared for Yodel deposition [.8]. Participated in Yodel deposition [6.5]; discussed Yodel deposition with co-counsel [.4].	7.7	\$ 600.00	\$ 4,620.00
9/3/2021	BHC	Discussed case management and strategy with co-counsel [.7]. Email listing additional data to pursue from Yodel [.2].	0.9	\$ 600.00	\$ 540.00
9/5/2021	BHC	Discussed strategy for revised class definition with co-counsel.	0.4	\$ 600.00	\$ 240.00
9/7/2021	BHC	Worked on Plaintiff's motion to modify class definition.	1	\$ 600.00	\$ 600.00
9/8/2021	BHC	Worked on reply in support of motion to approve class notice [.3]. Telephone call with co-counsel regarding motion to amend class definition [.2]. Worked on motion to modify class definition [1.2].	1.7	\$ 600.00	\$ 1,020.00
9/10/2021	BHC	Discussed discovery responses and proposed search terms with co-counsel; worked on case management issues [1.2].	1.2	\$ 600.00	\$ 720.00
9/15/2021	BHC	Email to Mr. Watkins regarding Yodel deposition [.3].	0.3	\$ 600.00	\$ 180.00
9/16/2021	BHC	Telephone conference with co-counsel regarding third-party discovery [.5]. Worked on issues related to subpoena topics [1.5].	2	\$ 600.00	\$ 1,200.00
9/17/2021	BHC	Worked on Yodel deposition preparation [.1]. Discussed Nexxa deposition with co-counsel [.2].	0.3	\$ 600.00	\$ 180.00
9/20/2021	BHC	Discussed issues related to Fluent deposition with co-counsel [.1]. Read Yodel deposition transcript in preparation for second deposition [3.2]. Video conference with co-counsel regarding preparation and management of upcoming depositions [.6]. Telephone calls to Mr. Hunt regarding deposition schedule [.2]; follow up email to Mr. Hunt providing amended deposition subpoena [.3].	4.4	\$ 600.00	\$ 2,640.00
9/21/2021	BHC	Worked on Yodel second deposition outline and preparation [2.5]. Worked on client device inspection protocol [.2]; discussed same with co-counsel [.2]. Reviewed and analyzed supplemental production from Yodel [1.1].	4	\$ 600.00	\$ 2,400.00
9/22/2021	BHC	Prepared for second Yodel deposition [.9]. Second deposition of Yodel [1]. Worked on questions related to call data with co-counsel in light of deposition testimony [.5]. Prepared materials for deposition of Tyler Hunt for co-counsel [.2].	2.6	\$ 600.00	\$ 1,560.00
9/23/2021	BHC	Videoconference with co-counsel regarding discovery matters [.5].	0.5	\$ 600.00	\$ 300.00
9/24/2021	BHC	Discussed Fluent deposition with co-counsel [.2].	0.2	\$ 600.00	\$ 120.00
9/26/2021	BHC	Worked on Tyler Hunt deposition outline [2.3].	2.3	\$ 600.00	\$ 1,380.00
9/27/2021	BHC	Worked on issues related to deposition scheduling and number of depositions taken by each side [.3]. Worked on Tyler Hunt deposition outline [.2].	0.5	\$ 600.00	\$ 300.00
9/28/2021	BHC	Discussed Fluent deposition strategy [.3]. Worked on issues related to Hunt deposition [.2]. Worked on outline for Fluent deposition [1.5]. Participated in Hunt deposition [4.8]. Worked on Fluent outline [.8].	7.6	\$ 600.00	\$ 4,560.00
9/29/2021	BHC	Prepared for Fluent deposition [.7]. Participated in Fluent deposition [6].	6.7	\$ 600.00	\$ 4,020.00
9/30/2021	BHC	Reviewed deposition exhibits and approved same [.1].	0.1	\$ 600.00	\$ 60.00
10/1/2021	BHC	Worked on Plaintiff's responses to PillPack's RFAs and third discovery requests [.8].	0.8	\$ 600.00	\$ 480.00
10/6/2021	BHC	Deposition of Josh Grant [5.2]; discussed same with co-counsel [.5].	5.7	\$ 600.00	\$ 3,420.00
10/8/2021	BHC	Worked on reply in support of motion to modify class definition [2.8].	2.8	\$ 600.00	\$ 1,680.00
10/12/2021	BHC	Discussed case schedule and expert work with co-counsel [.2].	0.2	\$ 600.00	\$ 120.00
10/14/2021	BHC	Exchanged emails with co-counsel regarding briefing schedule for motion to amend class definition [.2].	0.2	\$ 600.00	\$ 120.00
10/19/2021	BHC	Discussed expert work with co-counsel [.7].	0.7	\$ 600.00	\$ 420.00
10/26/2021	BHC	Read and analyzed PillPack's response to motion to modify class definition and discussed same with Ms. Murray [1.5]. Reviewed prior briefs and evidence related to reply supporting motion to modify class definition [.4].	1.9	\$ 600.00	\$ 1,140.00
10/26/2021	BHC	Read and analyzed briefs and evidence in preparation for work on reply in support of motion to modify class definition.	2.7	\$ 600.00	\$ 1,620.00

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10/27/2021	BHC	Read and analyzed Franz declaration in support of PillPack's response to motion to modify [1.8]. Worked on reply in support of motion to modify class definition [7].	8.8	\$ 600.00	\$ 5,280.00
10/28/2021	BHC	Worked on reply in support of motion to modify class definition [7].	7	\$ 600.00	\$ 4,200.00
11/3/2021	BHC	Read and analyzed court's order decertifying class [.6]; discussed same with co-counsel [.5]. Video conference with co-counsel regarding moving to certify narrowed class and related discovery matters [1.4].	1.1	\$ 600.00	\$ 660.00
11/9/2021	BHC	Worked on response to PillPack's proposed revised case schedule [.4].	1.4	\$ 600.00	\$ 840.00
11/10/2021	BHC	Telephone conference with co-counsel regarding meet and confer with counsel for PillPack and email regarding same [.5]. Video conference with counsel for PillPack regarding case schedule [.5]; follow up discussion with co-counsel regarding same [.5].	0.4	\$ 600.00	\$ 240.00
11/11/2021	BHC	Telephone conference with counsel for PillPack regarding case schedule [.4]. Discussed case strategy with co-counsel [1.3].	1.5	\$ 600.00	\$ 900.00
11/15/2021	BHC	Video conference with co-counsel regarding strategy for renewed motion for class certification [1.5].	1.7	\$ 600.00	\$ 1,020.00
11/16/2021	BHC	Reviewed proposed case schedule and responded to co-counsel emails regarding same [.1].	1.5	\$ 600.00	\$ 900.00
11/17/2021	BHC	Discussed meet and confer and strategy for call with client with co-counsel [.2].	0.1	\$ 600.00	\$ 60.00
11/19/2021	BHC	Telephone call with co-counsel and client regarding issues raised by PillPack regarding inspection [1]. Telephone conference with Vestige regarding client's device inspection [.6]; follow up call with co-counsel regarding same [.2]. Telephone message for Mr. Kelley regarding review of client data [.1]. Email to Mr. Franz regarding follow up on meet and confer [.1].	0.2	\$ 600.00	\$ 120.00
11/22/2021	BHC	Video conference with co-counsel regarding client device inspection and expert work [1.5]. Worked on draft email to client regarding supplemental report to Vestige [.2].	1	\$ 600.00	\$ 600.00
11/23/2021	BHC	Meeting with client regarding Vestige report [1]. Discussed responded to PillPack regarding device inspection with co-counsel [.6].	1.5	\$ 600.00	\$ 900.00
12/6/2021	BHC	Meeting with consulting expert regarding Vestige report [1]. Reviewed and edited correspondence to client and defense counsel regarding [REDACTED] [.2].	0.2	\$ 600.00	\$ 120.00
12/9/2021	BHC	Telephone call with co-counsel regarding client communications [1].	0.2	\$ 600.00	\$ 120.00
12/20/2021	BHC	Worked on issues related to records to provide to expert [.4]. Worked on expert report [.6].	1.6	\$ 600.00	\$ 960.00
12/21/2021	BHC	Approved agreement with client and Vestige regarding preservation of data [.2].	1.2	\$ 600.00	\$ 720.00
12/27/2021	BHC	Telephone conference with Ms. Murray regarding class certification brief outline [.3].	1	\$ 600.00	\$ 600.00
1/13/2022	BHC	Meetings with Ms. Murray regarding class certification strategy [.5]	0.4	\$ 600.00	\$ 240.00
1/14/2022	BHC	Discussed motion for class certification with Ms. Murray [.2]. Worked on motion for class certification [4.5].	0.6	\$ 600.00	\$ 360.00
2/2/2022	BHC	Worked on renewed motion for class certification; discussed same with Ms. Murray [1.8]. Reviewed call recording transcripts [.3]; telephone call with Ms. Murray regarding motion for class certification [.2]. Worked on motion for class certification [.8].	0.2	\$ 600.00	\$ 120.00
4/1/2022	BHC	Worked on motion to seal [.8]; reviewed all call transcripts for personally identifying information to redact [.8]. Revised and worked on motion for class certification and exhibits supporting same [3.8]. Telephone call with counsel for PillPack regarding confidentiality designations [.2].	0.3	\$ 600.00	\$ 180.00
4/13/2022	BHC	Email to Mr. Franz regarding redactions [.3]. Responded to email from Mr. Franz regarding confidentiality [.1].	0.5	\$ 600.00	\$ 300.00
4/18/2022	BHC	Read and analyzed PillPack's class certification response [.8]; strategy meeting with Ms. Murray regarding reply brief [1.5]. Analyzed Fluent testimony and exhibits in light of PillPack's arguments [.6].	4.7	\$ 600.00	\$ 2,820.00
4/20/2022	BHC	Worked on reply brief.	1.8	\$ 600.00	\$ 1,080.00
4/21/2022	BHC	Read and analyzed PillPack's motion for summary judgment [1]; discussed same with Ms. Murray [.5]; legal research regarding same [.5].	1.3	\$ 600.00	\$ 780.00
4/22/2022	BHC	Research related to response to motion for summary judgment [2.5].	5.6	\$ 600.00	\$ 3,360.00
5/5/2022	BHC		0.3	\$ 600.00	\$ 180.00
5/6/2022	BHC		0.1	\$ 600.00	\$ 60.00
5/27/2022	BHC		2.9	\$ 600.00	\$ 1,740.00
6/3/2022	BHC		1.4	\$ 600.00	\$ 840.00
6/27/2022	BHC		2	\$ 600.00	\$ 1,200.00
6/29/2022	BHC		2.5	\$ 600.00	\$ 1,500.00

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6/30/2022	BHC	Research related to response to PillPack's motion for summary judgment [4.9]. Discussed summary judgment response with Ms. Murray [2].	5.1	\$ 600.00	\$ 3,060.00
7/1/2022	BHC	Worked on response to PillPack's motion for summary judgment [7].	7	\$ 600.00	\$ 4,200.00
7/5/2022	BHC	Worked on response to motion for summary judgment [6.5].	6.5	\$ 600.00	\$ 3,900.00
7/6/2022	BHC	Read and analyzed Hunt transcript for work on response to motion for summary judgment [1.8].	1.8	\$ 600.00	\$ 1,080.00
7/6/2022	BHC	Worked on response to motion for summary judgment [4.5].	4.5	\$ 600.00	\$ 2,700.00
7/7/2022	BHC	Worked on response to PillPack's motion for summary judgment [3].	3	\$ 600.00	\$ 1,800.00
7/8/2022	BHC	Completed work on response to motion for summary judgment [2.4].	2.4	\$ 600.00	\$ 1,440.00
7/11/2022	BHC	Worked on response to motion for summary judgment [1.8].	1.8	\$ 600.00	\$ 1,080.00
7/11/2022	BHC	Worked on response to motion for summary judgment.	2.4	\$ 600.00	\$ 1,440.00
7/12/2022	BHC	Checked filed summary judgment response for accuracy [3].	0.3	\$ 600.00	\$ 180.00
12/5/2022	BHC	Read and analyzed order denying motion for summary judgment [5]; discussed same with co-counsel [5].	1	\$ 600.00	\$ 600.00
12/23/2022	BHC	Read and analyzed order granting class certification [8]; discussed issues related to same with co-counsel [5]. Telephone call with Ms. Nuss regarding data analysis for notice in light of certification order [5].	1.8	\$ 600.00	\$ 1,080.00
12/30/2022	BHC	Discussed case management with Ms. Murray [3].	0.3	\$ 600.00	\$ 180.00
1/4/2023	BHC	Reviewed data analysis from Ms. Nuss, exchanged emails with co-counsel regarding same [2].	0.2	\$ 600.00	\$ 120.00
1/9/2023	BHC	Reviewed updated notice documents from administrator [4].	0.4	\$ 600.00	\$ 240.00
1/10/2023	BHC	Prepared for meet and confer regarding notice plan and case schedule [4]; meet and confer [5]; email to all counsel confirming agreements and disputes discussed during same [6].	1.5	\$ 600.00	\$ 900.00
1/17/2023	BHC	Discussed PillPack's email regarding notice plan with Ms. Murray [2].	0.2	\$ 600.00	\$ 120.00
1/23/2023	BHC	Telephone conference with Epiq regarding questions raised by PillPack [5]. Research regarding notice issues raised by PillPack [4]. Drafted substantive memo response to notice plan issues and case schedule issues raised by PillPack [1.5]. Worked on proposed notices in response to revisions proposed by PillPack [1.1].	3.5	\$ 600.00	\$ 2,100.00
1/24/2023	BHC	Completed revisions to proposed class notices based on co-counsel feedback [5]; email response to Mr. Franz regarding notice issues [4]. Reviewed revised declaration from notice provider [3]; exchanged emails with co-counsel and Epiq regarding notice [2]. Follow up email to Mr. Franz regarding notice issues [1].	1.5	\$ 600.00	\$ 900.00
1/30/2023	BHC	Reviewed PillPack's proposal regarding case schedule [2]; discussed same with Ms. Murray [1]; email to co-counsel recommending approval of compromise schedule [1].	0.4	\$ 600.00	\$ 240.00
1/31/2023	BHC	Exchanged emails with notice administrator regarding motion to approve notice plan [1]. Worked on joint status report reflecting agreed case schedule; sent same to counsel for PillPack [1.5].	1.6	\$ 600.00	\$ 960.00
2/2/2023	BHC	Finalized notices to include with motion to approve notice plan [5]. Drafted email response to Mr. Franz regarding motion to approve notice plan [5]; incorporated revisions from co-counsel and sent same [1]. Drafted proposed order to include with stipulation regarding case schedule and sent same to defense counsel for approval [2]. Drafted declaration in support of motion to approve notice plan and text of facts related to conferral process for brief [2.5].	3.8	\$ 600.00	\$ 2,280.00
2/6/2023	BHC	Exchanged emails with co-counsel regarding court email requesting scheduling conference availability [2].	0.2	\$ 600.00	\$ 120.00
2/13/2023	BHC	Read and analyzed response to motion to approval class notice; strategized with co-counsel regarding reply brief.	0.8	\$ 600.00	\$ 480.00
2/14/2023	BHC	Telephone call with co-counsel regarding reply supporting notice plan [1].	0.1	\$ 600.00	\$ 60.00
2/15/2023	BHC	Worked on response to PillPack's notice plan [4.6].	4.6	\$ 600.00	\$ 2,760.00
3/20/2023	BHC	Read and analyzed notice plan order; discussed same with co-counsel [4]; exchanged emails with notice administrator regarding implementing notice plan [3].	0.7	\$ 600.00	\$ 420.00
3/24/2023	BHC	Exchanged emails with co-counsel regarding notice issues [2].	0.2	\$ 600.00	\$ 120.00
3/31/2023	BHC	Reviewed final notice documents from Epiq [5]; responded to email questions regarding notice plan from Epiq [4]; telephone conference with Epiq regarding same [1].	1	\$ 600.00	\$ 600.00

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4/3/2023	BHC	Drafted discovery request to PillPack and subpoena to Performance Media [.7].	0.7	\$ 600.00	\$ 420.00
4/4/2023	BHC	Worked with staff on finalizing discovery requests and subpoena [.3].	0.3	\$ 600.00	\$ 180.00
4/5/2023	BHC	Read and analyzed PillPack's letter regarding notice list [.8]; discussed same with Ms. Murray [.4]. Drafted stipulation to extend notice date and sent same to defense counsel [.8].	2	\$ 600.00	\$ 1,200.00
4/6/2023	BHC	Discussed class data issues with co-counsel [.4]. Email to Mr. Franz regarding class list [.3]. Drafted motion to extend deadline to send class notice [2.5].	3.2	\$ 600.00	\$ 1,920.00
4/11/2023	BHC	Worked on responses to questions from counsel for PillPack regarding notice [.9]. Drafted subpoena request and cover letter to wireless carriers [1.5].	2.4	\$ 600.00	\$ 1,440.00
4/12/2023	BHC	Worked on issues related to subpoenas from wireless carriers [.2].	0.2	\$ 600.00	\$ 120.00
4/13/2023	BHC	Read and analyzed PillPack's response to Plaintiff's motion to extend date to send class notice [.3]. Commenced drafting reply in support of motion to extend deadline to send class notice [3.5]. Revised draft wireless carrier subpoenas and sent same to all counsel with memo regarding question to resolve [.2]; exchanged messages related to same [.2]. Worked on discovery request to PillPack regarding class member information [.2].	4.4	\$ 600.00	\$ 2,640.00
4/14/2023	BHC	Completed and revised reply in support of motion to extend notice deadline [2.5]; approved same for filing [.3]. Meet and confer with Mr. Dorf regarding subpoena [.5]; follow up call with Ms. Nuss regarding same [.2]; discussed same with Ms. Murray [.1].	3.6	\$ 600.00	\$ 2,160.00
4/17/2023	BHC	Worked with staff on subpoenas to wireless carriers [.3].	0.3	\$ 600.00	\$ 180.00
4/18/2023	BHC	Reviewed subpoenas to wireless carriers and approved issuing same [1.5].	1.5	\$ 600.00	\$ 900.00
4/20/2023	BHC	Read and analyzed order on motion to extend class notice date and trial scheduling order [.2]; resolved docketing questions related to same [.2]. Worked on email to Commnet regarding subpoena response [.1]. Forwarded West Central Wireless subpoena response to staff to process [.1].	0.6	\$ 600.00	\$ 360.00
4/21/2023	BHC	Responded to email from various wireless carriers regarding subpoenas for subscriber information [.7].	0.7	\$ 600.00	\$ 420.00
4/24/2023	BHC	Telephone call with Ms. Phillips at AT&T regarding subpoena response [.1]; follow up email regarding same [.1].	0.2	\$ 600.00	\$ 120.00
4/25/2023	BHC	Meeting with Mr. Moloney regarding subpoena to Lumen [.4]; follow up email confirming same [.2]. Forwarded response from Inland Cellular to staff [.1].	0.7	\$ 600.00	\$ 420.00
4/26/2023	BHC	Drafted response to message from Mr. Franz regarding subpoenas to wireless carriers and confidentiality [.7]. Exchanged emails and telephone call with wireless carriers regarding subpoenas [.2].	0.9	\$ 600.00	\$ 540.00
4/27/2023	BHC	Responded to emails and telephone calls from wireless carriers regarding subpoena responses [.3].	0.3	\$ 600.00	\$ 180.00
4/28/2023	BHC	Meet and confer with counsel for PillPack regarding confidentiality and wireless carrier subpoenas [.4]; prepared for same [.6].	1	\$ 600.00	\$ 600.00
5/8/2023	BHC	Video conference with counsel for T-Mobile regarding subpoena [.2]; follow up email documenting same [.3]. Emails to staff regarding payments and other administrative management of subpoenas [.3].	0.8	\$ 600.00	\$ 480.00
5/10/2023	BHC	Exchanged emails with Ms. Lee regarding subpoena to T-Mobile [.1].	0.1	\$ 600.00	\$ 60.00
5/11/2023	BHC	Email message to defense counsel regarding subpoenas and call record confidentiality [.2].	0.2	\$ 600.00	\$ 120.00
5/12/2023	BHC	Legal research regarding statutes cited by T-Mobile in objection to subpoena [.4]. Meet and confer with Ms. Lee regarding T-Mobile subpoena [.2]. Further research relating to objections [.9]. Emails to Ms. Lee regarding confirming message about conference [.4]. Email to Tami regarding Verizon objections to subpoena [.4].	2.3	\$ 600.00	\$ 1,380.00
5/13/2023	BHC	Legal research regarding California, Delaware, and Pennsylvania consumer privacy statutes in preparation for motions to compel subpoena responses [.9].	0.9	\$ 600.00	\$ 540.00
5/15/2023	BHC	Worked on motion to enforce subpoenas regarding California, Delaware, and Pennsylvania subscribers [3.5].	3.5	\$ 600.00	\$ 2,100.00
5/16/2023	BHC	Worked on motion to enforce Verizon subpoena and supporting declaration [2.8]. Worked on motion to enforce T-Mobile subpoena and supporting declaration [1].	3.8	\$ 600.00	\$ 2,280.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/18/2023	BHC	Worked on issues related to subpoena enforcement actions with co-counsel [.6]. Exchanged emails with Ms. Lee regarding meet and confer about T-Mobile subpoena enforcement [.1].	0.6	\$ 600.00	\$ 360.00
5/22/2023	BHC	Worked with staff on issues related to subpoena to Nemont [.1].	0.2	\$ 600.00	\$ 120.00
5/23/2023	BHC	Meeting with Ms. Lee regarding subpoena to T-Mobile; follow up email regarding same. Worked on revised unopposed order and motion to enforce T-Mobile subpoena [.4]. Telephone call to clerk's office regarding motion to enforce T-Mobile subpoena [.2]. Email to counsel for T-Mobile regarding accepted edits to proposed agreed order [.1]. Email to Ms. Lee providing re-filed unopposed motion to enforce [.1].	0.3	\$ 600.00	\$ 180.00
5/25/2023	BHC	Worked on revised unopposed order and motion to enforce T-Mobile subpoena [.4]. Telephone call to clerk's office regarding motion to enforce T-Mobile subpoena [.2]. Email to counsel for T-Mobile regarding accepted edits to proposed agreed order [.1]. Email to Ms. Lee providing re-filed unopposed motion to enforce [.1].	0.8	\$ 600.00	\$ 480.00
5/26/2023	BHC	Email to counsel for Lumen regarding completed subpoena response [.1]. Personal meeting with Ms. Murray regarding PillPack production [.2]. Reviewed subpoena enforcement action against Verizon [.2].	0.1	\$ 600.00	\$ 60.00
6/6/2023	BHC	Email to counsel for PillPack regarding whether data production is complete [.2].	0.4	\$ 600.00	\$ 240.00
6/7/2023	BHC	Worked on tracking subpoenas issued by PillPack [.4]. Worked on tracking of subpoenas to wireless carriers [.3].	0.2	\$ 600.00	\$ 120.00
6/23/2023	BHC	Email to counsel for PillPack regarding proposed extension of case schedule [.3]. Email to counsel for Verizon regarding acceptance of service [.1]. Email to counsel for AT&T regarding schedule for producing documents [.1].	0.7	\$ 600.00	\$ 420.00
6/26/2023	BHC	Worked on motion to extend deadline to send class notice.	0.5	\$ 600.00	\$ 300.00
6/26/2023	BHC	Email to Ms. Lee regarding Court order on T-Mobile subpoena compliance [.1]. Email to counsel for PillPack regarding proposed joint motion to extend time to mail class notice [.1]; incorporated PillPack's revisions into motion to extend and approved same for filing [.3].	0.1	\$ 600.00	\$ 60.00
6/28/2023	BHC	Drafted email memo to Mr. Franz regarding subpoena responses and class notice list [1.1]; sent same to co-counsel for comment [.1]; sent same to Mr. Franz [.1]. Drafted declaration regarding proof of service to be filed in Verizon subpoena enforcement action [.5].	0.5	\$ 600.00	\$ 300.00
6/29/2023	BHC	Email and telephone call with Ms. Brown regarding research into lead generators subpoenaed by PillPack [.5].	1.8	\$ 600.00	\$ 1,080.00
6/30/2023	BHC	Email to administrator regarding notice deadline [.2]. Left message for Orb, LLC employee who called regarding subpoena issued by PillPack [.1]. Email to Ms. Lee regarding T-Mobile subpoena compliance [.1].	0.5	\$ 600.00	\$ 300.00
7/11/2023	BHC	Worked with staff on PillPack subpoenas and tracking [.5]. Scheduled call with Epiq regarding class notice [.2].	0.4	\$ 600.00	\$ 240.00
7/12/2023	BHC	Video conference with notice administrator regarding data and case schedule [.4].	0.7	\$ 600.00	\$ 420.00
7/13/2023	BHC	Reviewed order compelling Verizon compliance with subpoena [.1]; sent same to Verizon [.2]; sent same to defense counsel [.1].	0.4	\$ 600.00	\$ 240.00
7/20/2023	BHC	Worked with staff on processing carrier subpoena response information [.2]. Exchanged emails with Verizon, Epiq, and staff regarding Verizon subpoena response [.4]. Reviewed and analyzed Mr. Franz's email regarding PillPack's refusal to produce class member names and contact information in light of prior representations to Court; discussed same with Ms. Murray [.6].	0.4	\$ 600.00	\$ 240.00
7/21/2023	BHC	Substantive email memo to Mr. Franz regarding class notice list [.8].	1.2	\$ 600.00	\$ 720.00
7/25/2023	BHC	Telephone call with Epiq regarding notice schedule and data management [.2]. Telephone call with Ms. Nuss regarding carrier data analysis and notice [.5]; follow up call regarding T-Mobile data [.1]. Telephone call to Ms. Lee regarding T-Mobile data [.1]. Rescheduled meet and confer with defense counsel [.1].	0.8	\$ 600.00	\$ 480.00
7/26/2023	BHC	Prepared for meet and confer with PillPack regarding withholding of class member names and contact information [.7]. Meet and confer with counsel for PillPack [.5].	1	\$ 600.00	\$ 600.00
7/27/2023	BHC	Drafted stipulated motion to extend class notice date.	1.2	\$ 600.00	\$ 720.00
7/28/2023	BHC	Legal research regarding response to PillPack on request for communications with Epiq [.6]; commenced drafting letter to counsel for PillPack regarding same [1.5]; completed letter to counsel for PillPack regarding same [1].	5.9	\$ 600.00	\$ 3,540.00
7/31/2023	BHC		3.1	\$ 600.00	\$ 1,860.00

Date	Timekeeper	Narrative	Units	Rate	Value
8/1/2023	BHC	Revised letter to PillPack regarding request for communications with Epiq and sent same to staff to finalize [4]. Provided order extending class notice date to Epiq [1]. Worked on class notice data workflow in preparation for call with administrator [1.5].	2	\$ 600.00	\$ 1,200.00
8/2/2023	BHC	Prepared for meeting with notice administrator regarding matching data for notice purposes [3]. Reviewed Court's order on class notice in preparation for meeting with notice provider [2]. Video conference with Epiq regarding data filtering and matching for notice purposes [7]; follow up discussion with Ms. Murray regarding same [2]. Email to Epiq providing Pennsylvania notice form [1]. Exchanged emails with Ms. Nuss regarding AT&T production [3]. Worked on docketing issue related to re-issued trial schedule [1].	1.9	\$ 600.00	\$ 1,140.00
8/4/2023	BHC	Email requesting PillPack's position on production of class data [2].	0.2	\$ 600.00	\$ 120.00
8/4/2023	BHC	Discussed data for notice with Ms. Nuss [4].	0.4	\$ 600.00	\$ 240.00
8/11/2023	BHC	Email to counsel for PillPack regarding outstanding request for class member contact information [1].	0.1	\$ 600.00	\$ 60.00
8/14/2023	BHC	Reviewed formatted notice postcards from administrator; left voice message for Ms. Lacount regarding same [2]. Telephone call from settlement administrator; follow up email regarding same [1]. Drafted email message to counsel for PillPack regarding non-response on issues related to class data [4]. Reviewed email from counsel for PillPack regarding refusal to provide class data; legal research related to same [6].	0.3	\$ 600.00	\$ 180.00
8/16/2023	BHC	Legal research related to PillPack's refusal to provide class member contact information [1.8].	1	\$ 600.00	\$ 600.00
8/17/2023	BHC	Legal research related to PillPack's refusal to provide class member contact information [1.8].	1.8	\$ 600.00	\$ 1,080.00
8/18/2023	BHC	Discussed Mr. Payson's email regarding withholding of class member contact information with Ms. Murray; responded to same [3]. Legal research related to PillPack's refusal to provide class member information [1.5]. Commenced drafting brief addressing PillPack's refusal to provide class member information [1.5].	3.3	\$ 600.00	\$ 1,980.00
8/21/2023	BHC	Read email from Mr. Payson regarding briefing on withheld class data [1]; email to Ms. Murray regarding same [1]; responded to Mr. Payson's email [1].	0.3	\$ 600.00	\$ 180.00
8/22/2023	BHC	Worked on motion to compel--drafted argument on waiver [2.1]; drafted argument on medical record privacy [4.2].	6.3	\$ 600.00	\$ 3,780.00
8/23/2023	BHC	Completed first draft of motion to compel [3.5]. Worked on proposed order and declaration supporting motion to compel; worked with staff on exhibits [2.8]. Revised motion to compel [1.5]; reviewed and approved all documents for filing [4].	8.2	\$ 600.00	\$ 4,920.00
8/24/2023	BHC	Email to Ms. Rainwater regarding agreement to log or produce communications with Epiq [3].	0.3	\$ 600.00	\$ 180.00
8/28/2023	BHC	Gathered email communications with Epiq Global for review and potential production to PillPack [8].	0.8	\$ 600.00	\$ 480.00
8/29/2023	BHC	Left voice message for Ms. La Count checking on status of notice preparation [1]. Telephone call from Mr. Meyer regarding opt-outs via email [1]. Worked with staff on review of Epiq communications for production [2].	0.4	\$ 600.00	\$ 240.00
9/1/2023	BHC	Reviewed class notices.	1.5	\$ 600.00	\$ 900.00
9/5/2023	BHC	Read and analyzed PillPack's response to motion to compel and cross motion for protective order [5]; legal research related to same [1.2].	1.7	\$ 600.00	\$ 1,020.00
9/6/2023	BHC	Read and analyzed Uribe declaration in support of motion to compel [2]. Legal research related to reply supporting motion to compel [3]; response to Legal research regarding response to PillPack's motion for protective order [9].	1.4	\$ 600.00	\$ 840.00
9/6/2023	BHC	Analyzed PillPack data relating to class notice [6].	0.6	\$ 600.00	\$ 360.00
9/7/2023	BHC	Legal research regarding response to motion to compel class member information [1.5]. Commenced drafting reply in support of motion to compel [1.5]; continued drafting reply in support of motion to compel [3.1]; completed draft of motion to compel reply [8].	6.9	\$ 600.00	\$ 4,140.00
9/8/2023	BHC	Drafted corrected proposed order [1]; exchanged emails with co-counsel regarding filing motion to compel reply [1].	0.2	\$ 600.00	\$ 120.00
9/11/2023	BHC	Commenced drafting response to PillPack's motion for protective order [2.2].	2.2	\$ 600.00	\$ 1,320.00

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9/12/2023	BHC	Revised response to motion for protective order [.3]; final review of PillPack's response to and cross motion to ensure all arguments addressed [.4]. Revised IVR script and sent same to administrator [.7].	1.4	\$ 600.00	\$ 840.00
9/13/2023	BHC	Drafted proposed order denying motion for protective order [.4]. Final review of response to motion for protective order and declaration [.4]. Telephone calls and messages with class administrator [.2].	1	\$ 600.00	\$ 600.00
9/14/2023	BHC	Exchanged email with co-counsel regarding court proposed hearing date on motion to compel; email to court confirming availability for same [.1]. Reviewed notice website; sent revisions to administrator [.6].	0.7	\$ 600.00	\$ 420.00
9/20/2023	BHC	Worked on review of documents for production [.2] Telephone call with notice administrator [.1].	0.3	\$ 600.00	\$ 180.00
9/21/2023	BHC	Privilege and responsiveness review of communications with Epiq for production [5.4].	5.4	\$ 600.00	\$ 3,240.00
9/25/2023	BHC	Further review of communications with Epiq for production [2.5].	2.5	\$ 600.00	\$ 1,500.00
9/28/2023	BHC	Exchanged emails with Ms. Nuss regarding Epiq document production and privilege log [.2]. Scheduled motion to compel argument moot with co-counsel [.2].	0.4	\$ 600.00	\$ 240.00
9/29/2023	BHC	Worked on privilege log associated with production of Epiq documents [1.9].	1.9	\$ 600.00	\$ 1,140.00
9/29/2023	BHC	Worked on privilege log regarding Epiq production.	0.4	\$ 600.00	\$ 240.00
10/3/2023	BHC	Worked with co-counsel on issues related to notice administration [.4]; telephone call related to same [.2].	0.6	\$ 600.00	\$ 360.00
10/4/2023	BHC	Prepared for hearing on motion to compel. [7.5].	7.5	\$ 600.00	\$ 4,500.00
10/5/2023	BHC	Prepared for argument on motion to compel [.7]. Argument on motion to compel [1]. Discussed court ruling with co-counsel and strategized regarding response to same; research related to potential motion for reconsideration [2.5]. Email to defense counsel regarding meet and confer about notice [.3]. Researched notice provided in Angulo case [.4]. Worked on privilege log regarding communications with Epiq [.5]. Video conference with Epiq regarding notice program [.4].	5.8	\$ 600.00	\$ 3,480.00
10/9/2023	BHC	Discussed case management with co-counsel [.2]. Reviewed privilege log and approved same for service [.2].	0.4	\$ 600.00	\$ 240.00
10/10/2023	BHC	Prepared for meet and confer with PillPack [.3]; meet and confer with PillPack [.5]. Email to counsel for PillPack regarding production of documents responsive to subpoenas [.2].	1	\$ 600.00	\$ 600.00
10/11/2023	BHC	Email to defense counsel regarding document production [.5].	0.5	\$ 600.00	\$ 300.00
10/13/2023	BHC	Drafted proposed notice to consumers identified in PillPack's data [.5]; email to counsel for PillPack regarding proposed notice [.3]; follow up email regarding request for identification of agreements purportedly requiring notice [.1].	0.9	\$ 600.00	\$ 540.00
10/15/2023	BHC	Commenced drafted motion for reconsideration [.4].	0.4	\$ 600.00	\$ 240.00
10/19/2023	BHC	Completed motion for reconsideration and documents supporting same [4.5]; reviewed final versions of same and approved for filing [.4].	4.9	\$ 600.00	\$ 2,940.00
11/14/2023	BHC	Exchanged emails with co-counsel regarding opt-outs declaration; reviewed declaration [.2]	0.2	\$ 600.00	\$ 120.00
11/17/2023	BHC	Worked with staff on deposition notices [.1].	0.1	\$ 600.00	\$ 60.00
12/7/2023	BHC	Worked on case management and strategy [.5]; reviewed documents produced after first Rule 30(b)(6) deposition to determine whether second deposition warranted [.6].	1.1	\$ 600.00	\$ 660.00
12/7/2023	BHC	Drafted requests for admission.	1.1	\$ 600.00	\$ 660.00
12/8/2023	BHC	Worked on Requests for admission and deposition notices; reviewed and approved same for service [.9].	1.2	\$ 600.00	\$ 720.00
12/18/2023	BHC	Telephone call with co-counsel regarding discovery and case management [.3].	0.1	\$ 600.00	\$ 60.00
12/26/2023	BHC	Exchanged emails with Ms. McEntee regarding reply supporting motion for reconsideration [.1]. Further analysis of depositions taken; responded to email from Mr. Franz regarding number of depositions per party [.5].	0.5	\$ 600.00	\$ 300.00
12/27/2023	BHC	Drafted reply in support of motion for reconsideration [2.2]; reviewed and approved same for filing [.2].	2.5	\$ 600.00	\$ 1,500.00
1/4/2024	BHC	Discussed case management with Ms. Murray [.1].	0.2	\$ 600.00	\$ 120.00
1/9/2024	BHC	Read and analyzed court's order granting motion for reconsideration [.2].	0.2	\$ 600.00	\$ 120.00
1/11/2024	BHC	Scheduled case management discussion with co-counsel [.2].	0.2	\$ 600.00	\$ 120.00
1/11/2024	BHC	Exchanged emails with staff and co-counsel regarding data analysis in advance of expert disclosure date [.2].	0.2	\$ 600.00	\$ 120.00

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1/12/2024	BHC	Email to Mr. Franz regarding number of depositions per side [2]. Reviewed documents responsive to PillPack subpoenas and updated tracker with results from same [5]. Revised topics for Rule 30(b)(6) notice to Performance Media [3].	5.5	\$ 600.00	\$ 3,300.00
1/16/2024	BHC	Drafted letter to counsel for PillPack regarding third party subpoena responses [1.9]; revised same and sent to all co-counsel [1].	2	\$ 600.00	\$ 1,200.00
1/17/2024	BHC	Final review of meet and confer letter regarding third-party subpoena productions [4].	0.4	\$ 600.00	\$ 240.00
1/25/2024	BHC	Exchanged emails with co-counsel regarding supplementing production of Epiq communications [4].	0.4	\$ 600.00	\$ 240.00
1/26/2024	BHC	Exchanged emails with co-counsel regarding agreement with Epiq; reviewed same for attorney client privilege or work product, directed production [4]. Email to counsel for PillPack regarding producing agreement with Epiq and Plaintiff's outstanding requests [2].	0.6	\$ 600.00	\$ 360.00
1/30/2024	BHC	Reviewed outstanding discovery issues and rules relating to clarifying RFA responses [2].	0.2	\$ 600.00	\$ 120.00
2/6/2024	BHC	Personal meeting with co-counsel on issues relating to class list and deposition scheduling [4]. Email to Mr. Franz regarding request for production of Epiq communications without redaction; reviewed privilege logs in preparation for same [6]. Telephone message for Ms. LaCount regarding PillPack request for Epiq data file [1].	1.1	\$ 600.00	\$ 660.00
2/7/2024	BHC	Email to Mr. Franz regarding Plaintiff's notice of second Rule 30(b)(6) deposition [6]. Worked on outline of Alex Uribe deposition [2.5].	3.1	\$ 600.00	\$ 1,860.00
2/8/2024	BHC	Exchanged emails with co-counsel regarding Dorf deposition and case management [3]. Worked with notice administrator on providing files requested by PillPack [3]. Lengthy email to PillPack's counsel regarding sending supplemental notice [1.4]. Email to Ms. Mitterdorfer regarding request form supplemental file from Epiq [2].	2.2	\$ 600.00	\$ 1,320.00
2/9/2024	BHC	Video conference with co-counsel regarding case management [1]. Personal meeting with Ms. Murray regarding goals for Dorf deposition [7]. Email to Ms. Rainwater regarding supplemental notice [5].	2.2	\$ 600.00	\$ 1,320.00
2/14/2024	BHC	Email to counsel for PillPack regarding questions about data production [4]. Worked with staff on second round of wireless carrier subpoenas [4]. Exchanged multiple communications with counsel for PillPack regarding supplemental notice proposal; drafted stipulation on supplemental notice [1.3].	2.1	\$ 600.00	\$ 1,260.00
2/15/2024	BHC	Reviewed and approved subpoenas for supplemental class data [2].	0.2	\$ 600.00	\$ 120.00
2/19/2024	BHC	Worked on stipulation regarding supplemental class notice [2]. Email to co-counsel regarding contents of expert report [3].	0.5	\$ 600.00	\$ 300.00
2/20/2024	BHC	Reviewed email from Mr. Payson confirming sign off on stipulation regarding supplemental notice; reviewed and approved same for filing [4].	0.4	\$ 600.00	\$ 240.00
2/21/2024	BHC	Discussed case management with Ms. Murray [1]. Worked on amended notice of Uribe deposition [1].	0.2	\$ 600.00	\$ 120.00
2/22/2024	BHC	Worked with staff on amended Uribe deposition notice [1]. Worked on issues related to expert report [3].	0.4	\$ 600.00	\$ 240.00
2/23/2024	BHC	Prepared for meeting with Mr. Hansen [3]. Videoconference with Mr. Hansen [5]. Worked on Hansen supplemental expert report [2.5]. Discussed case management and strategy with Ms. Murray [4].	3.7	\$ 600.00	\$ 2,220.00
2/24/2024	BHC	Videoconference with Mr. Hansen and Ms. Nuss [2.2]; worked on Mr. Hansen's report [2].	4.2	\$ 600.00	\$ 2,520.00
2/25/2024	BHC	Completed work on expert report and sent same to Mr. Hansen [6].	0.6	\$ 600.00	\$ 360.00
2/26/2024	BHC	Worked on Mark Dorf Deposition outline [4.4]. Completed work on expert report with Ms. Murray [5].	4.9	\$ 600.00	\$ 2,940.00
2/27/2024	BHC	Completed Mark Dorf deposition outline [3.8]. Discussed Dorf outline with co-counsel [6].	4.4	\$ 600.00	\$ 2,640.00
2/28/2024	BHC	Prepared for meet and confer regarding Epiq communications redactions [2.5]. Video conference with counsel for PillPack regarding potential mediation [3]; discussed same with co-counsel [8]. Research regarding potential mediators [5].	4.1	\$ 600.00	\$ 2,460.00
2/29/2024	BHC	Exchanged further communications with co-counsel regarding potential mediators [2]. Email to counsel for PillPack regarding potential mediators [3].	0.5	\$ 600.00	\$ 300.00
3/1/2024	BHC	Email to defense counsel providing referrals for potential mediators [2].	0.2	\$ 600.00	\$ 120.00

Date	Timekeeper	Narrative	Units	Rate	Value
3/6/2024	BHC	Exchanged emails with staff regarding Verizon data production [.1]; telephone call to Epiq regarding same [1]. Email to potential mediator's assistant regarding scheduling [1].	0.3	\$ 600.00	\$ 180.00
3/12/2024	BHC	Worked with Ms. Nuss on accessing AT&T subpoena production [1].	0.1	\$ 600.00	\$ 60.00
3/13/2024	BHC	Exchanged emails with defense counsel regarding scheduling mediation [3]. Coordinated with Ms. Rainwater regarding call to court on requested stay [2]; reviewed order regarding same [1].	0.6	\$ 600.00	\$ 360.00
3/14/2024	BHC	Exchanged emails with defense counsel and potential mediator assistant regarding scheduling [5].	0.5	\$ 600.00	\$ 300.00
3/19/2024	BHC	Exchanged telephone calls and emails with all counsel, mediator staff and co-counsel regarding potential mediation dates [4].	0.4	\$ 600.00	\$ 240.00
3/20/2024	BHC	Exchanged emails with defense counsel regarding mediation scheduling [2]. Reviewed scheduling information from Judge Welsh [2].	0.4	\$ 600.00	\$ 240.00
3/25/2024	BHC	Email to all counsel regarding mediation scheduling logistics [1].	0.1	\$ 600.00	\$ 60.00
4/2/2024	BHC	Reviewed mediation invoice and scheduling; approved invoice for payment [2].	0.2	\$ 600.00	\$ 120.00
4/12/2024	BHC	Email to Ms. Nuss regarding AT&T production email [1].	0.1	\$ 600.00	\$ 60.00
5/8/2024	BHC	Coordinated with co-counsel on scheduling pre-mediation call per mediator request [2].	0.2	\$ 600.00	\$ 120.00
5/9/2024	BHC	Worked on mediation logistics [5].	0.5	\$ 600.00	\$ 300.00
5/20/2024	BHC	Worked on mediation letter [2].	2	\$ 600.00	\$ 1,200.00
5/22/2024	BHC	Read and analyzed PillPack's expert report in preparation for mediation [2.8]. Worked on mediation submission [1.5].	4.3	\$ 600.00	\$ 2,580.00
5/23/2024	BHC	Premediation call with mediator [4]. Worked on mediation submission [4]. Worked with co-counsel on scheduling mediation preparation session with client [1].	4.5	\$ 600.00	\$ 2,700.00
5/24/2024	BHC	Worked on mediation submission [3.4]; sent same to co-counsel [1]. Discussed mediation numbers and strategy with co-counsel [1.2].	4.7	\$ 600.00	\$ 2,820.00
5/25/2024	BHC	Worked on draft settlement agreement [8].	0.8	\$ 600.00	\$ 480.00
5/26/2024	BHC	Completed draft of settlement agreement [1.5].	1.5	\$ 600.00	\$ 900.00
5/28/2024	BHC	Email to Ms. Terrell regarding mediation submission [1]; revised mediation submission in response to comments from co-counsel [2]; worked with staff on finalizing mediation submission exhibits [6]. Completed mediation submission with exhibit sites; approved same for service on mediator [7].	1.6	\$ 600.00	\$ 960.00
5/29/2024	BHC	Served Plaintiff's mediation submission on all counsel and uploaded to mediator system [3]. Email to mediation service regarding attendees and logistics [2]. Read and analyzed PillPack's mediation submission; follow up data analysis with team [2.5]. Email to client regarding mediation prep session [2].	3.2	\$ 600.00	\$ 1,920.00
5/30/2024	BHC	Worked on mediation numbers based on information from co-counsel [4]. Prepared for client meeting on mediation [2]. Videoconference with client to prepare for mediation and get settlement authority [6].	1.2	\$ 600.00	\$ 720.00
5/31/2024	BHC	Discussed mediation comps chart with Ms. Murray [1].	0.1	\$ 600.00	\$ 60.00
6/3/2024	BHC	Assembled materials to take to mediation [3].	0.3	\$ 600.00	\$ 180.00
6/5/2024	BHC	Met with co-counsel in advance of mediation [3]. Mediation [5.5]. Travel from mediation [4].	9.8	\$ 600.00	\$ 5,880.00
6/10/2024	BHC	Email to client and co-counsel regarding extension of time for PillPack's response to mediator's proposal [2].	0.2	\$ 600.00	\$ 120.00
6/11/2024	BHC	Reviewed stipulation to extend stay; discussed with co-counsel and approved same for filing [2].	0.2	\$ 600.00	\$ 120.00
6/18/2024	BHC	Legal research related to motion for preliminary approval [3.5].	3.5	\$ 600.00	\$ 2,100.00
6/20/2024	BHC	Revised settlement agreement [3]; sent same to all counsel [1]. Worked on motion for preliminary approval [2.5].	2.9	\$ 600.00	\$ 1,740.00
6/21/2024	BHC	Completed draft of motion for preliminary approval [2.5]	2.5	\$ 600.00	\$ 1,500.00
7/11/2024	BHC	Worked on data questions from PillPack [4]. Reviewed PillPack edits to settlement agreement; discussed same with co-counsel and scheduled call with defense counsel to resolve same [6].	1	\$ 600.00	\$ 600.00
7/12/2024	BHC	Confirmed settlement call to discuss settlement agreement terms with Ms. Rainwater [1]. Videoconference with defense counsel regarding settlement agreement terms [4]. Worked on settlement notices [1.5].	2	\$ 600.00	\$ 1,200.00
7/16/2024	BHC	Worked on class notices [3.5].	3.5	\$ 600.00	\$ 2,100.00

Date	Timekeeper	Narrative	Units	Rate	Value
7/17/2024	BHC	Worked with co-counsel on settlement administration issues [.1].	0.1	\$ 600.00	\$ 60.00
7/18/2024	BHC	Emails to Mr. Franz regarding settlement class data questions [.2].	0.2	\$ 600.00	\$ 120.00
7/19/2024	BHC	Worked on class notices and proposed order exhibits to settlement agreement; sent same to all counsel [.2].	1.2	\$ 600.00	\$ 720.00
7/29/2024	BHC	Worked with co-counsel on response to PillPack proposed revision to settlement agreement; returned same to defense counsel [.4].	0.4	\$ 600.00	\$ 240.00
8/1/2024	BHC	Worked with co-counsel on issues related to attorneys' fee request in preliminary approval motion [.2].	0.2	\$ 600.00	\$ 120.00
8/2/2024	BHC	Analyzed settlement administrator bid and sent email to co-counsel regarding line items that appear too high [.4].	0.4	\$ 600.00	\$ 240.00
8/5/2024	BHC	Exchanged emails with Ms. Rainwater regarding settlement agreement and motion for preliminary approval [.1]. Drafted claim form [.4].	0.5	\$ 600.00	\$ 300.00
8/6/2024	BHC	Worked on motion for preliminary approval [.3]; sent same to co-counsel [.1].	0.4	\$ 600.00	\$ 240.00
8/8/2024	BHC	Incorporated preliminary approval motion revisions from co-counsel and sent draft motion to defense counsel for review [.6]. Worked with staff on declaration supporting same [.1].	0.7	\$ 600.00	\$ 420.00
8/13/2024	BHC	Drafted stipulation to extend time for filing preliminary approval [.5]. Responded to PillPack proposed edits to settlement agreement exhibits [2.1]. Email correspondence with defense counsel regarding edits to notices, motion for preliminary approval, and proposed stipulation [.3].	2.9	\$ 600.00	\$ 1,740.00
8/16/2024	BHC	Discussed settlement administration bid with co-counsel [.4]. Worked on claim form and banner ads [.7].	1.1	\$ 600.00	\$ 660.00
8/19/2024	BHC	Made final revisions to preliminary approval motion [1.2]. Worked with staff to finalize all settlement exhibits and sent same to defense counsel [.8]. Exchanged emails with client regarding signing settlement agreement [.2]. Email to settlement administrator regarding banner ads [.1].	2.3	\$ 600.00	\$ 1,380.00
8/19/2024	BHC	Worked on time records in preparation for filing fee motion [.2].	0.2	\$ 600.00	\$ 120.00
8/20/2024	BHC	Sent all signatures on settlement agreement to staff for assembly [.2]. Worked on defense counsel revisions to proposed final approval order; returned same to all counsel [.4]. Worked with staff on finalizing all preliminary approval documents for filing; approved same [1.3].	1.9	\$ 600.00	\$ 1,140.00
8/21/2024	BHC	Exchanged emails with co-counsel and administrator relating to administration costs [.3]. Responded to administrator inquiry regarding CAFA notice [.1].	0.4	\$ 600.00	\$ 240.00
8/22/2024	BHC	Exchanged emails with counsel for PillPack regarding class data [.1]. Reviewed CAFA notice cover letter [.2]. Worked on issues related to administration costs [.3].	0.6	\$ 600.00	\$ 360.00
8/23/2024	BHC	Exchanged emails with defense counsel and administrator regarding settlement notice procedures [.3].	0.3	\$ 600.00	\$ 180.00
8/26/2024	BHC	Exchanged emails with court regarding calculating date for final approval hearing [.2].	0.2	\$ 600.00	\$ 120.00
9/17/2024	BHC	Read and analyzed preliminary approval order [1.5]. Email to settlement administrator and all counsel regarding order and preliminary approval dates [.1]. Revised settlement notices in accordance with Court's preliminary approval order [1.4]; sent same to all counsel [.1].	3.1	\$ 600.00	\$ 1,860.00
9/26/2024	BHC	Worked on class notices [.8]; sent same to administrator [.2].	1	\$ 600.00	\$ 600.00
10/2/2024	BHC	Multiple emails and telephone call with administrator and counsel for PillPack regarding postcard notice form [.5].	0.5	\$ 600.00	\$ 300.00
10/3/2024	BHC	Worked on notice postcard and tear off claim form with defense counsel [.3]. Email to Mr. Payson regarding notice postcard [.3]. Worked on further revisions to notice postcard and claim form [.3]; sent same to settlement administrator [.1].	1	\$ 600.00	\$ 600.00
10/4/2024	BHC	Final review, revision, and approval of postcard notice [.4].	0.4	\$ 600.00	\$ 240.00
10/11/2024	BHC	Worked on issues related to settlement administration [.2].	0.2	\$ 600.00	\$ 120.00
10/14/2024	BHC	Worked on issues related to class notice list [.9].	0.9	\$ 600.00	\$ 540.00
10/15/2024	BHC	Video conference with Settlement Administrator regarding notice list [.8].	0.8	\$ 600.00	\$ 480.00
10/16/2024	BHC	Drafted proposed joint motion to extend class notice deadlines [.8].	0.8	\$ 600.00	\$ 480.00

Date	Timekeeper	Narrative	Units	Rate	Value
10/17/2024	BHC	Discussed administration problems with co-counsel [.3]. Worked on joint motion to extend notice deadlines [.2]. Meeting with counsel for PillPack and administrator regarding notice list issues [.5]. Revised stipulated motion to extend deadline per PillPack and approved same for filing [.1].	1.1	\$ 600.00	\$ 660.00
10/22/2024	BHC	Reviewed lengthy correspondence between settlement administrator and defense counsel; responded to same [.4].	0.4	\$ 600.00	\$ 240.00
		Statement Professional: Blythe Chandler	940.4		\$ 564,240.00
4/10/2019	BKK	Reviewed and revised complaint; prepared draft of civil cover sheet and summons.	1.1	\$ 225.00	\$ 247.50
4/12/2019	BKK	Reviewed, revised and finalized complaint; prepared civil cover sheet and summonses; arranged new case filing.	0.9	\$ 225.00	\$ 202.50
4/15/2019	BKK	Reviewed issued summonses; arranged service of process; prepared master caption; add contacts.	0.3	\$ 225.00	\$ 67.50
5/7/2019	BKK	Prepared draft and revised amended complaint.	0.2	\$ 225.00	\$ 45.00
5/8/2019	BKK	Finalized amended complaint; arranged filing and service.	0.1	\$ 225.00	\$ 22.50
5/22/2019	BKK	Reviewed, Payson, Francis, Rainwater and Fairchild notices of appearances [.2]; amended master caption and added same to contacts [.2]; prepared draft of Plaintiff's rule 26(a)(1) initial disclosures [.2].	0.6	\$ 225.00	\$ 135.00
6/11/2019	BKK	Reviewed, revised and finalized Plaintiff's first sets of interrogatories and requests for production [.7]; arranged service on counsel [.1].	0.8	\$ 225.00	\$ 180.00
7/8/2019	BKK	Reviewed, revised and finalized Plaintiff's rule 26(a)(1) initial disclosures; arranged service on counsel.	0.2	\$ 225.00	\$ 45.00
7/9/2019	BKK	Prepared draft of stipulation and proposed protective order [.4]; prepared draft of stipulation and proposed order regarding ESI [.4].	0.8	\$ 225.00	\$ 180.00
7/10/2019	BKK	Prepared compare version of stipulation and proposed protective order with model version.	0.4	\$ 225.00	\$ 90.00
7/11/2019	BKK	Prepared subpoena to produce package to Prospects DM, Inc. [.8]; internet research regarding corporate headquarters and registered agent information [.8].	1.6	\$ 225.00	\$ 360.00
8/6/2019	BKK	Prepared draft of meet and confer letter to opposing counsel.	0.1	\$ 225.00	\$ 22.50
8/7/2019	BKK	Reviewed, revised and finalized meet and confer letter to opposing counsel [.3]; email correspondence to counsel transmitting same [.1].	0.4	\$ 225.00	\$ 90.00
8/8/2019	BKK	Prepared subpoena to produce, notice of intent, cover letter and declaration of records custodian for Prospects DM, Inc. [.9]; prepared subpoena to produce, notice of intent, cover letter and declaration of records custodian for Performance Strategies [.9].	1.8	\$ 225.00	\$ 405.00
8/9/2019	BKK	Reviewed Walter Smith address change notice [.1]; amended master caption [.1]; reviewed Prospect DM, Inc. process service confirmation [.1].	0.3	\$ 225.00	\$ 67.50
8/19/2019	BKK	Reviewed, revised and finalized stipulation and proposed protective order [.2]; created redline version [.2]; arranged filing and service [.1]; transmitted proposed order to chambers [.1]; reviewed, revised and finalized stipulation and proposed order regarding ESI [.2]; created redline version [.2]; arranged filing and service [.1]; transmitted proposed order to chambers [.1].	1.2	\$ 225.00	\$ 270.00
9/3/2019	BKK	Prepared draft of joint prosecution agreement [.3]; reviewed Lauren Tsuji pro hac vice application and order [.1]; amended master caption [.1].	0.5	\$ 225.00	\$ 112.50
9/5/2019	BKK	Reviewed and revised joint prosecution agreement.	0.2	\$ 225.00	\$ 45.00
9/5/2019	BKK	Reviewed and finalized joint prosecution agreement [.1]; distribute executed version to co-counsel [.1]; prepared draft of Anthony Paronich pro hac vice application [.3]; email to Mr. Paronich regarding same [.1]; arranged filing and service [.1].	0.6	\$ 225.00	\$ 135.00
10/1/2019	BKK	Prepared draft of stipulation and proposed order extending case deadlines.	0.2	\$ 225.00	\$ 45.00
10/3/2019	BKK	Reviewed and revised subpoena to produce for Cricket Wireless [.2]; amended notice of intent regarding same [.1]; amended cover letter to Cricket Wireless [.2]; amended declaration of records custodian [.2]; reviewed client consent [.1]; prepared final subpoena package [.2].	1	\$ 225.00	\$ 225.00
10/4/2019	BKK	Reviewed and revised Plaintiff's 30(b)(6) deposition notice [.2]; prepared drafts of Geoff Swindle, Teague McKnight, Anja Ranneberg and Jesse Seastrand 30(b)(1) deposition notices [.6].	0.8	\$ 225.00	\$ 180.00

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10/7/2019	BKK	Prepared draft of subpoena to produce to Byte Success Marketing [.2]; prepared draft of exhibit A [.2]; prepared draft and finalized cover letter [.1]; prepared and finalized declaration of records custodian [.1]; prepared draft and finalized notice of intent to serve subpoena [.2]; arranged service on counsel [1].	1.8	\$ 225.00	\$ 405.00
10/17/2019	BKK	Respond to ABC Legal Service's report on service of process on Christina Anderson [.1]; conducted PeopleMap and internet research [.6].	0.7	\$ 225.00	\$ 157.50
1/15/2020	BKK	Prepared subpoena package to Little Brook Media [.8]; researched registered agent [.2]; confirmed address for service of process [.1]; arranged service on counsel [.1]; arranged service of process [.1].	1.3	\$ 225.00	\$ 292.50
2/4/2020	BKK	Prepared drafts of subpoena to produce packages for Yodel and Sharecare [1.8]; arranged service on counsel [.1]; arranged service of process [.2].	2.1	\$ 225.00	\$ 472.50
2/11/2020	BKK	Reviewed and revised Seastrand, McKnight and Swindle deposition notices [.3]; email correspondence to and from court reporter [.2].	0.5	\$ 225.00	\$ 112.50
2/12/2020	BKK	Email correspondence to and from court reporter regarding Utah deposition location [.2]; reviewed, revised and finalized Seastrand, McKnight and Swindle 30(b)(1) deposition notices [.6]; arranged service on counsel [.1].	0.9	\$ 225.00	\$ 202.50
2/19/2020	BKK	Prepared drafts and finalized McKnight, Seastrand, and Swindle 30(b)(1) deposition notices [.3]; email correspondence to and from court reporter [.2]; arranged service on counsel [.1].	0.6	\$ 225.00	\$ 135.00
2/24/2020	BKK	Email correspondence to counsel transmitting Byte Success Marketing documents.	0.2	\$ 225.00	\$ 45.00
3/5/2020	BKK	Prepared draft of stipulation and proposed order.	0.3	\$ 225.00	\$ 67.50
3/12/2020	BKK	Reviewed, revised and finalized stipulation and proposed order regarding call records [.2]; arranged filing and service [.1]; email correspondence to chambers transmitting same [.1]; prepared Little Book media declaration [.2].	0.6	\$ 225.00	\$ 135.00
3/31/2020	BKK	Reviewed, revised and finalized mediation questionnaire [.1]; arranged filing and service [.1].	0.2	\$ 225.00	\$ 45.00
4/1/2020	BKK	Prepared draft and finalized Plaintiff's disclosure of expert witnesses [.3]; transmitted same to counsel by email.	0.3	\$ 225.00	\$ 67.50
4/16/2020	BKK	Reviewed, revised and finalized Plaintiff's 30(b)(6) deposition notice [.4]; reviewed, revised and finalized Plaintiff's 30(b)(1) deposition notices for Geoff Swindle, Jesse Seastrand, Teague McKnight, Anja Ranneberg [.9]; arranged service on counsel by email [.1]; reviewed Rebecca Francis notice of withdrawal [.1]; amended master caption [.1].	1.6	\$ 225.00	\$ 360.00
4/17/2020	BKK	Prepared draft of letter to opposing counsel [.1]; prepared draft of LCR joint submission [.4].	0.5	\$ 225.00	\$ 112.50
4/20/2020	BKK	Reviewed and revised Plaintiff's answers and responses to Defendant's first set of interrogatories and requests for production.	1.3	\$ 225.00	\$ 292.50
4/22/2020	BKK	Reviewed, revised and finalized Plaintiff's responses to Defendant's first set of interrogatories and requests for production [.9]; assembled production [.1]; transmit same to counsel [.2].	1.1	\$ 225.00	\$ 247.50
5/4/2020	BKK	Reviewed, revised and finalized Plaintiff's objections to Verkhovskaya subpoena.	0.3	\$ 225.00	\$ 67.50
5/8/2020	BKK	Prepared drafts and finalized Swindle, Seastrand, McKnight and Ranneberg third amended deposition notices [.6]; prepared draft and finalized second amended 30(b)(6) deposition notice [.2].	0.8	\$ 225.00	\$ 180.00
5/12/2020	BKK	Revised and finalized Swindle, Seastrand, McKnight and Ranneberg third amended deposition notices [.6]; prepared draft and finalized second amended 30(b)(6) deposition notice [.2]; email correspondence to counsel transmitting same [.1].	0.9	\$ 225.00	\$ 202.50
5/26/2020	BKK	Prepared draft and finalized fourth amended Swindle deposition notice [.2]; prepared draft and finalized second amended Ranneberg deposition notice [.2]; prepared draft of fourth amended Seastrand deposition notice [.2]; prepared draft of fourth amended McKnight deposition notice [.2]; prepared draft of Plaintiff's third amended 30(b)(6) deposition notice [.3]; email correspondence to counsel transmitting same [.1]; email correspondence to court reporter [.1].	1.3	\$ 225.00	\$ 292.50
6/1/2020	BKK	Prepared draft and finalized Chandler notice of appearance [.2]; arranged filing and service [.1].	0.3	\$ 225.00	\$ 67.50
6/2/2020	BKK	Email correspondence to court reporter request Jeffrey Hansen deposition transcript [.1]; processed transcript and exhibits [.4].	0.5	\$ 225.00	\$ 112.50

Date	Timekeeper	Narrative	Units	Rate	Value
6/9/2020	BKK	Reviewed, revised and finalized letter to opposing counsel regarding meet and confer issues [.3]; reviewed, revised and finalized Plaintiff's second set of requests for production [.4]. email correspondence to counsel transmitting same [.1].	0.8	\$ 225.00	\$ 180.00
6/22/2020	BKK	Prepared drafts and finalized subpoena and notice of intent for Christine Smith [.4]; email correspondence to counsel transmitting same [.1]; prepared drafts of subpoena and notice of intent for Ken Sponsler [.4].	0.9	\$ 225.00	\$ 202.50
6/23/2020	BKK	Prepared draft and finalized expert Sponsler subpoena to testify [.2]; prepared draft and finalized notice of intent to serve subpoena [.2]; email correspondence to counsel transmitting same [.1]; processed Swindle deposition exhibits [.3].	0.8	\$ 225.00	\$ 180.00
6/30/2020	BKK	Prepared draft and finalized amended Anderson subpoena to testify [.1]; prepared draft and finalized Anderson amended notice of intent [.1]; email correspondence to counsel transmitting same [.1].	0.3	\$ 225.00	\$ 67.50
7/1/2020	BKK	Prepared draft of Plaintiff's motion for class certification [.2]; prepared draft of Terrell declaration supporting same [.1]; prepared draft of Aaron Williams declaration [.2].	0.5	\$ 225.00	\$ 112.50
7/22/2020	BKK	Received Christina Anderson deposition transcript and exhibits.	0.2	\$ 225.00	\$ 45.00
7/23/2020	BKK	Prepared draft of motion to seal [.2]; prepared draft of Murray supporting declaration [.2]; prepared draft of proposed order [.2].	0.6	\$ 225.00	\$ 135.00
7/24/2020	BKK	Reviewed, revised and finalized motion for class certification [2.5]; finalized Williams, Smith, Terrell and Paronich declarations [.9]; reviewed, revised and finalized motion to seal, Chandler supporting declaration and proposed order [.7]; assembled exhibits [.8]; email correspondence to chambers transmitting proposed order [.1]; email correspondence to counsel transmitting sealed documents [.2].	5.2	\$ 225.00	\$ 1,170.00
8/6/2020	BKK	Prepared draft of subpoena to testify for Mark Dorf [.2]; prepared notice of intent to serve subpoena regarding same [.1]; prepared draft of subpoena to testify for Tyler Hunt [.2]; prepared notice of intent to serve subpoena regarding same [.1].	0.6	\$ 225.00	\$ 135.00
8/10/2020	BKK	Prepared draft of reply in support of motion to seal [.2]; reviewed, revised and finalized Plaintiff's response to motion to stay [1.1]; reviewed, revised and finalized Chandler supporting declaration and exhibits [.4]; finalized proposed order [.2]; reviewed, revised and finalized motion to seal [.1]; prepared draft and finalized Chandler supporting declaration [.2]; prepared draft and finalized proposed order [.1]; arranged filing and service [.3]; email correspondence to counsel transmitting sealed document [.1].	2.7	\$ 225.00	\$ 607.50
8/12/2020	BKK	Revised proposed order regarding motion to seal.	0.3	\$ 225.00	\$ 67.50
8/20/2020	BKK	Prepared draft of Prospects DM subpoena to testify [.1]; prepared draft of 30(b)(6) deposition notice [.1].	0.2	\$ 225.00	\$ 45.00
8/21/2020	BKK	Prepared draft of LCR 37 submission [.2]; finalized Prospects DM 30(b)(6) notice and subpoena to testify [.2]; arranged service of counsel by email [.1].	0.5	\$ 225.00	\$ 112.50
8/24/2020	BKK	Reviewed, revised and finalized reply in support of motion to seal [.1]; reviewed, revised and finalized proposed order [.1]; arranged filing and service [.1]; email correspondence to chambers transmitting proposed order [.1].	0.4	\$ 225.00	\$ 90.00
8/28/2020	BKK	Arranged filing and service of unsealed exhibits and revised sealed exhibits in response to order on motion to seal.	0.6	\$ 225.00	\$ 135.00
9/1/2020	BKK	Reviewed order on judicial reassignment [.1]; amended master caption [.1].	0.2	\$ 225.00	\$ 45.00
9/2/2020	BKK	Reviewed and revised reply in support of motion for class certification.	0.3	\$ 225.00	\$ 67.50
9/4/2020	BKK	Prepared draft and finalized stipulation exceeding page limits [.4]; arranged filing and service [.1]; email correspondence to chambers transmitting same [.1]; reviewed, revised and finalized reply in support of motion for class certification [2.2]; finalized Terrell supplemental declaration [.2]; assembled exhibits [.2]; arranged filing and service [.2].	3.4	\$ 225.00	\$ 765.00
9/7/2020	BKK	Prepared draft and finalized praecipe to replace [.2]; reviewed, revised and finalized reply in support of motion for class certification [1.1]; arranged filing and service [.1].	1.4	\$ 225.00	\$ 315.00
9/8/2020	BKK	Prepared draft of Fluent, Inc. 30(b)(6) notice.	0.3	\$ 225.00	\$ 67.50
9/14/2020	BKK	Prepared draft of response to Defendant's motion for summary judgment.	0.2	\$ 225.00	\$ 45.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/15/2020	BKK	Prepared drafts of Fluent subpoena to produce and subpoena to testify, notice of 30(b)(6) deposition and exhibits.	2.2	\$ 225.00	\$ 495.00
9/18/2020	BKK	Prepared draft of Murray declaration in support of Plaintiff's response to Defendant's motion for summary judgment [.2]; prepared drafts of Fluent, Inc. subpoena to produce and subpoena to testify packages [.8]; research regarding registered agent status [.3]; reviewed, revised and finalized Daniel Barsky subpoena to testify package [.6]; email service to counsel transmitting same [.2]; arranged service of process on Fluent, Inc. and Daniel Barsky [.3].	2.4	\$ 225.00	\$ 540.00
9/21/2020	BKK	Email correspondence to and from ABC Legal Services regarding Barsky subpoena bad address [.3]; research regarding Barsky's Fire Island address [1.3]; reviewed, revised and finalized Plaintiff's response to Defendant's motion for summary judgment [3.2]; reviewed, revised and finalized Murray declaration and exhibits in support thereof [.9]; prepared drafts and finalized motion to seal, Murray supporting declaration and proposed order [.6]; arranged filing and service [.3]; email correspondence to counsel transmitting sealed documents [.2]	6.8	\$ 225.00	\$ 1,530.00
10/6/2020	BKK	Draft reply in support of motion to seal.	0.2	\$ 225.00	\$ 45.00
10/7/2020	BKK	Reviewed, revised and finalized reply in support of motion to seal [.1]; reviewed, revised and finalized Chandler support declaration and exhibit [.2]; arranged filing and service [.1]; reviewed email correspondence from opposing counsel [.1]; telephone conference with court clerk [.1]; redacted Chandler exhibit [.1]; arranged filing and service [.1].	0.8	\$ 225.00	\$ 180.00
10/23/2020	BKK	Reviewed Franz notice of appearance [.1]; amended master caption [.1].	0.2	\$ 225.00	\$ 45.00
11/12/2020	BKK	Prepared drafts and finalized subpoena to produce documents package to Better Business Bureau Northwest and Pacific [.5]; Prepared drafts and finalized subpoena to produce documents package to Better Business Bureau of Northern Nevada and Utah [.5]; arranged service by email on counsel [.1]; arranged service of process [.2].	1.3	\$ 225.00	\$ 292.50
11/13/2020	BKK	Prepared draft and finalized subpoena to produce package to State of Utah [.5]; prepared drafts and finalized subpoena to produce package to State of Washington [.5]; prepared draft and finalized subpoena to produce package to State of California [.5]; prepared drafts and finalized subpoena to produce package to Federal Trade Commission [.5]; reviewed and researched registered agent status [.3]; email correspondence to counsel transmitting same [.1]; arranged service of process [.4].	2.8	\$ 225.00	\$ 630.00
11/30/2020	BKK	Prepared draft of motion to amend motion for class certification [.3]; prepared supporting Murray declaration [.2]; prepared draft of proposed order [.2].	0.7	\$ 225.00	\$ 157.50
		Statement Professional: Bradford Kinsey	70	\$	\$ 15,750.00
1/17/2020	BMD	Research regarding TCPA lawsuits against PillPack [1.8].	1.8	\$ 400.00	\$ 720.00
9/4/2020	BMD	Telephone conference regarding "supplemental" declaration [.2].	0.2	\$ 400.00	\$ 80.00
10/7/2020	BMD	Reviewed and analyzed reply to motion to seal [.1].	0.1	\$ 400.00	\$ 40.00
1/15/2021	BMD	Reviewed minute order regarding class certification and telephone conference regarding same [.5].	0.5	\$ 400.00	\$ 200.00
1/29/2021	BMD	Reviewed case file and telephone conference regarding joint status report [.4].	0.4	\$ 400.00	\$ 160.00
3/11/2021	BMD	Reviewed documents regarding notice issues, telephone conference regarding same [1.1]; reviewed proposed notice plan and email correspondence regarding same [.4].	1.5	\$ 400.00	\$ 600.00
10/5/2021	BMD	Reviewed and analyzed motion to seal and sealed exhibits [.9]; email correspondence regarding response to motion to seal [.1].	1	\$ 400.00	\$ 400.00
10/7/2021	BMD	Reviewed sealed exhibits, analyzed issues regarding response to motion to seal, worked on outline [1.2].	1.2	\$ 400.00	\$ 480.00
10/11/2021	BMD	Worked on response to motion to seal [1.5].	1.5	\$ 400.00	\$ 600.00
10/12/2021	BMD	Reviewed case documents, exhibits, declarations, and worked on response to motion to seal [6].	6	\$ 400.00	\$ 2,400.00
10/13/2021	BMD	Worked on response to motion to seal, revised same [4].	4	\$ 400.00	\$ 1,600.00
10/14/2021	BMD	Revised response to motion to seal [.2]; email correspondence regarding same [.1]; analyzed issues regarding service of third parties [.2]; email correspondence regarding same [.1]	0.6	\$ 400.00	\$ 240.00
10/15/2021	BMD	Finalized response to motion to seal [.4].	0.4	\$ 400.00	\$ 160.00

Date	Timekeeper	Narrative	Units	Rate	Value
		Statement Professional: Ben Drachler	19.2		\$ 7,680.00
5/26/2022	EAA	Personal conference regarding law of the case issue for revised class certification motion.	0.3	\$ 500.00	\$ 150.00
		Statement Professional: Elizabeth Adams	0.3		\$ 150.00
9/19/2019	HB	Loaded production into Eclipse and updated production log [1.3].	1.3	\$ 225.00	\$ 292.50
9/26/2019	HB	Downloaded production, loaded production into Eclipse, and updated production log [.7].	0.7	\$ 225.00	\$ 157.50
10/30/2019	HB	Worked on loading defendant's production into Eclipse [.5].	0.5	\$ 225.00	\$ 112.50
11/4/2019	HB	Worked on troubleshooting production load issues [.2].	0.2	\$ 225.00	\$ 45.00
2/26/2020	HB	Worked on loading defendant's production into Eclipse [.7].	0.7	\$ 225.00	\$ 157.50
3/6/2020	HB	Worked on loading production into Eclipse [1.0].	1	\$ 225.00	\$ 225.00
4/23/2020	HB	Worked on processing production into Eclipse and updating production log [1.3].	1.3	\$ 225.00	\$ 292.50
4/28/2020	HB	Worked on logging and loading production documents into Eclipse [2.0].	2	\$ 225.00	\$ 450.00
5/5/2020	HB	Logged and loaded document production into Eclipse [.8].	0.8	\$ 225.00	\$ 180.00
5/6/2020	HB	Logged and loaded document production into Eclipse [.8].	0.8	\$ 225.00	\$ 180.00
7/24/2020	HB	Worked on preparing exhibits for filing in support of motion for class certification [3.5].	3.5	\$ 225.00	\$ 787.50
9/21/2020	HB	Worked on preparing and finalizing exhibits in support of opposition to motion for summary judgment [3.4].	3.4	\$ 225.00	\$ 765.00
12/22/2020	HB	Worked on plaintiffs motion to supplement [.5].	0.5	\$ 225.00	\$ 112.50
		Reviewed court order and defendant's response to motion to seal [.4]; Updated redactions on exhibits in support of opposition to motion for summary judgment [.4].	0.8	\$ 225.00	\$ 180.00
1/11/2021	HB	Worked on redacting exhibits for refile in open court [.3].	0.3	\$ 225.00	\$ 67.50
2/5/2021	HB	Prepared and finalized declaration and exhibit in support of supplemental class certification brief [.4].	0.4	\$ 225.00	\$ 90.00
3/11/2021	HB	Worked on finalizing exhibits in support of motion to approve notice plan [.7].	0.7	\$ 225.00	\$ 157.50
3/29/2021	HB	Prepared to serve and served supplemental third party production [.6].	0.6	\$ 225.00	\$ 135.00
3/30/2021	HB	Prepared and served supplemental production on counsel [2.1].	2.1	\$ 225.00	\$ 472.50
3/31/2021	HB	Prepared additional correspondence for production to counsel [1.1].	1.1	\$ 225.00	\$ 247.50
		Reviewed additional emails for production [.4]; Prepared and finalized exhibits in support of reply in support of notice plan [.9].	1.3	\$ 225.00	\$ 292.50
4/2/2021	HB	Processed documents for production and served same on counsel [1.9].	1.9	\$ 225.00	\$ 427.50
4/16/2021	HB	Loaded production into lpro [.5].	0.5	\$ 225.00	\$ 112.50
6/21/2021	HB	Loaded various document productions into lpro [1.4].	1.4	\$ 225.00	\$ 315.00
8/25/2021	HB	Loaded document production into lpro [.3].	0.3	\$ 225.00	\$ 67.50
9/24/2021	HB	Loaded document production into lpro [.3].	0.3	\$ 225.00	\$ 67.50
10/5/2021	HB	Worked on shell documents for reply in support of motion to amend class definition [.4].	0.4	\$ 225.00	\$ 90.00
10/8/2021	HB	Worked on exhibits in support of motion to amend class definition [2.6].	2.6	\$ 225.00	\$ 585.00
10/27/2021	HB	Loaded third party productions into lpro [.5].	0.5	\$ 225.00	\$ 112.50
10/29/2021	HB	Assisted with finalizing exhibits in support of reply in support of motion to modify class definition [.2].	0.2	\$ 225.00	\$ 45.00
6/3/2022	HB	Assisted with finalizing exhibits in support of class certification reply [.2].	0.2	\$ 225.00	\$ 45.00
4/6/2023	HB	Worked on motion to extend, declaration and exhibits in support thereof [.4].	0.4	\$ 225.00	\$ 90.00
8/23/2023	HB	Worked on declaration and exhibits in support of motion to compel [3.0].	3	\$ 225.00	\$ 675.00
12/15/2023	HB	Worked on docketing case deadlines [.1].	0.1	\$ 225.00	\$ 22.50
5/28/2024	HB	Prepared exhibits in support of mediation submission [.6].	0.6	\$ 225.00	\$ 135.00
8/12/2024	HB	Worked on motion for preliminary approval [.3].	0.3	\$ 225.00	\$ 67.50
9/26/2024	HB	Gathered and transmitted class notice documents to counsel and settlement administrator [.3].	0.3	\$ 225.00	\$ 67.50
10/2/2024	HB	Worked on gathering and transmitting updated class notice documents to settlement administrator [.3].	0.3	\$ 225.00	\$ 67.50
		Statement Professional: Heather Brown	37.3		\$ 8,392.50
2/3/2021	HK	Commenced research project.	1.4	\$ 125.00	\$ 175.00

Date	Timekeeper	Narrative	Units	Rate	Value
2/4/2021	HK	Completed research project.	2	\$ 125.00	\$ 250.00
		Statement Professional: Hannah Kern	3.4	\$	\$ 425.00
9/6/2019	HMR	Worked on stipulated motion to extend time to file motion for class certification.	0.6	\$ 225.00	\$ 135.00
10/3/2019	HMR	Worked on and finalized notice of intent to serve, subpoena to produce documents, written consent of Aaron Williams, letter enclosing subpoena and declaration of records custodian; emailed same to counsel for all parties; coordinated with ABC Legal for service of same.	0.4	\$ 225.00	\$ 90.00
10/23/2019	HMR	Worked on subpoena to produce documents to Byte Success Marketing, LLC, exhibit a to subpoena, letter enclosing same, declaration of records custodian and ABC process service form; electronically submitted same to ABC Legal Services.	0.4	\$ 225.00	\$ 90.00
10/28/2019	HMR	Pulled proof of service from ABC Legal for Byte Success Marketing, LLC	0.2	\$ 225.00	\$ 45.00
5/28/2020	HMR	Notarized written consent for disclosure of Cricket Wireless LLC.	0.2	\$ 225.00	\$ 45.00
7/17/2020	HMR	Worked on transcript order form; emailed same to Marisa Munoz-Vourakis for completion.	0.3	\$ 225.00	\$ 67.50
7/31/2020	HMR	Worked on and finalized subpoena to testify to Roger Castro, notice of intent to serve, and notice of deposition; emailed same to counsel for all parties; coordinated with ABC Legal for service of same.	0.6	\$ 225.00	\$ 135.00
8/3/2020	HMR	Confirmed status of service on Roger Castro.	0.3	\$ 225.00	\$ 67.50
11/23/2020	HMR	Worked on subpoena to produce documents to Better Business Bureau, letter enclosing same, declaration of records custodian and notice of intent to serve.	1	\$ 225.00	\$ 225.00
11/30/2020	HMR	Worked on and finalized notice of intent to serve, subpoena to produce, declaration of records custodian and letter enclosing same; emailed same to counsel for all parties; coordinated with ABC Legal for service of same.	1	\$ 225.00	\$ 225.00
11/12/2021	HMR	Worked on reply in support of plaintiff's motion to file confidential documents under seal or in open court and to unseal previously sealed documents and reply in support of plaintiff's motion to supplement the record regarding plaintiff's motion for class certification.	0.4	\$ 225.00	\$ 90.00
11/14/2021	HMR	Worked on filing of unsealed exhibits and response brief.	0.5	\$ 225.00	\$ 112.50
2/5/2021	HMR	Worked on and finalized joint status report, supplemental brief in support of motion for class certification, declaration of Jennifer Rust Murray in support of same; electronically filed same.	1.5	\$ 225.00	\$ 337.50
9/16/2021	HMR	Worked on and finalized subpoenas to testify directed to Nexxa Group, LexisNexis, Citadel Marketing Group, Tyler Hunt and Prospects DM, Inc., schedule a (4) certificate of service; emailed same to counsel for all parties; coordinated service of subpoena directed to Tyler Hunt and Prospects DM, Inc.	3	\$ 225.00	\$ 675.00
10/29/2021	HMR	Worked on and finalized supplemental reply in support of motion to modify class definition, proposed order, declaration of Jennifer Rust Murray with exhibits, declaration of Jodi Nuss, motion to seal, proposed order, declaration of Amanda Steiner, plaintiff's second amended motion to approve notice plan, exhibits a-e and supplemental declaration of Cameron R. Azari; electronically filed same; emailed unredacted copies of exhibits to counsel for all parties.	2.5	\$ 225.00	\$ 562.50
11/18/2021	HMR	Worked on and finalized letter to Eric Franz regarding Vestige work; emailed same along with bates-stamped documents to counsel for all parties.	0.5	\$ 225.00	\$ 112.50
4/22/2022	HMR	Worked on and finalized plaintiff's renewed motion for class certification [1.5]; worked on and finalized declaration of Jennifer Rust Murray, exhibits, proposed order, motion to seal, declaration of Blythe H. Chandler in support of same, proposed order; worked on and finalized notice of filing paper materials; electronically filed same; electronically filed sealed documents; emailed proposed orders to judge; emailed unsealed exhibits and motion to counsel for all parties [4.5]	6	\$ 225.00	\$ 1,350.00
4/25/2022	HMR	Worked on ABC delivery form for delivery of flash drives; coordinated same with ABC Messengers [.1]; worked on and finalized notice of filing paper materials regarding exhibits 11, 13-15 and 17; electronically filed same [.2]	0.3	\$ 225.00	\$ 67.50
5/16/2023	HMR	Worked on plaintiff's motion to enforce subpoena duces tecum directed to T-Mobile USA, Inc., proposed order, declaration of Blythe H. Chandler and notice of related case; worked on motion to enforce subpoena duces tecum directed to Verizon, proposed order, note for motion, declaration of Blythe H. Chandler, motion to transfer venue, proposed order and note for motion. [2]	2	\$ 225.00	\$ 450.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/17/2023	HMR	Worked on plaintiff's motion to enforce subpoena duces tecum directed to T-Mobile USA, Inc., proposed order, declaration of Blythe H. Chandler and notice of related case; worked on motion to enforce subpoena duces tecum directed to Verizon, proposed order, note for motion, declaration of Blythe H. Chandler, motion to transfer venue, proposed order and note for motion. [.5]	0.5	\$ 225.00	\$ 112.50
5/18/2023	HMR	Worked on and finalized plaintiff's motion to enforce subpoenaed duces tecum directed to T-Mobile USA, Inc., proposed order, declaration of Blythe H. Chandler and notice of related case; emailed same to WDWA clerk for filing [1]	1	\$ 225.00	\$ 225.00
5/25/2023	HMR	Worked on and finalized unopposed motion to enforce subpoena duces tecum directed to T-Mobile USA, Inc., declaration of Blythe H. Chandler in support of same, proposed order; electronically filed same [.6]	0.6	\$ 225.00	\$ 135.00
7/28/2023	HMR	Worked on and finalized stipulated motion to extend deadline, declaration of Blythe H. Chandler in support of same; electronically filed same; emailed proposed order to Judge [.5]	0.5	\$ 225.00	\$ 112.50
8/1/2023	HMR	Worked on and finalized letter to Defendant regarding communications with Epiq. [.3]	0.3	\$ 225.00	\$ 67.50
5/24/2024	HMR	Worked on plaintiff's mediation statement. [.4]	0.4	\$ 225.00	\$ 90.00
5/28/2024	HMR	Worked on and finalized plaintiff's mediation statement and exhibits; emailed same to mediator. [.5]	0.5	\$ 225.00	\$ 112.50
		Statement Professional: Holly Rota	25.5	\$	5,737.50
9/1/2019	JJB	Created case document database; created production log; updated production log; loaded third party production in case document database.	0.5	\$ 295.00	\$ 147.50
12/16/2019	JJB	Labeled and processed third party production; loaded production into case document database; updated production log; transmitted production to opposing counsel.	1.2	\$ 295.00	\$ 354.00
5/15/2020	JJB	Telephone conference regarding deposition preparation.	0.4	\$ 295.00	\$ 118.00
5/18/2020	JJB	Read complaint; read deposition notices.; worked on document review; worked on document review; reviewed third party declarations.	5.1	\$ 295.00	\$ 1,504.50
5/19/2020	JJB	Worked on document and data review; telephone conference regarding same; worked on production issues; managed case document database; read document review summary; correspondence regarding deposition preparation.	5.2	\$ 295.00	\$ 1,534.00
5/19/2020	JJB	Worked on document review.	4.1	\$ 295.00	\$ 1,209.50
5/20/2020	JJB	Worked on document review; correspondence regarding data.	5	\$ 295.00	\$ 1,475.00
5/21/2020	JJB	Worked on document review; correspondence regarding same; repaired defendant's productions; correspondence regarding same.	5.3	\$ 295.00	\$ 1,563.50
5/22/2020	JJB	Worked on document review; processed, loaded and logged defendant's document production.	6.5	\$ 295.00	\$ 1,917.50
5/26/2020	JJB	Worked on data and document review.	3.6	\$ 295.00	\$ 1,062.00
5/27/2020	JJB	Worked on data and document review; correspondence regarding deposition preparation.	3.7	\$ 295.00	\$ 1,091.50
5/28/2020	JJB	Worked on discovery issues [.3].	0.3	\$ 295.00	\$ 88.50
5/28/2020	JJB	Worked on chronology of key documents; training for deposition software; telephone conferences regarding deposition preparation.	6.9	\$ 295.00	\$ 2,035.50
5/29/2020	JJB	Worked on deposition preparation.	0.3	\$ 295.00	\$ 88.50
5/29/2020	JJB	Worked on troubleshooting issues with exhibits in remote deposition.	0.2	\$ 295.00	\$ 59.00
5/31/2020	JJB	Worked on pulling documents for deposition preparation; reviewed outline; correspondence regarding same.	1.5	\$ 295.00	\$ 442.50
6/1/2020	JJB	Worked on case chronology.	7.8	\$ 295.00	\$ 2,301.00
6/2/2020	JJB	Updated remote deposition calendar information.	0.1	\$ 295.00	\$ 29.50
6/2/2020	JJB	Pulled documents for deposition exhibits; updated deposition calendar information.	0.5	\$ 295.00	\$ 147.50
6/3/2020	JJB	Worked on document review; correspondence regarding same;	1	\$ 295.00	\$ 295.00
6/4/2020	JJB	Worked on researching and printing third party web archive; correspondence regarding same; worked on document review; worked on pulling exhibits for deposition; updated chronology.	3.2	\$ 295.00	\$ 944.00
6/5/2020	JJB	Worked on repairing corrupt file produced by defendant.	0.4	\$ 295.00	\$ 118.00
6/8/2020	JJB	Correspondence regarding deposition transcripts.	0.1	\$ 295.00	\$ 29.50
6/11/2020	JJB	Telephone conferences regarding transcription of audio files.	0.3	\$ 295.00	\$ 88.50

Date	Timekeeper	Narrative	Units	Rate	Value
6/15/2020	JJB	Reviewed and compiled deposition exhibits; correspondence regarding same.	0.5	\$ 295.00	\$ 147.50
6/16/2020	JJB	Compiled and converted corrupt deposition exhibits for court reporter; correspondence regarding same.	1.5	\$ 295.00	\$ 442.50
6/18/2020	JJB	Correspondence with court reporter regarding deposition exhibits.	0.1	\$ 295.00	\$ 29.50
6/19/2020	JJB	Attempted to download video deposition; correspondence with court reporter regarding same; downloaded and filed deposition video.	0.2	\$ 295.00	\$ 59.00
6/22/2020	JJB	Updated case chronology.	0.8	\$ 295.00	\$ 236.00
6/23/2020	JJB	Reviewed correspondence history regarding deposition testimony.	0.1	\$ 295.00	\$ 29.50
6/27/2020	JJB	Pulled and prepared exhibits for deposition; downloaded deposition exhibit from court reporter; updated chronology.	1.7	\$ 295.00	\$ 501.50
1/7/2021	JJB	Processed and loaded defendant's production; updated production; analyzed data; telephone conference regarding same.	1.2	\$ 295.00	\$ 354.00
4/9/2021	JJB	Worked on data analysis.	0.2	\$ 295.00	\$ 59.00
6/4/2021	JJB	Analyzed third party data; correspondence regarding same.	0.5	\$ 295.00	\$ 147.50
9/13/2021	JJB	Analyzed third party data.	0.5	\$ 295.00	\$ 147.50
9/14/2021	JJB	Reviewed third party documents.	0.3	\$ 295.00	\$ 88.50
9/16/2021	JJB	Prepared exhibits for deposition; telephone conference regarding same.	0.8	\$ 295.00	\$ 236.00
9/17/2021	JJB	Correspondence regarding deposition preparation.	0.6	\$ 295.00	\$ 177.00
Statement Professional: Jennifer Boschen			72.2	\$	\$ 21,299.00
4/8/2019	JKM	Worked on investigation of Pill Pack, LLC.	0.8	\$ 100.00	\$ 80.00
4/9/2019	JKM	Worked on pulling documents.	2.5	\$ 100.00	\$ 250.00
Statement Professional: Jordan Martin			3.3	\$	\$ 330.00
7/8/2019	JN	Reviewed and analyzed calling data for finalizing initial disclosures.[.1]; Personal conference regarding same.[.1]	0.2	\$ 295.00	\$ 59.00
7/9/2019	JN	Personal conference regarding preparation of production to accompany initial disclosures.[.2]; Prepared call log and call recording for production.[.2]	0.4	\$ 295.00	\$ 118.00
8/26/2019	JN	Reviewed email from Mr. Dorf enclosing objections to subpoena issued to Performance Media Strategies.[.1]	0.1	\$ 295.00	\$ 29.50
9/4/2019	JN	Reviewed email from Mr. Dorf enclosing production documents.[.1]	0.1	\$ 295.00	\$ 29.50
9/6/2019	JN	Reviewed email requesting transfer of files in PL and eclipse and prepared response to same.[.1]; Reviewed contents of production database to determine size of transmission.[.1]; Prepared email requesting upload of documents to ShareFile.[.1]	0.3	\$ 295.00	\$ 88.50
9/12/2019	JN	Personal conference regarding bates stamping and production project.[.1]; Prepared email enclosing documents for stamping.[.1]; Reviewed email from Mr. Smith regarding third party subpoenas.[.1]; Prepared email to all counsel enclosing production documents.[.1]	0.4	\$ 295.00	\$ 118.00
9/13/2019	JN	Updated production log and imported recent productions into Eclipse.[.3]; Prepared email requesting authorization to produce documents produced by Prospects.[.1]	0.4	\$ 295.00	\$ 118.00
9/17/2019	JN	Personal conference regarding call to AT&T for document preservation schedule.[.1]	0.1	\$ 295.00	\$ 29.50
9/18/2019	JN	Prepared email enclosing form documents for preparation of subpoena.[.1]; Reviewed email enclosing draft subpoena to Cricket Wireless and prepared response to same.[.1]; Prepared email to Mr. Dietrich enclosing draft subpoena to Cricket Wireless.[.1]	0.3	\$ 295.00	\$ 88.50
9/19/2019	JN	Personal conference regarding Byte Success subpoena.[.1]; Reviewed email requesting creation of Publish file and prepared response to same.[.1]; Created Publish file for Mr. Paronich.[.1]; Prepared email to Mr. Paronich enclosing Publish file.[.1]	0.4	\$ 295.00	\$ 118.00
9/23/2019	JN	Bates stamped documents produced by Performance Media and loaded same into Eclipse database.[.1]; Updated production log.[.1]	0.2	\$ 295.00	\$ 59.00
9/25/2019	JN	Personal conference regarding processing of recently received documents.[.1]	0.1	\$ 295.00	\$ 29.50
9/27/2019	JN	Personal conference regarding search term revisions.[.3]	0.3	\$ 295.00	\$ 88.50

Date	Timekeeper	Narrative	Units	Rate	Value
9/27/2019	JN	Reviewed document review memo from Mr. Paronich and revised search terms.[.5]; Reviewed email regarding further consolidation of queries and prepared response to same.[.1]	0.6	\$ 295.00	\$ 177.00
10/2/2019	JN	Personal conference regarding cell phone scrub and production of third party responses to defense counsel.[.2]	0.2	\$ 295.00	\$ 59.00
10/2/2019	JN	Worked on processing natives produced by Prospects DM to get documents ready for loading into Eclipse.[.5]; Logged and loaded production documents.[.5]; Prepared email summarizing status of productions.[.1]; Reviewed email from Mr. Smith enclosing signed consent form for subpoena to Cricket and prepared response to same.[.1]; Prepared email requesting revision of subpoena to Cricket Wireless.[.1]	1.3	\$ 295.00	\$ 383.50
10/3/2019	JN	Personal conference regarding Cricket subpoena and document production.[.2]; Created Publish file including new productions and uploaded same to ShareFile.[.2]; Prepared email to co-counsel enclosing link to publish file.[.1]; Reviewed draft subpoena and prepared email regarding same.[.1]	0.6	\$ 295.00	\$ 177.00
10/3/2019	JN	Logged and loaded production documents into Eclipse.[.3]; Reviewed email requesting status update on subpoena to Byte Success and prepared response to same.[.1]; Reviewed email from Mr. Paronich requesting reissuance of subpoena to Byte Success and prepared response to same.[.1]	0.5	\$ 295.00	\$ 147.50
10/4/2019	JN	Conducted online research for additional addresses to use for service of subpoena to Byte Success marketing.[.3]; Prepared email regarding findings of same.[.1]; Prepared email to Mr. Paronich requesting guidance on addresses for service of subpoena on Byte Success and reviewed response to same.[.1]; Prepared email requesting preparation of subpoena to address identified by Mr. Paronich.[.1]	0.6	\$ 295.00	\$ 177.00
10/7/2019	JN	Exported third party subpoena responses for production to all counsel.[.4]; Reviewed email from Mr. Paronich enclosing new documents from Prospects DM and retrieved same.[.2]; Personal conference regarding production of same.[.1]; Prepared draft email to all counsel explaining production documents.[.1]; Updated production log.[.1]; Personal conference regarding Dropbox problems.[.2]; Prepared email to co-counsel regarding erroneous extraction of documents at Dropbox link.[.2]	1.3	\$ 295.00	\$ 383.50
10/9/2019	JN	Reviewed email from Mr. Smith regarding revisions to search terms.[.1]; Prepared email regarding reproduction of documents previously sent via Dropbox.[.1]	0.2	\$ 295.00	\$ 59.00
10/10/2019	JN	Reviewed email regarding agenda for meet and confer and prepared response to same.[.1]; Reviewed search term hit reports.[.3]; Personal conference regarding same.[.1]; Prepared email enclosing draft questions for meet and confer call.[.2]; Participated in meet and confer call.[.5];	1.2	\$ 295.00	\$ 354.00
10/10/2019	JN	Production load.[.2]; Personal conference regarding data analysis.[.2]; Exported third party subpoena responses to produce to opposing counsel.[.2]; Uploaded documents to ShareFile and prepared email to all counsel enclosing link to same.[.2]	0.8	\$ 295.00	\$ 236.00
10/17/2019	JN	Reviewed email regarding inability to serve subpoena on Byte Success and prepared response to same.[.1]; Reviewed email enclosing PeopleMap report for references to Byte Success.[.1]	0.2	\$ 295.00	\$ 59.00
10/18/2019	JN	Reviewed email from Ms. Mitterndorfer enclosing production documents and retrieved same.[.1]; Updated production log.[.1]; Attempted to load production into Eclipse.[.1]; Personal conference regarding troubleshooting of defective load file.[.1]; Telephone conference with Ms. Mitterndorfer regarding same.[.1]; Prepared email to Ms. Mitterndorfer enclosing screenshot of defect in load file.[.1]	0.6	\$ 295.00	\$ 177.00
10/21/2019	JN	Reviewed email from Ms. Mitterndorfer enclosing corrected load file and prepared response to same.[.1]; Reviewed email from Mr. Paronich regarding request for Publish file and response to same.[.1]; Imported production documents into Eclipse.[.2]; Created Publish file for Mr. Paronich.[.1]; Prepared email to Mr. Paronich enclosing ShareFile link to same.[.1]; Personal conference regarding need to push back on search terms proposed by plaintiff.[.4]	1	\$ 295.00	\$ 295.00
10/22/2019	JN	Reviewed email from Ms. Mitterndorfer regarding problems with production format and prepared response to same.[.1]; Exported revised production in format requested by DWT data team.[.2]	0.3	\$ 295.00	\$ 88.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/22/2019	JN	Reviewed documents produced by PillPack for presence of plaintiff's proposed search terms.[.3]; Conducted online research into Ms. Anderson to confirm address for service of subpoena to Byte Success.[.2]; Prepared email regarding same.[.1]; Prepared email requesting revision of subpoena to Byte Success using new address.[.1]; Personal conference regarding Hunt emails and negotiation of search terms.[.3]; Reviewed production documents for emails naming Mr. Hunt and for overall date range of produced emails.[.1]	1.1	\$ 295.00	\$ 324.50
10/28/2019	JN	Reviewed email enclosing AT&T's response to subpoena.[.1]; Reviewed emails regarding service of subpoena on Byte Success.[.1]; Reviewed email regarding preparation of subpoena to Ms. Anderson directly and prepared response to same.[.1]	0.3	\$ 295.00	\$ 88.50
10/28/2019	JN	Retrieved AT&T's production documents from secure site and applied bates numbering.[.3]; Logged and loaded same into Eclipse.[.2]	0.5	\$ 295.00	\$ 147.50
10/29/2019	JN	Reviewed email regarding production of Cricket Wireless responses to opposing counsel and prepared response to same.[.1]; Prepared email to Mr. Paronich enclosing Cricket Wireless' subpoena responses.[.1]	0.2	\$ 295.00	\$ 59.00
10/30/2019	JN	Reviewed email from Ms. Mitterndorfer enclosing link to production documents and retrieved same.[.1]	0.1	\$ 295.00	\$ 29.50
11/4/2019	JN	Troubleshooting of production load and import of same.[.3]; Prepared email to Ms. Mitterndorfer regarding problematic formatting of load file.[.1]	0.4	\$ 295.00	\$ 118.00
11/6/2019	JN	Reviewed email from Mr. Paronich enclosing subpoena response and prepared email regarding same.[.1]; Imported LandFall Data responses to subpoena into Eclipse and logged same.[.1]; Created production of latest subpoena responses.[.1]; Prepared email enclosing ShareFile link to same.[.1]	0.4	\$ 295.00	\$ 118.00
1/14/2020	JN	Personal conference regarding production log.[.1]; Updated production log to include reproduction dates and confirmed production of documents as bates stamped by TMLG.[.3]; Reviewed email regarding production from Mr. Dorf and prepared response to same.[.1]; Attended team call to discuss outstanding task list.[.1]	1.6	\$ 295.00	\$ 472.00
1/15/2020	JN	Reviewed email regarding subpoena to Little Brook Media and prepared response to same.[.1]; Applied bates stamps to new Prospects DM document for attachment to subpoena.[.1]; Prepared email inquiring about additional production documents from Prospects DM and production of same.[.1]; Reviewed email from Mr. Paronich enclosing new Prospects DM production document.[.1]; Imported Prospects DM production into Eclipse and updated production log.[.2]; Personal conference regarding additional questions about data produced by Prospects DM.[.1]; Telephone conference with Rocket Dog Care regarding preferred method for request for employment records.[.1]; Left messages for Allied Universal and Sound Mental Health requesting information about procedures for requesting employment records.[.1]	0.9	\$ 295.00	\$ 265.50
1/17/2020	JN	Attended meet and confer telephone conference regarding production of additional ESI and use of search terms.[.3]	0.3	\$ 295.00	\$ 88.50
1/29/2020	JN	Reviewed email from Mr. Paronich enclosing Prospects DM production documents and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
2/4/2020	JN	Personal conference regarding allegations that actual subpoena was not included in service package served on Littlebrook Media.[.1]	0.1	\$ 295.00	\$ 29.50
2/5/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing production documents and updated production log to include same.[.1]; Loaded documents into Eclipse.[.2]; Reviewed recent production for presence of documents regarding Mr. Swindle and prepared email regarding same.[.1]	0.4	\$ 295.00	\$ 118.00
2/5/2020	JN	Telephone conference with Mr. Hanson regarding [REDACTED].[.4]; Personal conference regarding same and state of calling records.[.2]	0.6	\$ 295.00	\$ 177.00
2/6/2020	JN	Personal conference regarding early analysis of calling data.[.2]; Conducted research on URL from which the lead originated.[.2]	0.4	\$ 295.00	\$ 118.00

Date	Timekeeper	Narrative	Units	Rate	Value
2/7/2020	JN	Reviewed Emil from Mr. Paronich regarding preparation of questions for upcoming call with Mr. Allen and response to same.[.1]; Personal conference regarding same.[.1]; Personal conference regarding third party discovery and preparation of questions regarding sources of leads and phone calls.[.7]	0.9	\$ 295.00	\$ 265.50
2/11/2020	JN	Personal conference regarding plans for further analysis of calling data and investigation of dialing system.[.2]	0.2	\$ 295.00	\$ 59.00
2/18/2020	JN	Telephone conference with Mr. Hansen regarding status of engagement letter and delivery of data.[.1]; Prepared email to Mr. Hansen enclosing ShareFile link to calling data.[.1]; Personal conference regarding gathering of documents to review in advance of deposition.[.1]	0.3	\$ 295.00	\$ 88.50
2/19/2020	JN	Created witness tags in Eclipse and tagged documents for review in advance of depositions.[.3]; Prepared email regarding same.[.1]; Left message for Mr. Hansen regarding scope of work with data.[.1]	0.5	\$ 295.00	\$ 147.50
2/19/2020	JN	Telephone conference with Mr. Hansen regarding status of scrub and findings about disposition codes.[.1]; conducted research on systems in use by Prospects DM calling center.[.9]; Prepared email summarizing call with Mr. Hansen and research on dialer systems.[.1]; Reviewed email to Mr. Paronich regarding disposition codes and dialer research.[.1]	1.2	\$ 295.00	\$ 354.00
2/20/2020	JN	Reviewed email from Mr. Paronich regarding source of Prospects DM calling data and response to same.[.1]; Personal conference regarding data analysis and dialer investigation.[.2]	0.3	\$ 295.00	\$ 88.50
2/21/2020	JN	Conducted search for and reviewed contents of logs of calls transferred to PillPack and prepared email regarding same.[.2]; Reviewed email regarding production of Anderson affidavit and prepared response to same.[.1]	0.3	\$ 295.00	\$ 88.50
2/24/2020	JN	Prepared Anderson affidavit for production and updated production log.[.1]; Imported Anderson affidavit into Eclipse.[.1]; Reviewed email from Ms. Rainwater regarding need to meet and confer over removal of redactions in transfer data and email regarding same.[.1];	0.3	\$ 295.00	\$ 88.50
2/25/2020	JN	Reviewed email from Ms. Rainwater enclosing production documents and responses to same regarding password errors.[.1]	0.1	\$ 295.00	\$ 29.50
2/26/2020	JN	Reviewed email regarding load file issues and prepared email regarding same.[.1]; Personal conference regarding relationship between Byte Success and Prospects DM.[.1]	0.2	\$ 295.00	\$ 59.00
2/27/2020	JN	Personal conference regarding Sweepstakes USA and tasks leading up to meet and confer.[.3]	0.3	\$ 295.00	\$ 88.50
2/27/2020	JN	Reviewed documents to identify bad transfers and prepared email regarding same.[.3]; Reviewed documents for additional context on sweepstakescentralusa.com research.[.3]; Reviewed email enclosing production of documents by Yodel and retrieved same.[.1]; Personal conference regarding Yodel responses and findings in bankruptcy documents.[.3]; Loaded production documents into Eclipse and logged same.[.2]	1.2	\$ 295.00	\$ 354.00
2/28/2020	JN	Imported documents produced by Yodel into Eclipse and updated privilege log.[.3]; Exported Yodel documents for production to all counsel.[.2]; Applied witness tags to new production documents.[.2]; Conducted research on NextMark and Sweepstakescentralusa.com.[.5]; Prepared email regarding same.[.1]; Imported and stamped new Yodel documents.[.3]; Exported both productions of Yodel documents for production to all counsel.[.3]; Reviewed email from Ms. Mitterndorfer enclosing production documents and retrieved same.[.1]; Imported documents produced by PillPack into Eclipse and updated production log.[.2]	2.2	\$ 295.00	\$ 649.00
3/2/2020	JN	Prepared email regarding production of Yodel subpoena responses.[.1]	0.1	\$ 295.00	\$ 29.50
3/3/2020	JN	Personal conference regarding upcoming call with Ms. Verkhovskaya.[.1]	0.1	\$ 295.00	\$ 29.50
3/4/2020	JN	Reviewed email enclosing Yodel production documents and prepared response to same.[.1]; Prepared email to all counsel enclosing documents produced by Yodel Technologies.[.1]	0.2	\$ 295.00	\$ 59.00
3/5/2020	JN	Prepared email to Ms. Peters-Stasiewicz enclosing ShareFile link to calling data for analysis.[.1]	0.1	\$ 295.00	\$ 29.50
3/5/2020	JN	Personal conference regarding additional materials to send to Mr. Hansen for review and Vici dial's avatar capabilities.[.2]; Telephone conference with Mr. Hansen regarding same.[.1]	0.3	\$ 295.00	\$ 88.50
3/5/2020	JN	Conducted online research into avatar/soundboard capabilities of Vici dial and prepared email enclosing results of same.[.3]	0.3	\$ 295.00	\$ 88.50

Date	Timekeeper	Narrative	Units	Rate	Value
4/21/2020	JN	Telephone conference regarding preparation of responsive documents for review and production in response to expert subpoenas.[.3]; Reviewed email from Mr. Hansen enclosing link to documents for production in response to subpoena and retrieved same.[.1]; Prepared same for import into Eclipse for review and production.[.2]; Reviewed email regarding production of documents uploaded by Mr. Williams and prepared response to same.[.1]; Retrieved documents uploaded by Mr. Williams and reviewed same to confirm upload of all documents intended for production.[.1]	0.8	\$ 295.00	\$ 236.00
4/21/2020	JN	Reviewed documents uploaded by plaintiff and requested redaction of same.[.1]; Imported documents produced by Mr. Hansen into pre-prod database for review and production in response to subpoena.[.4]; Prepared email regarding plans for production load and stamping.[.1]	0.6	\$ 295.00	\$ 177.00
4/21/2020	JN	Continued review and tagging of documents considered for production in response to subpoena to Mr. Hansen.[.3]; Prepared email regarding status of same.[.1]	0.4	\$ 295.00	\$ 118.00
4/21/2020	JN	Prepared documents produced by Plaintiff and loaded same into Eclipse for bates numbering.[.2]	0.2	\$ 295.00	\$ 59.00
4/22/2020	JN	Prepared email regarding status of production load.[.1]; Telephone conference regarding production of IMS files and other documents responsive to subpoenas.[.2]	0.3	\$ 295.00	\$ 88.50
4/22/2020	JN	Exported documents from Eclipse to accompany plaintiff's discovery responses.[.2]; Prepared email regarding confidentiality designations.[.1]	0.3	\$ 295.00	\$ 88.50
4/23/2020	JN	Prepared email regarding import of production load.[.1]; Telephone conference with Mr. Hansen regarding revisions to files produced in response to Mr. Payson's email.[.4]	0.5	\$ 295.00	\$ 147.50
4/23/2020	JN	Reviewed request from Mr. Payson to determine whether requests are reasonable, what documents we have or can export, and which items need to be addressed by experts.[.5]; Prepared email summarizing findings of same.[.1]; Reviewed email regarding proposed redactions of documents and prepared response to same.[.1]	0.7	\$ 295.00	\$ 206.50
4/23/2020	JN	Retrieved and reviewed files from Mr. Hansen and reviewed same for compliance with Mr. Payson's requests.[.2]; Prepared email to Mr. Hansen with question regarding same.[.1]; Conformed redaction tags and began creation of images to execute redactions of emails with experts.[.4]	0.7	\$ 295.00	\$ 206.50
4/23/2020	JN	Reviewed documents responsive to subpoenas directed to expert witnesses, applied redactions, and prepared email regarding status of same.[.1.1]; Reviewed email from Mr. Hansen regarding revised files and reviewed same.[.1]; Left message for IMS-DM customer service regarding disclosure of IMS Wireless Block Identifier files in response to subpoena.[.1]; Prepared email to Mr. Hansen regarding request for full call detail records for calls considered and identified in analysis.[.1]	1.4	\$ 295.00	\$ 413.00
4/24/2020	JN	Reviewed voice message left by Mr. Rigano regarding disclosure of IMS files in response to subpoena and left message in response to same.[.1]; Telephone conference with Mr. Rigano regarding disclosure of IMS files in subpoena responses.[.1]	0.2	\$ 295.00	\$ 59.00
4/24/2020	JN	Worked on redactions and deduplication of documents to produce in response to subpoena to Ms. Verkhovskaya.[.8]; Redacted emails responsive to subpoena to Mr. Hansen.[.1]; Telephone conference regarding redactions and duplicate documents.[.8]; Prepared email to Ms. Verkhovskaya enclosing redacted documents.[.1]; Left message for Ms. Turner regarding production of files from iConnectiv.[.1]; Imported additional documents to be produced in response to subpoena to Mr. Hansen for application of bates stamps.[.2]; Reviewed email from Mr. Rigano regarding consent to produce IMS files and prepared response to same.[.1]; Exported documents responsive to subpoena directed to Mr. Hansen.[.2]	2.4	\$ 295.00	\$ 708.00
4/24/2020	JN	Continued troubleshooting production errors and prepared separate exports to resolve file type conflicts.[.5]; Reviewed emails confirming documents were in queue for production and prepared response to same.[.1]; Prepared email to all counsel enclosing ShareFile link to Mr. Hansen's response to subpoena.[.1]; Reviewed plaintiff's objections to subpoena to Mr. Hansen and prepared email regarding same.[.1]	0.8	\$ 295.00	\$ 236.00
4/27/2020	JN	Telephone conference with Ms. Turner regarding disclosure of ported number files from iConnectiv.[.1]. Prepared additional documents from Mr. Hansen for bates stamping and production.[.4]; Telephone conference with Ms. Turner regarding inability to produce files in response to subpoena.[.1]	0.6	\$ 295.00	\$ 177.00

Date	Timekeeper	Narrative	Units	Rate	Value
4/27/2020	JN	Bates stamped and exported natives for supplemental production.[2]; Processed additional emails for production.[1]; Prepared email to all counsel enclosing link to Mr. Hansen's supplemental production of documents.[1]	0.4	\$ 295.00	\$ 118.00
4/27/2020	JN	Reviewed email from Ms. Mitterndorfer regarding problems with production documents and prepared response to same.[1]; Telephone conference with Mr. Payson regarding communications with Ms. Turner about production of ported number files.[2]; Troubleshooting issues raised by Ms. Mitterndorfer regarding load files.[1]; Exported revised productions.[9]; Prepared email to Ms. Mitterndorfer enclosing link to revised productions.[1]; Prepared email to Mr. Payson enclosing image files capturing Alteryx workflows.[1]	1.5	\$ 295.00	\$ 442.50
4/27/2020	JN	Reviewed email from Mr. Payson regarding concerns about documents produced as JPGs only and prepared response to same.[1]; Telephone conference regarding reproduction of documents per Mr. Payson's request.[1]; Prepared revised production and confirmed proper export of same.[2]; Telephone conference with Mr. Hansen regarding documents to be produced.[1]; Prepared email to all counsel enclosing link to production of native copies of workflow images.[1]	0.6	\$ 295.00	\$ 177.00
4/28/2020	JN	Reviewed email from Mr. Payson regarding request for supplementation and/or meet and confer regarding production by Hansen and prepared email regarding same.[1]; Telephone conference with Mr. Hansen regarding plans to provide additional documents requested by Mr. Payson.[4]; Telephone conference with Mr. Hansen regarding production of Alteryx workflows.[3]; Telephone conference regarding attendance of deposition of Mr. Hansen.[1]	0.9	\$ 295.00	\$ 265.50
4/28/2020	JN	Prepared email enclosing proposed production strategy for Alteryx workflow files and sample exports of same.[2]; Telephone conference regarding proposed production format for proprietary Alteryx files.[2]; Reviewed email from Mr. Hansen enclosing workflows for production.[1]; Prepared XML printouts and XML files from native YXMD files.[5]; Revised workflows to eliminate overlap obscuring tools and created images of same.[1]; Imported resulting documents into Eclipse for production.[3]; Exported bates stamped documents for production to all counsel.[2]; Prepared email to all counsel enclosing ShareFile link to same.[1]; Updated production log.[1];	2.7	\$ 295.00	\$ 796.50
4/29/2020	JN	Reviewed email from Ms. Mitterndorfer regarding numbering gap and prepared response to same.[1]	0.1	\$ 295.00	\$ 29.50
4/29/2020	JN	Conducted search documents in missing range and performed MD5 matching to confirm no reproduction is necessary.[1.2]	1.2	\$ 295.00	\$ 354.00
4/29/2020	JN	Prepared email to Ms. Mitterndorfer regarding findings regarding investigation of bates gap.[2]	0.2	\$ 295.00	\$ 59.00
4/29/2020	JN	Reviewed email from Ms. Verkhovskaya regarding Mr. Payson's requests for creation of documents and began creation of workflows to obtain same.[2]	0.2	\$ 295.00	\$ 59.00
4/29/2020	JN	Imported new productions into main Eclipse database to export for Mr. Hansen's review.[4]; Created native overlay to fix corrupt load file.[2]; Exported production documents and metadata guide for review for Mr. Hansen.[3]; Prepared email to Mr. Hansen enclosing ShareFile link to same.[1]; Worked on creation of workflows to replicate Ms. Verkhovskaya's call detail records relied upon.[3.6]	4.6	\$ 295.00	\$ 1,357.00
4/30/2020	JN	Reviewed email regarding telephone conference with Ms. Verkhovskaya regarding subpoena responses and supplemental report and prepared email regarding same.[1]; Telephone conference regarding resolution to same.[2]; Telephone conference with Ms. Peters-Stasiewicz regarding discrepancy in output files.[1]	0.4	\$ 295.00	\$ 118.00
4/30/2020	JN	Continued working to resolve issues with recreation of file requested by Mr. Payson in response to Ms. Verkhovskaya subpoena.[1.6]; Prepared email enclosing results of same.[1]	1.7	\$ 295.00	\$ 501.50
4/30/2020	JN	Telephone conference regarding concerns of file erroneously excluded from analysis.[2]	0.2	\$ 295.00	\$ 59.00
5/1/2020	JN	Attended deposition of Mr. Hansen.[6.8]; Telephone conference with Ms. Verkhovskaya regarding file to be produced in connection with Nexxa Input.[1]; Imported documents produced by Ms. Verkhovskaya into Eclipse for bates stamping and production.[2]; Telephone conference regarding responses and objections to serve on all counsel.[1]; Exported all documents responsive to Ms. Verkhovskaya's subpoena and uploaded same to ShareFile.[4]; Prepared email to all counsel enclosing link to documents responsive to subpoena.[1]; Worked on revisions to scrub using date filters.[4]	8.1	\$ 295.00	\$ 2,389.50

Date	Timekeeper	Narrative	Units	Rate	Value
5/3/2020	JN	Reviewed email regarding production of emails submitted by Mr. Smith and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
		Telephone conference regarding production of expert report.[.1]; Reviewed email from Ms. Peters-Stasiewicz enclosing expert report and prepared email to all counsel enclosing copies of same.[.1]; Reviewed email regarding problematic language in printed Gmail emails and responses to same.[.1]; Reviewed emails to determine if chains could be easily reconstructed by opposing counsel.[.2]; Telephone conference regarding proposed resolution of Gmail issues.[.1]; Prepared email regarding alternative production format and reviewed response to same.[.1]; Prepared email to Mr. Paronich enclosing instructions for export of MBOX file from Gmail account.[.2]; Imported first round of documents produced by Ms. Peters-Stasiewicz into Eclipse.[.2]; Prepared export of documents to be included in supplemental production for Ms. Verkhovskaya.[.2]; Prepared email regarding redaction of documents in line for production and reviewed response to same.[.1]; Exported large data files from main Eclipse database as backups for removal and reindexing of large files.[.2]; Telephone conference regarding production of counsel's emails and removal of duplicative files.[.1]; Prepared email to all counsel enclosing link to supplemental production of Ms. Verkhovskaya.[.1]; Worked on identification and removal of large data files from database to improve performance.[.3]; Imported additional documents produced by Ms. Peters-Stasiewicz.[.2]	2.3	\$ 295.00	\$ 678.50
5/3/2020	JN	Exported Ms. Verkhovskaya's complete supplemental production of documents and documents being reproduced in unredacted form.[.4]	0.4	\$ 295.00	\$ 118.00
		Telephone conference regarding production status and discussion with Ms. Verkhovskaya.[.2]; Continued working to join data from Ms. Verkhovskaya.[.2.9]; Telephone conference with Ms. Verkhovskaya regarding inability to join due to problematic time field.[.3]; Prepared email regarding outstanding request for file from Ms. Verkhovskaya and timeline of production of documents.[.1]; Updated production log to reflect expert production.[.1]	3.6	\$ 295.00	\$ 1,062.00
5/4/2020	JN	Telephone conference regarding business scrub and problems with joining of data for production.[.3]	0.3	\$ 295.00	\$ 88.50
		Reviewed email from Ms. Verkhovskaya regarding upload of requested file and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
5/5/2020	JN	Completed joining of NDNCR output with file produced by Ms. Verkhovskaya.[.2.4]	2.4	\$ 295.00	\$ 708.00
		Imported documents into Eclipse for stamping and production.[.1] Exported production file from Eclipse and prepared email regarding delivery of same.[.3]; Compiled exhibits to deposition of Mr. Hansen and prepared same for delivery in advance of Ms. Verkhovskaya's deposition.[.2]; Uploaded production documents to ShareFile and prepared email to all counsel enclosing link to same.[.1]	0.7	\$ 295.00	\$ 206.50
5/5/2020	JN	Reviewed email from Ms. Rainwater regarding deficiencies in Ms. Verkhovskaya's production of documents responsive to subpoena.[.1]	0.1	\$ 295.00	\$ 29.50
		Reviewed email from Ms. Rainwater regarding production deficiencies and emails regarding same.[.1]; Reviewed email from Mr. Smith regarding response to Mr. Payson's letter regarding discovery deficiencies and responses to same.[.1]; Reviewed documents produced on behalf of Ms. Verkhovskaya to determine whether new documents are sufficient to cure issues raised by Ms. Rainwater and determine whether documents were over redacted.[.3]; Prepared email regarding assessment of same.[.1]; Telephone conference regarding issues to raise in upcoming call with Ms. Verkhovskaya.[.2]	0.8	\$ 295.00	\$ 236.00
5/11/2020	JN	Reviewed email from Mr. Smith regarding issues to discuss about discovery deficiencies identified by Mr. Payson and prepared response to same.[.1]; Reviewed production documents and correspondence regarding same to confirm production of documents sought by Mr. Payson.[.4]; updated production log and investigated reused bates numbers.[.2]	0.7	\$ 295.00	\$ 206.50
		Reviewed email regarding production of correspondence with Mr. Allen and Mr. Dorf and creation of pre-prod database for review of same.[.1]; Imported emails into Eclipse pre-prod database.[.2]	0.3	\$ 295.00	\$ 88.50
5/12/2020	JN	Worked on expert production issues[.4]; Created workflow to determine date ranges of all calling data and date limitations proposed during deposition of Mr. Hansen.[.2]; Prepared email regarding same.[.1]	0.7	\$ 295.00	\$ 206.50

Date	Timekeeper	Narrative	Units	Rate	Value
5/12/2020	JN	Reviewed email requesting number of calls within date range erroneously included in request submitted to Ms. Verkhovskaya and prepared response to same.[.1]; Reviewed calling records and developed workflow to isolate calls within date range outside of that provided to Ms. Verkhovskaya and to identify portion of NDNCR violations those calls include.[.6];	0.7	\$ 295.00	\$ 206.50
5/12/2020	JN	Telephone conference regarding concerns about date ranges given to Ms. Verkhovskaya.[.1]	0.1	\$ 295.00	\$ 29.50
5/12/2020	JN	Created workflow to aid in troubleshooting data range issue. [1.1]; Imported emails sent by Mr. Paronich for review and production into Eclipse.[.3]; Telephone conference regarding same.[.1]; Imported SQL code produced by Ms. Verkhovskaya into Eclipse for bates labeling.[.2]; Prepared email regarding status of additional files to be uploaded to SFTP server.[.1]; Exported supplemental production for Ms. Verkhovskaya and uploaded same to ShareFile.[.2]	2	\$ 295.00	\$ 590.00
5/12/2020	JN	Imported new documents produced by Ms. Verkhovskaya, applied bates stamps, and exported production of same.[.3]; Telephone conference regarding production status and explanation of creation of spreadsheets for use in business scrub.[.1]; Prepared email to Ms. Verkhovskaya explaining creation of spreadsheets containing phone numbers for calls outside of date range.[.1]	0.5	\$ 295.00	\$ 147.50
5/13/2020	JN	Imported emails concerning subpoena responses into pre-prod database and set up tags for review.[.4]; Analyzed email production issues[.5]; Reviewed email from Ms. Peters-Stasiewicz enclosing supplemental report and response to same.[.1]; Prepared email to all counsel enclosing Ms. Verkhovskaya's supplemental report and exhibits.[.1]; Reviewed email from Ms. Peters-Stasiewicz regarding upload of remaining responsive files to SFTP site and retrieved same.[.1]; Telephone conference regarding plans for production of documents and problematic redacted versions of documents provided.[.2]; Prepared email to Mr. Paronich enclosing instructions for Gmail export.[.1]; Imported new documents from CEG into pre-prod database for bates stamping and exported production.[.4]; Prepared email to all counsel enclosing supplemental production of documents responsive to Ms. Verkhovskaya's subpoena.[.1]; Worked on data analysis to combine all calls considered by Ms. Verkhovskaya, total universe of calls not considered and whether, or not calls were on NDNCR output to identify dates to be used for re-scrub of same.[1.3]; Prepared email regarding status of same same.[.1]; Exported lists of numbers requested by Ms. Verkhovskaya and prepared email enclosing same.[.2]	3.6	\$ 295.00	\$ 1,062.00
5/14/2020	JN	Created overlay load file to aid in removal of large data files.[.2]	0.2	\$ 295.00	\$ 59.00
5/14/2020	JN	Reviewed email from Mr. Payson regarding upcoming depositions.[.1]; Reviewed email from Ms. Mitterndorfer regarding missing image and prepared email enclosing same.[.1]; Investigated image missing from production and exported document with missing image.[.2]	0.4	\$ 295.00	\$ 118.00
5/15/2020	JN	Reviewed email from Mr. Paronich regarding Gmail export and prepared response to same.[.1]; Reviewed email regarding production of additional document from Ms. Verkhovskaya and prepared response to same.[.1]	0.2	\$ 295.00	\$ 59.00
5/15/2020	JN	Imported new document from Ms. Verkhovskaya into Eclipse for bates stamping and production.[.2]; Reviewed email from Ms. Mitterndorfer regarding additional images missing from production and prepared response to same.[.1]; Exported documents with missing images.[.3]; Prepared email to Ms. Mitterndorfer enclosing missing images.[.1]; Exported supplemental production of Ms. Verkhovskaya.[.2]; Prepared email to all counsel enclosing same.[.1]; Prepared email regarding production of Mr. Paronich's emails and reviewed response to same.[.1]; Telephone conference regarding processing of additional emails.[.1]; Imported additional emails from co-counsel for review and production.[.2]	1.4	\$ 295.00	\$ 413.00
5/15/2020	JN	Reviewed emails enclosing additional emails to be loaded in to pre-prod database for review and production and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50

Date	Timekeeper	Narrative	Units	Rate	Value
5/18/2020	JN	Worked on import of productions for creation of PDF export.[.5]; Prepared PDF export of Ms. Verkhovskaya's productions.[.2]; Personal conference regarding status of document review and preparation for depositions.[.2]; Prepared email to Mr. Paronich enclosing ShareFile link to PDF production of Verkhovskaya production documents.[.1]; Reviewed email from Mr. Paronich enclosing additional recording produced by Prospects DM and prepared response to same.[.1]; Updated production log.[.1]	1.2	\$ 295.00	\$ 354.00
5/19/2020	JN	Reviewed PDF production documents to reference files to address with Ms. Verkhovskaya and substituted missing natives and load file.[.3]; Prepared email to Ms. Verkhovskaya enclosing same.[.1]; Reviewed email from Ms. Peters-Staciwicz regarding contents of file from ShareFile link and prepared response to same.[.1];	0.5	\$ 295.00	\$ 147.50
5/21/2020	JN	Reviewed emails regarding failure to produce Trusted Form documents and responses to same.[.1]	0.1	\$ 295.00	\$ 29.50
5/26/2020	JN	Reviewed email regarding production of documents for supplemental production and prepared response to same.[.1]; Telephone conference regarding production of emails and preparation of chart regarding same.[.2]	0.3	\$ 295.00	\$ 88.50
5/26/2020	JN	Split and imported documents to be included in production into eclipse.[.2]	0.2	\$ 295.00	\$ 59.00
5/26/2020	JN	Applied tags to newly imported documents and exported all emails for inclusion in supplemental production.[.3]	0.3	\$ 295.00	\$ 88.50
5/26/2020	JN	Prepared load file export of communications regarding subpoenas for creation of chart about same.[.1]	0.1	\$ 295.00	\$ 29.50
5/27/2020	JN	Identified subpoenas referenced in emails in subpoena correspondence chart.[.4]; Prepared new production of subpoena correspondence to remove Exploria email erroneously included.[.3]; Prepared Alteryx workflow to substitute revised bates numbers and divide entries according to subpoena.[.3]; Reviewed email regarding files to be uploaded by Mr. Williams and prepared response to same.[.1]; Reviewed email from Mr. Smith regarding upload of documents and prepared response to same.[.1]; Reviewed email regarding need for proof of ownership of telephone number and prepared response to same.[.1]	1.3	\$ 295.00	\$ 383.50
5/28/2020	JN	Reviewed subpoena and subpoena responses to determine if subscriber information was requested and locate point of contact.[.2]; Telephone conference with AT&T subpoena compliance department regarding need for new subpoena concerning subscriber information.[.1]; Prepared email regarding plans for reissuing subpoena to AT&T.[.1]; Reviewed email from Mr. Smith regarding consent form for revised subpoena and prepared response to same.[.1]; Prepared notice of intent to serve subpoena.[.1]; Prepared form subpoena to Cricket Wireless.[.1]; Prepared transmittal letter and declaration of records custodian regarding subpoena to Cricket Wireless.[.1]; Reviewed email regarding options for remote notary and prepared response to same.[.1]; Personal conference regarding production of native emails to cure issues with missing attachments and truncated messages.[.1]; Reviewed email enclosing link to AT&T site regarding consumer consent and prepared response to same.[.1]; Prepared email to Mr. Paronich regarding email export.[.1]; Reviewed email from Mr. Smith enclosing executed consent to accompany subpoena and prepared response to same.[.1]	1.3	\$ 295.00	\$ 383.50
5/28/2020	JN	Finalized Cricket subpoena package and email enclosing same for review.[.2]; Prepared email to all counsel enclosing same.[.1]	0.3	\$ 295.00	\$ 88.50
5/29/2020	JN	Reviewed emails regarding [REDACTED] and prepared response to same.[.1]; Retrieved [REDACTED].[.1]; Prepared email regarding non-appearance of same.[.1]; Reviewed email enclosing Yodel data and reviewed data [REDACTED].[.2]; Reviewed email regarding "bad transfers" isolated to Performance Media and prepared response to same.[.1]; Conducted search of production documents for [REDACTED].[.1]	0.7	\$ 295.00	\$ 206.50
5/29/2020	JN	Revised subpoena correspondence and production chart and updated same to include production data.[.3]; Prepared email regarding production issues.[.1]; Reviewed email regarding [REDACTED] and prepared response to same.[.1]	1.5	\$ 295.00	\$ 442.50

Date	Timekeeper	Narrative	Units	Rate	Value
5/29/2020	JN	Reviewed email regarding [REDACTED] and prepared responses to same.[.1]; Conducted search of production documents for [REDACTED].[.3]	0.3	\$ 295.00	\$ 88.50
6/1/2020	JN	Reviewed email regarding [REDACTED].[.1]; Reviewed email from Mr. Paronich regarding [REDACTED] and prepared response to same.[.1]	0.2	\$ 295.00	\$ 59.00
6/2/2020	JN	Reviewed email regarding number of violative calls placed in 2018 and prepared response to same.[.1]; Reviewed email from Ms. Mitterdorfer enclosing expert reports and response to same.[.1] Reviewed email from Mr. Paronich regarding upload of responsive emails and retrieved same from ShareFile.[.1]; ; Created workflow to determine whether any PillPack transfers took place in July 2018.[.3]	0.6	\$ 295.00	\$ 177.00
6/2/2020	JN	Extracted expert reports and prepared ShareFile link containing same.[.2]; Prepared email to Ms. Verkhovskaya enclosing ShareFile link to expert reports to be considered for rebuttal report.[.1]; Prepared email to Mr. Hansen enclosing ShareFile link to expert reports to be considered for rebuttal report.[.1]; Reviewed email from Mr. Hansen regarding request for copy of deposition transcript and prepared email regarding same.[.1]	0.5	\$ 295.00	\$ 147.50
6/2/2020	JN	Analyzed violation calls to determine which occurred in July 2018 and the size of overlap between classes.[.9]; Prepared email regarding same.[.1]	1	\$ 295.00	\$ 295.00
6/2/2020	JN	Reviewed email regarding revision of flow for date range and prepared response to same.[.1]; Revised flow and ensured no transfer calls included.[.2]	0.3	\$ 295.00	\$ 88.50
6/4/2020	JN	Reviewed email regarding date ranges in calling data and prepared response to same.[.1]; Reviewed email regarding request for upload of calling data produced by Prospects and prepared response to same.[.1]; Imported Mr. Paronich's emails into pre-prod database for review and production.[.2]	0.4	\$ 295.00	\$ 118.00
6/5/2020	JN	Prepared email regarding loading and review of emails produced by Mr. Paronich.[.1].	0.1	\$ 295.00	\$ 29.50
6/5/2020	JN	Assisted with production of Paronich correspondence with third parties.	2.5	\$ 295.00	\$ 737.50
6/8/2020	JN	Reviewed email from Mr. Paronich regarding processing of emails and prepared response to same.[.1]; Reviewed email from Mr. Paronich regarding export format and prepared response to same.[.1]	0.2	\$ 295.00	\$ 59.00
6/9/2020	JN	Reviewed email from Mr. Paronich regarding filing of subpoena enforcement action and prepared response to same.[.1]; Reviewed email from Mr. Paronich regarding upload of responsive emails and prepared response to same.[.1]; Retrieved files from ShareFile and imported same into Eclipse for review and production.[.3]; Prepared email regarding lack of signature on verification page.[.1]; Converted native emails to images for redaction.[.1]	0.7	\$ 295.00	\$ 206.50
6/9/2020	JN	Reviewed and deduplicated emails to be produced with supplemental discovery responses.[2.5]; Prepared email enclosing list of all third parties that counsel contacted regarding subpoena compliance[.1]	2.6	\$ 295.00	\$ 767.00
6/10/2020	JN	Reviewed email regarding [REDACTED].[.1]; Loaded Mr. Williams documents into pre-prod database for production.[.2]; Telephone conference regarding same.[.2]; Reviewed email regarding additional analysis to be performed by Mr. Hansen and prepared response to same.[.1]; Refined workflow and exported requested data.[.3]; Reviewed email regarding additional data points and revised workflow to include same.[1.1]	2	\$ 295.00	\$ 590.00

Date	Timekeeper	Narrative	Units	Rate	Value
6/11/2020	JN	Reviewed email from Ms. Mitterndorfer regarding failure to produce natives in Yodel production and prepared response enclosing same.[.1]; Exported missing natives from Yodel production and uploaded same to Sharefile.[.2]; Reviewed documents marked for production for necessary redactions/removal of Exploria documents and prepared email regarding same.[.2]; Applied redactions and exported production from Eclipse.[.4]; Imported Prospects DM recording into Eclipse for production.[.1]; Updated production log.[.1]; Exported Prospects production and uploaded files to ShareFile.[.2]; Prepared email to all counsel enclosing link to production documents.[.1]; Finalized discovery responses and prepared email enclosing same for review[.1]; Reviewed prior analysis of records and modified same to respond to issues raised in request for additional analysis for Mr. Hansen's report.[.9]; Prepared email enclosing results and concerns about same.[.1]; Reviewed email from Mr. Hansen enclosing draft rebuttal report.[.1]; Telephone conference regarding Mr. Hansen's rebuttal report and points addressed by Ms. Smith and plans for outlining same.[.2]; Reviewed Mr. Hansen's rebuttal report.[.1]	2.9	\$ 295.00	\$ 855.50
6/12/2020	JN	Reviewed email from Ms. Verkhovskaya enclosing language for rebuttal report.[.1]; Reviewed email from Mr. Smith regarding discussion of results of analysis and prepared response to same.[.1]	0.2	\$ 295.00	\$ 59.00
6/12/2020	JN	Reviewed Mr. Hansen's deposition transcript for discussion of PillPack transfer records.[.3]	0.3	\$ 295.00	\$ 88.50
6/12/2020	JN	Telephone conference with Mr. Smith regarding data analysis and additional points of interest.[.4]; Began analysis of points raised by Mr. Smith.[.2]	0.6	\$ 295.00	\$ 177.00
6/12/2020	JN	Reviewed email from Mr. Smith regarding [REDACTED] and prepared response to same.[.1]; Telephone conference regarding revisions to Mr. Hansen's report and internal analysis.[.3]	0.4	\$ 295.00	\$ 118.00
6/15/2020	JN	Reviewed email regarding receipt of Cricket's subpoena responses and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
6/15/2020	JN	Reviewed Ms. Smith's report for issues to address through further analysis and supplemental report.[.3]; Worked on revised scrub and deduplication of call data.[4.5]; Prepared email to Mr. Hansen regarding rebuttal report and discussion of revisions to same.[.1]	4.9	\$ 295.00	\$ 1,445.50
6/15/2020	JN	Telephone conference regarding revisions to rebuttal reports.[1.2]	1.2	\$ 295.00	\$ 354.00
6/16/2020	JN	Reviewed email from Mr. Hansen regarding discussion about rebuttal report and prepared response to same.[.1]; Reviewed email regarding status of revisions to report and prepared response to same.[.1]; Telephone conference with Ms. Peters-Staciwicz regarding same.[.1]; Further telephone conference with Ms. Peters-Staciwicz regarding expert report revisions.[.1]	0.4	\$ 295.00	\$ 118.00
6/16/2020	JN	Telephone conference regarding expert report.[.4]; Further telephone conference with Mr. Hansen regarding concerns about report and revisions to analysis.[2]; Reviewed Ms. Smith's report alongside Mr. Hansen's proposed rebuttal to determine areas to expand upon.[1.1]; Reviewed workflows and prepared proposed workflow to deduplicate datasets.[1.8]	5.3	\$ 295.00	\$ 1,563.50
6/16/2020	JN	Completed revisions to deduplication flows and prepared annotations at Mr. Hansen's instruction.[3.7]; Prepared email enclosing same for review and discussion.[.1]	3.8	\$ 295.00	\$ 1,121.00
6/17/2020	JN	Assisted expert with data analysis.	3.6	\$ 295.00	\$ 1,062.00
6/17/2020	JN	Telephone conference with Mr. Hansen regarding revisions to flow, isolation of issues in audit file, and plans for addressing same in rebuttal report.[1]	1	\$ 295.00	\$ 295.00
6/17/2020	JN	Continued to work with expert on data analysis and troubleshooting for expert report.	3.8	\$ 295.00	\$ 1,121.00
6/18/2020	JN	Telephone conference regarding status of data analysis and additional sections of report to be drafted.[.3]; Telephone conferences with Mr. Hansen regarding additional analysis to be completed and troubleshooting of workflows/audit files to address conflicting output.[4.6]	4.9	\$ 295.00	\$ 1,445.50
6/18/2020	JN	Continued review of defendant's expert reports and proposed revisions to same.[.7]	0.7	\$ 295.00	\$ 206.50
6/18/2020	JN	Telephone conference with Mr. Hansen regarding expert rebuttal report.[1.9]; Reviewed email regarding update on draft and data analysis and prepared response to same.[.3]; Continued analysis of discrete issues to be addressed in rebuttal concerning data to ensure language is accurate.[.9]; Reviewed and proposed revisions to Mr. Hansen's rebuttal report.[3.7].	6.8	\$ 295.00	\$ 2,006.00
6/19/2020	JN	Assisted Mr. Hansen with data analysis and troubleshooting for expert report.	4.5	\$ 295.00	\$ 1,327.50

Date	Timekeeper	Narrative	Units	Rate	Value
6/19/2020	JN	Reviewed email regarding expert rebuttal report and prepared response to same.[.1]; Reviewed deposition of Mr. Hansen [REDACTED].[.2]	0.3	\$ 295.00	\$ 88.50
6/19/2020	JN	Telephone conference regarding final review of Mr. Hansen's report.[.1]; Updated citations in expert report.[.1]; telephone conference with Mr. Hansen regarding expert report.[.3]; Created deposition exhibits and applied highlighting same.[.5]; Reviewed email enclosing output for review and prepared response to same.[.1]; Reviewed Ms. Verkhovskaya's report and output for consistency.[.1]	1.2	\$ 295.00	\$ 354.00
6/22/2020	JN	Reviewed email from Mr. Hansen regarding final report and prepared response to same.[.1]; Imported Cricket Wireless' subpoena responses into Eclipse and updated production log.[.2]; Exported production of Cricket Wireless subpoena responses and reviewed same for missing images.[.3]; Prepared email to all counsel enclosing same.[.1]	0.7	\$ 295.00	\$ 206.50
6/26/2020	JN	Reviewed email from Ms. Peters-Stasiewicz enclosing output files relied upon in rebuttal report.[.1]	0.1	\$ 295.00	\$ 29.50
6/29/2020	JN	Reviewed email from Mr. Paronich enclosing ShareCare's response to subpoena and decrypted same.[.1]; Imported ShareCare's subpoena response into Eclipse and updated production log.[.3]	0.4	\$ 295.00	\$ 118.00
7/1/2020	JN	Reviewed email regarding status of production of ShareCare subpoena responses and prepared response to same.[.1]; Labeled and exported ShareCare production from Eclipse and updated production log.[.2]; Prepared email to all counsel enclosing ShareCare subpoena responses.[.1]	0.4	\$ 295.00	\$ 118.00
7/8/2020	JN	Reviewed email from Mr. Paronich regarding Yodel subpoena and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
7/8/2020	JN	Prepared email to Mr. Paronich enclosing ShareFile link to Yodel subpoena responses.[.1]	0.1	\$ 295.00	\$ 29.50
7/15/2020	JN	Reviewed email from Ms. Mitterdorfer enclosing link to production documents and retrieved same from Dropbox.[.1]	0.1	\$ 295.00	\$ 29.50
7/15/2020	JN	Prepared email regarding contents of new production.[.1]; Imported latest production documents and updated production log.[.3]; Reviewed production documents for presence of call records and DNC lists and prepared email regarding same.[.2]	0.6	\$ 295.00	\$ 177.00
7/16/2020	JN	Reviewed email regarding [REDACTED].[.1]; Prepared Alteryx workflow to isolate same in expert production files.[.2]; Prepare email enclosing results of same.[.1]; Reviewed email regarding [REDACTED].[.1]; revised cleanup workflow to [REDACTED].[.1]	0.6	\$ 295.00	\$ 177.00
7/17/2020	JN	Reviewed email to Ms. Verkhovskaya enclosing subpoenas to vendors.[.1]	0.1	\$ 295.00	\$ 29.50
7/20/2020	JN	Reviewed email from Ms. Verkhovskaya regarding [REDACTED].[.1]; Reviewed email from Ms. Mitterdorfer enclosing errata sheets for depositions.[.1]; Reviewed email regarding status of production loads and prepared response to same.[.1]; Compiled list of outstanding productions to be loaded and migrated files for same.[.3]	0.6	\$ 295.00	\$ 177.00
7/20/2020	JN	Loaded recent productions into Eclipse.[.4]	0.4	\$ 295.00	\$ 118.00
7/21/2020	JN	Prepared email regarding status of production loads.[.1]	0.1	\$ 295.00	\$ 29.50
7/21/2020	JN	Telephone conference with Mr. Smith regarding creation of privilege log.[.1]	0.1	\$ 295.00	\$ 29.50
7/21/2020	JN	Telephone conference regarding data analysis and research on [REDACTED].[.1]; Conducted initial research and compiled information regarding same for further research.[.4]; Revised alteryx workflow to compare [REDACTED] and prepared emails enclosing findings of same.[.8]	1.3	\$ 295.00	\$ 383.50
7/21/2020	JN	Compared Yodel calling data against expert outputs and prepare email summary regarding same.[.5]; Telephone conference regarding additional analysis of Yodel data.[.1]	0.6	\$ 295.00	\$ 177.00
7/22/2020	JN	Reviewed draft brief to identify cited exhibits and deposition testimony and noted confidentiality designations for same.[.2]; Telephone conference regarding confidentiality designations and recent data analysis.[.3]	2.3	\$ 295.00	\$ 678.50

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7/22/2020	JN	Reviewed email from Mr. Smith regarding status of production of documents from Mr. Williams and prepared response to same.[.1]; Reviewed plaintiff's prior productions to determine what documents were previously produced.[.1]; Reviewed email enclosing latest draft of motion for class certification and prepared response to same.[.1]; Reviewed email from Mr. Smith regarding [REDACTED] and prepared response to same.[.1]; Compared [REDACTED]	0.6	\$ 295.00	\$ 177.00
7/22/2020	JN	Reviewed brief prepped meet and confer notes	1.3	\$ 295.00	\$ 383.50
7/23/2020	JN	Drafted declaration in support of motion for class certification and annotated same regarding concerns about exhibits.[1.9]; Reviewed email from Mr. Paronich enclosing new emails produced by Mr. Hayes and prepared response to same.[.1]; Telephone conference regarding draft declaration and [REDACTED].[.1]	2.1	\$ 295.00	\$ 619.50
7/24/2020	JN	Reviewed email from Ms. Mitterdorfer enclosing production documents and retrieved same.[.1]; Loaded latest production documents into Eclipse.[.2]; Reviewed email enclosing d/b/a registrations for prospects dm.[.1]	0.4	\$ 295.00	\$ 118.00
7/24/2020	JN	Telephone conferences regarding revisions to brief and consent evidence.[.2]; Reviewed ShareCare production and analyzed issues regarding same.[.2]	0.4	\$ 295.00	\$ 118.00
7/30/2020	JN	Reviewed email from Ms. Rainwater regarding missing exhibits and prepared exhibit to be sent in response to same.[.1]	0.1	\$ 295.00	\$ 29.50
7/31/2020	JN	Reviewed emails regarding service of subpoena on Mr. Castro.[.1]; Reviewed email from Mr. Priolo regarding necessary participants for upcoming meet and confer call.[.1]	0.2	\$ 295.00	\$ 59.00
8/3/2020	JN	Reviewed email enclosing letter from Mr. Payson regarding discovery deficiencies and prepared response to same.[.1]; Reviewed email from Mr. Paronich regarding request for document referencing Mr. Castro and prepared response to same.[.1]	0.2	\$ 295.00	\$ 59.00
8/3/2020	JN	Reviewed documents produced pertaining to Mr. Castro and exported same for Mr. Paronich.[.2]; Reviewed email regarding inability to serve Mr. Castro with subpoena and prepared response to same.[.1]; Reviewed email from Mr. Smith regarding preparation of production log.[.1]; Conducted online research on other businesses and addresses at which Mr. Castro can be served.[1.2]	1.6	\$ 295.00	\$ 472.00
8/3/2020	JN	Worked on privilege log.[.4]	0.4	\$ 295.00	\$ 118.00
8/4/2020	JN	Reviewed email from Ms. Rainwater regarding proposed redactions and response to motion to seal.[.1]; Reviewed documents filed under seal and correspondence prior to filing of exhibits to address concerns raised in Ms. Rainwater's emails and prepared email regarding same.[.2]; Reviewed letter from Mr. Payson regarding discovery deficiencies and prepared email enclosing interpretation of same.[.1]	0.4	\$ 295.00	\$ 118.00
8/4/2020	JN	Reviewed documents for duplicates to identify documents for inclusion on privilege log.[.6]; Converted load files for comparison to privileged documents withheld/redacted from recent productions to create privilege log.[.1]; Telephone conference regarding same.[.1]	1.7	\$ 295.00	\$ 501.50
8/4/2020	JN	Reviewed email enclosing ShareCare's supplemental responses to subpoena and prepared response to same.[.1]; Imported supplemental production into Eclipse for bates stamping and production of same.[.3]; Exported production from Eclipse and reviewed same for errors.[.2]; Prepared email to all counsel enclosing ShareFile's supplemental responses to subpoena.[.1]	0.7	\$ 295.00	\$ 206.50
8/6/2020	JN	Reviewed email from Ms. Kardesian regarding spreadsheets accompanying exhibits to Seastrand deposition and prepared response to same.[.1]; Reviewed transcript and production documents to identify spreadsheets and submit same to court reporter.[.2]	0.3	\$ 295.00	\$ 88.50
8/7/2020	JN	Reviewed load status of recent productions and corrected load file issue with ShareCare production.[.2]	0.2	\$ 295.00	\$ 59.00
8/7/2020	JN	Telephone conference with Mr. Smith regarding upcoming production and submission of privilege log.[.1]	0.1	\$ 295.00	\$ 29.50

Date	Timekeeper	Narrative	Units	Rate	Value
8/7/2020	JN	Imported documents into Eclipse for bates stamping and production.[.2]; Reviewed extracted natives and applied redactions to same.[.2]; Exported bates stamped documents for production and converted redacted copies for review by Mr. Smith.[.2]; Applied bates numbering to privileged documents and updated privilege log.[.3]; Updated production log.[.1]; Prepared email to Mr. Smith enclosing copies of redacted documents and draft privilege log for review in advance of production.[.1]	1.1	\$ 295.00	\$ 324.50
8/10/2020	JN	Reviewed email regarding preparation of exhibits to declaration in support of opposition to motion to stay and prepared response to same.[.1]; Confirmed confidentiality status of cited deposition testimony and created requested exhibits.[.1]; Revised exhibit to declaration and prepared email enclosing same.[.1]; Reviewed email regarding revisions to redacted documents filed with motion for class certification and prepared response to same.[.1]; Applied redactions to exhibits as specified in Ms. Rainwater's declaration and prepare email enclosing copies of same.[.3]	0.3	\$ 295.00	\$ 88.50
8/11/2020	JN	Reviewed email from Ms. Mitterndorfer regarding documents included in bates numbering overlap and prepared email regarding response to same.[.1]	0.4	\$ 295.00	\$ 118.00
8/11/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing copies of Nexxa and ShareCare's response to defendant's subpoenas and retrieved same.[.1]	0.1	\$ 295.00	\$ 29.50
8/11/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing copies of Nexxa and ShareCare's response to defendant's subpoenas and retrieved same.[.1]	0.1	\$ 295.00	\$ 29.50
8/12/2020	JN	Prepared email regarding concerns about prior production of documents.[.1]; Telephone conference regarding same.[.1]; Imported documents into Eclipse for bates stamping and exported same for production.[.4]; Prepared draft email to all counsel enclosing production documents and reviewed response to same.[.1]; Reviewed emails regarding motion to seal.[.1];	0.8	\$ 295.00	\$ 236.00
8/12/2020	JN	Imported PillPack's productions of documents produced in response to subpoenas to ShareCare and Nexxa into Eclipse.[.6]; Updated production log to include same and prepared email regarding production load status.[.1]; Reviewed documents produced in response to PillPack's subpoenas.[.2]; Prepared email to Ms. Mitterndorfer regarding replacement of problematic placeholders.[.1]	1	\$ 295.00	\$ 295.00
8/13/2020	JN	Telephone conference regarding recent productions of subpoena responses.[.2]; Imported ShareCare production into main Eclipse database.[.3]	0.5	\$ 295.00	\$ 147.50
8/14/2020	JN	Exported PDF production of Nexxa's subpoena responses and prepared email to Ms. Verkhovskaya enclosing same.[.3]	0.3	\$ 295.00	\$ 88.50
8/20/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing link to production documents and retrieved same.[.1]; Reviewed contents of production and updated production log.[.1]; Prepared email regarding potential source of calling data produced.[.1]	0.3	\$ 295.00	\$ 88.50
8/20/2020	JN	Reviewed email regarding [REDACTED] [REDACTED] [REDACTED].[.1]; Cleaned and summarized new data and revised scrub flow to analyze same.[.4]	0.5	\$ 295.00	\$ 147.50
8/21/2020	JN	Reviewed email regarding preparation of exhibits for Prospects DM deposition and prepared response to same.[.1]; Reviewed relevant documents and exported same from Eclipse.[.5]; Reviewed deposition exhibits and swapped same for production documents in deposition materials.[.3]; Prepared email to Ms. Verkhovskaya enclosing Lexis Nexis declaration.[.1]	1	\$ 295.00	\$ 295.00
8/21/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing documents produced by Lexis Nexis and retrieved same.[.1]; Reviewed new production documents and updated production log.[.2]; Reviewed email regarding summary of documents produced and prepared response to same.[.1]	0.4	\$ 295.00	\$ 118.00
8/21/2020	JN	Reviewed declaration and documents produced by LexisNexis and prepared email summary of contents of same.[.4]	0.4	\$ 295.00	\$ 118.00
8/21/2020	JN	Completed analysis of newly produced calling data and prepared email enclosing summary of same.[.8]	0.8	\$ 295.00	\$ 236.00

Date	Timekeeper	Narrative	Units	Rate	Value
8/24/2020	JN	Reviewed email regarding request for deposition transcripts and prepared response enclosing sharefile link to same.[.1]; Reviewed email from Mr. Smith enclosing statistics on new calling data and prepared email summary of scrub performed on same.[.1]; Telephone conference regarding Hebard declaration.[.1]; Reviewed email regarding ShareCare production documents attached in support of Reid declaration and prepared response to same.[.1]	0.4	\$ 295.00	\$ 118.00
8/24/2020	JN	Conducted online research regarding statements made in Ms. Hebard's declaration.[1.3]; Telephone conference regarding same.[.1]	1.6	\$ 295.00	\$ 472.00
8/25/2020	JN	Completed online research on owners of websites and prepared email enclosing results of same	2.5	\$ 295.00	\$ 737.50
8/26/2020	JN	Reviewed email regarding presence of list ID referenced in Mr. Barsky's declaration in data produced by Prospects DM and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
8/27/2020	JN	Applied new redactions to sealed copies of depositions of Ms. Ranneberg and Mr. Swindle.[.4]; Applied revised redactions to other exhibits per order at Dkt. 56.[.2]; Reviewed email regarding status of filing of documents with revised redactions and prepared email enclosing same.[.1]	0.7	\$ 295.00	\$ 206.50
8/28/2020	JN	Reviewed email regarding additional exhibits and prepared response to same.[.1]; Prepared email to Mr. Smith enclosing ShareFile link to deposition exhibits.[.1]	0.2	\$ 295.00	\$ 59.00
8/31/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing link to new production documents and retrieved same.[.1]	0.1	\$ 295.00	\$ 29.50
8/31/2020	JN	Loaded latest production into Eclipse and updated production log.[.4]	0.4	\$ 295.00	\$ 118.00
9/1/2020	JN	Created new database fields to capture data included in new load file format.[.1]; Completed load of Lexis Nexis production.[.3]; Reviewed email regarding receipt of production and prepared response to same.[.1]; Reviewed email regarding production of complete DNC data and prepared response enclosing same.[.1]; Reviewed contents of recent production by PillPack and prepared email regarding same.[.2]; Telephone conference regarding analysis of DNC data.[.1]; Reviewed email from Ms. Mitterndorfer enclosing link to new production documents and retrieved same.[.1]; Reviewed email regarding verification of statements made in supplemental declaration of Mr. Barsky and prepared response to same.[.1]; Updated production log.[.1]	1.2	\$ 295.00	\$ 354.00
9/1/2020	JN	Analyzed data in attempt to confirm statements made in declaration of Mr. Barsky.[1]	1	\$ 295.00	\$ 295.00
9/2/2020	JN	Continued working on data analysis.[1.2]; Prepared email enclosing results of same.[.1]	1.3	\$ 295.00	\$ 383.50
9/3/2020	JN	Continued review of data [REDACTED].[.1]	1	\$ 295.00	\$ 295.00
9/4/2020	JN	Telephone conference regarding findings in data and filing of reply to motion for class certification.[.2]; Reviewed email from Ms. Fairchild regarding production of documents supporting Mr. Barsky's declaration and responses to same.[.1]; Compared PillPack transfers to latest production of calling data.[.1]	0.4	\$ 295.00	\$ 118.00
9/4/2020	JN	Telephone conference regarding analysis of new data[.1]; Telephone conference regarding source of files and overlap between datasets[.2]; Reviewed email from Ms. Mitterndorfer enclosing latest production and retrieved same[.1]; Imported latest production into Eclipse and prepared email regarding same[.1]; Reviewed emails regarding stipulation concerning late produced declaration of Mr. Barsky and responses to same[.1]; Worked on data analysis for use in reply in support of motion for class certification[1.9].	2.5	\$ 295.00	\$ 737.50
9/4/2020	JN	Telephone conference regarding finalizing exhibits, declaration, and sealing status of same.[.1]; Prepared declaration in support of reply in support of motion for class certification and exhibits.[1.8];	1.9	\$ 295.00	\$ 560.50
9/4/2020	JN	Analyzed new data produced by Yodel.[.7]	0.7	\$ 295.00	\$ 206.50
9/8/2020	JN	Updated production log.[.1]; Prepared email regarding service of Yodel subpoena responses and reviewed response to same.[.1]; Imported Yodel production into Eclipse for application of bates stamps.[.2]	0.4	\$ 295.00	\$ 118.00
9/8/2020	JN	Reviewed email regarding task list and data analysis and prepared response to same.[.1]; Conducted online research to identify address for service of subpoena on Fluent, Inc. and prepared email enclosing same.[.3]	0.4	\$ 295.00	\$ 118.00
9/8/2020	JN	Telephone conference regarding data analysis and response to motion for summary judgment.[.2]	0.2	\$ 295.00	\$ 59.00
9/8/2020	JN	Worked on data analysis.[2.5]; Prepared email summarizing outcome of same.[.1]	2.6	\$ 295.00	\$ 767.00

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9/9/2020	JN	Reviewed email from Ms. Mitterndorfer regarding inability to access Yodel production and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
9/9/2020	JN	Completed analysis of consent data and prepared email enclosing results of same.[.4]	0.4	\$ 295.00	\$ 118.00
9/11/2020	JN	Reviewed email from Mr. Smith regarding issuing subpoena to CareZone.[.1]	0.1	\$ 295.00	\$ 29.50
9/14/2020	JN	Analyzed issues relating to production of third party documents[1.0].	1	\$ 295.00	\$ 295.00
9/14/2020	JN	Analyzed issues relating to production of third party documents[0.2].	0.2	\$ 295.00	\$ 59.00
9/14/2020	JN	Telephone conference regarding exhibits and necessary declarations for filing with response to late filed declaration of Mr. Barsky.[.1]	0.1	\$ 295.00	\$ 29.50
9/14/2020	JN	Drafted declaration in support of response to motion to file supplemental declaration; worked on data analysis for use in declaration; Telephone conferences regarding same.[3.7]	3.7	\$ 295.00	\$ 1,091.50
9/15/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing link to production documents and retrieved same.[.1]; Loaded latest production documents into Eclipse.[.2]; Reviewed documents for content and updated production log.[.3]; Reviewed email enclosing outline for meet and confer.[.1]; Reviewed documents relating to joint defense agreement.[.3]	1	\$ 295.00	\$ 295.00
9/15/2020	JN	Reviewed email regarding deposition subpoena to Mr. Barsky and prepared response to same.[.1]; Reviewed emails regarding addresses for service of process for Mr. Barsky and Fluent, Inc. and prepared responses to same.[.1]; Conducted additional review of Delaware and New York secretary of state filings.[.2]	0.4	\$ 295.00	\$ 118.00
9/15/2020	JN	Telephone conference regarding slack research.[.1]; Conducted online research to determine process for exports of private channels in corporate Slack account and prepared email regarding same.[.3]	0.4	\$ 295.00	\$ 118.00
9/16/2020	JN	Reviewed email regarding filtering of bad transfers file and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
9/17/2020	JN	Reviewed email regarding status of response to motion for summary judgment and response to same.[.1]	0.5	\$ 295.00	\$ 147.50
9/17/2020	JN	Identified bad transfers in Performance Media DNIS data.[.6]; Prepared email regarding same.[.1]	0.7	\$ 295.00	\$ 206.50
9/18/2020	JN	Reviewed email from Ms. Mitterndorfer enclosing link to production documents and retrieved same.[.1]; Prepared email regarding status of production processing and reviewed responses to same.[.1]; Reviewed email regarding export of PDF production for Mr. Smith and prepared response to same.[.1]; Imported documents into Eclipse and prepared email regarding status of same.[.3]; Reviewed Ms. Fairchild's declaration in support of reply.[.1]	0.7	\$ 295.00	\$ 206.50
9/18/2020	JN	Exported PDF production for Mr. Smith and prepared email enclosing same.[.3]	0.2	\$ 295.00	\$ 59.00
9/18/2020	JN	Reviewed substance of recent production to confirm no new data was produced.[.3]; Prepared email regarding concerns about broken index and reviewed responses to same.[.1]; Initiated rebuilding of index and prepared email confirming same.[.1]; Reviewed email enclosing PillPack's supplemental responses to requests for production.[.1]	0.6	\$ 295.00	\$ 177.00
9/21/2020	JN	Began review of brief for exhibits.[.2]	0.2	\$ 295.00	\$ 59.00
9/21/2020	JN	Reviewed email regarding status of response to motion for summary judgment and prepared response to same.[.1];	0.1	\$ 295.00	\$ 29.50
9/21/2020	JN	Worked on preparation of exhibits to and declaration in support of response to motion for summary judgment, declaration in support and motion to seal, telephone conferences regarding same. [10.8]	10.8	\$ 295.00	\$ 3,186.00
9/23/2020	JN	Telephone conference regarding status of Slack research and review of privilege log.[.2]; Began review of documents relating to joint defense agreement[.3]	0.5	\$ 295.00	\$ 147.50
9/24/2020	JN	Prepared message to Cincher.io support team regarding request for demonstration of Slack parsing.[.1]; Prepared email regarding review of privilege log.[.1]; Reviewed email from Mr. Esper enclosing demonstration materials and data concerning Cincher product and prepared response to same.[.1]; Reviewed materials sent by Mr. Esper.[.3]	0.6	\$ 295.00	\$ 177.00
9/29/2020	JN	Reviewed documents produced concerning Fluent "Marketing partners" and reviewed entity registrations for same.[.2]; Reviewed email regarding identification of Fluent d/b/a and prepared response to same.[.1]; Prepared email enclosing results of fictitious name search.[.1]; Telephone conference regarding same.[.2]	0.6	\$ 295.00	\$ 177.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/29/2020	JN	Conducted online research on Fluent subsidiaries.[1.7]; Reviewed email regarding service on Mr. Barsky and prepared response to same.[.1]; Conducted online research to verify Fire Island address for Mr. Barsky.[.2]; Prepared email summary of research on Fluent companies.[.1]; Retrieved and reviewed Corporate Investigator report for Fluent, Inc.[.2]; Telephone conference regarding [REDACTED].[.2]; Conducted online research [REDACTED].	2.1	\$ 295.00	\$ 619.50
9/29/2020	JN	[REDACTED].[.7]	1.1	\$ 295.00	\$ 324.50
9/29/2020	JN	Revised subpoena to Mr. Barsky and prepared email regarding arrangement for payment of witness fees for same.[.3]	0.3	\$ 295.00	\$ 88.50
9/30/2020	JN	Reviewed email regarding contact with Mr. Moynihan regarding service of subpoena on Mr. Barsky and responses to same.[.1]	0.1	\$ 295.00	\$ 29.50
10/7/2020	JN	Reviewed email regarding request for assumed name search and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
10/8/2020	JN	Prepared email to New York Corporations Division [REDACTED].[.1]	0.2	\$ 295.00	\$ 59.00
10/15/2020	JN	Reviewed email from NY Division of Corporations regarding [REDACTED].[.1]	0.1	\$ 295.00	\$ 29.50
11/6/2020	JN	Videoconference regarding data analysis.[.4]	0.4	\$ 295.00	\$ 118.00
11/9/2020	JN	Reviewed email regarding [REDACTED] a prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
11/9/2020	JN	Reviewed emails regarding [REDACTED].[.2]; Telephone conference with Mr. Smith regarding parameters for search.[.4]	0.6	\$ 295.00	\$ 177.00
11/10/2020	JN	Worked on random sampling of PillPack data for production of call recordings.[2.3]	2.3	\$ 295.00	\$ 678.50
11/10/2020	JN	Reviewed email enclosing questions about date ranges and prepared response to same.[.1]; Reviewed date ranges and tweaked duration limiters on workflow.[.8]	0.9	\$ 295.00	\$ 265.50
11/11/2020	JN	Worked on call recording identification project.[.5]	0.5	\$ 295.00	\$ 147.50
11/12/2020	JN	Completed revision to workflow to identify calls of interest.[.3]; prepared email summary of same.[.2]; Reviewed email enclosing subpoenas issued to Better Business Bureau Northwest and Nevada Utah.[.1]	0.6	\$ 295.00	\$ 177.00
11/12/2020	JN	Prepared email regarding agreement to produce recordings and reviewed responses to same.[.1]; Prepared email to all counsel enclosing list of calling records for production of call recordings.[.1]; Reviewed emails from Ms. Mitterdorfer regarding documents available through expired ShareFile link and production of complete listing of documents produced by Mr. Hansen and prepared response to same.[.1]	0.3	\$ 295.00	\$ 88.50
11/12/2020	JN	Reviewed email regarding Fluent's agreement to provide lead data for phone numbers identified in Prospects DM calling records.[.1]	0.1	\$ 295.00	\$ 29.50
11/12/2020	JN	Prepared workflow to join load files for all Hansen productions and identify production dates and volumes.[.6]; Prepared email to Ms. Mitterdorfer enclosing same.[.1]	0.7	\$ 295.00	\$ 206.50
11/20/2020	JN	Reviewed email enclosing responses to subpoena and prepared response to same.[.1]; Updated production log.[.1]; Compared sold leads data to expert output and prepared email enclosing results of same.[.4]	0.6	\$ 295.00	\$ 177.00
11/20/2020	JN	Reviewed email from Mr. Payson confirming intent to produce requested call recordings.[.1]	0.1	\$ 295.00	\$ 29.50
12/14/2020	JN	Reviewed email regarding new data produced by Fluent and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
12/14/2020	JN	Prepared email regarding receipt of recordings produced and reviewed response to same.[.1]	0.1	\$ 295.00	\$ 29.50
12/14/2020	JN	Reviewed and analyzed latest data produced by Fluent [.4]; Prepared email regarding same.[.1]; Reviewed load file for recordings produced and joined same to notes for review and determination which recordings were not produced.[.3]; Updated production log.[.1]	0.9	\$ 295.00	\$ 265.50
12/15/2020	JN	Reviewed email from Mr. Smith regarding review of recordings and response to same.[.1]; Updated recording review spreadsheet to include new notes fields and prepared email enclosing same.[.2]	0.3	\$ 295.00	\$ 88.50
12/15/2020	JN	Divided recordings into batches and prepared spreadsheets for review of same.[.4]; Prepared email enclosing instructions for review of recordings.[.1]; Reviewed email from Mr. Dietrich enclosing sample recordings and prepared response to same.[.1]	0.6	\$ 295.00	\$ 177.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/21/2020	JN	Reviewed email from Ms. Mitterndorfer regarding responses to subpoenas and prepared response to same.[.1]; Reviewed correspondence regarding recent subpoenas to determine sufficiency of responses to same.[.1]	0.2	\$ 295.00	\$ 59.00
12/21/2020	JN	Telephone conference regarding filing of supplemental brief in opposition to motion for summary judgment.[.3]	0.3	\$ 295.00	\$ 88.50
12/22/2020	JN	Reviewed Mr. Barsky's declarations and attachments to same to confirm accuracy of statements made in declaration in support of motion to supplement.[.4]; Completed draft of declaration in support of motion to supplement.[.3]	0.7	\$ 295.00	\$ 206.50
12/22/2020	JN	Reviewed email from Mr. Paronich regarding revisions to motion to supplement and responses to same.[.1]	0.1	\$ 295.00	\$ 29.50
12/22/2020	JN	Identified and labeled exhibits to declaration in support of motion to supplement.[.4]; Completed declaration of Jennifer Rust Murray in support of motion to supplement and corresponding revisions to motion.[.6]	1	\$ 295.00	\$ 295.00
12/22/2020	JN	Updated paragraph and exhibit cites in motion.[.3]; Revised declaration in support of motion to supplement.[.1]; Prepared email regarding motion to seal and reviewed response to same.[.1]; Prepared emails regarding physical filing of documents and reviewed responses to same.[.1]; Finalized exhibits and prepared flash drive for physical filing with the court.[.3]; Prepared letter to clerk enclosing flash drive of native exhibits.[.1]; Telephone conference with ABC regarding delivery of disc to court.[.1]; Prepared email regarding service list.[.1]; Reviewed email enclosing final drafts of motion to supplement and supporting documents and prepared response regarding revisions to same.[.1]	1.3	\$ 295.00	\$ 383.50
12/23/2020	JN	Reviewed email from Mr. Payson regarding withdrawal of confidentiality designations and responses regarding same.[.1]; Reviewed email from Mr. Payson regarding re-noting of motion and requirement of additional time to review recordings before withdrawing confidentiality designations.[.1]	0.2	\$ 295.00	\$ 59.00
1/14/2021	JN	Reviewed reply in support of motion to supplement and original declaration regarding representations concerning TCPA consent dates.[.1]; Prepared email regarding same.[.1]	0.2	\$ 295.00	\$ 59.00
1/14/2021	JN	Reviewed minute order regarding supplemental briefing on motion for class certification.[.1]	0.1	\$ 295.00	\$ 29.50
1/15/2021	JN	Reviewed minute order granting motion to seal.[.1]; Reviewed email regarding plans for submitting unsealed recordings to court and prepared responses to same.[.1]; Prepared unsealed exhibits for submission to court.[.1]	0.3	\$ 295.00	\$ 88.50
1/19/2021	JN	Prepared notice of filing of physical evidence.[.1]; Prepared transmittal letter for flash drive.[.1]; Prepared email enclosing instructions for submission of same to court.[.1]	0.4	\$ 295.00	\$ 118.00
1/22/2021	JN	Reviewed email regarding trial schedule and possible class member notice plan and responses to same.[.1]; Reviewed prior productions for email addresses to match with violation calls and completed joining of same.[.4]; Prepared email regarding same.[.1]	0.6	\$ 295.00	\$ 177.00
1/29/2021	JN	Telephone conference to strategize about PillPack's consent defense.[.2]	0.2	\$ 295.00	\$ 59.00
1/29/2021	JN	Consent evidence analysis.	2.9	\$ 295.00	\$ 855.50
2/1/2021	JN	Prepared email regarding preliminary findings on Yodel data and reviewed response to same.[.1]	0.1	\$ 295.00	\$ 29.50
2/1/2021	JN	Continued data analysis to address alleged consent defense[4.8];	4.8	\$ 295.00	\$ 1,416.00
2/2/2021	JN	Continued research to identify owners of websites included in Yodel consent data.[.6]	0.6	\$ 295.00	\$ 177.00
2/2/2021	JN	Reviewed email regarding comparison of expert outputs to consent data and prepared response to same.[.1];	0.1	\$ 295.00	\$ 29.50
2/3/2021	JN	Continued research on websites and ownership of same.[1.8]	1.8	\$ 295.00	\$ 531.00
2/4/2021	JN	Worked on data analysis.[3.4]; Telephone conference regarding upcoming filing and status of analysis of consent data.[.3];	3.7	\$ 295.00	\$ 1,091.50
2/11/2021	JN	Telephone conference regarding analysis and recent filing of brief addressing consent issues.[.2]	0.2	\$ 295.00	\$ 59.00
2/12/2021	JN	Reviewed PillPack's brief regarding consent.[.3]; Reviewed order granting class certification to identify data sources for revised analysis.[.4]; Email correspondence regarding next steps.[.1];	0.8	\$ 295.00	\$ 236.00
2/12/2021	JN	Telephone conference regarding impact of class certification order and plans for additional analysis and research following same.[.3]; Exported putative class list for submission to Yodel.[.1]	0.4	\$ 295.00	\$ 118.00

Date	Timekeeper	Narrative	Units	Rate	Value
2/12/2021	JN	Reviewed email from Mr. Paronich regarding preservation letter for submission to Yodel and prepared response to same.[.1]; Worked on PillPack data following class certification ruling.[.7]	0.8	\$ 295.00	\$ 236.00
2/16/2021	JN	Reviewed email regarding confidentiality of records produced by Prospects DM and prepared response to same.[.1]; Reviewed emails concerning responses to subpoenas for confidentiality designations by Prospects DM.[.1]; Telephone conference regarding settlement administration quotes and contact information produced.[.1];	0.3	\$ 295.00	\$ 88.50
2/16/2021	JN	Completed analysis of address/email data provided for class members and prepared email summarizing same.[.5]; continued research on website owners and referral rate.[2.9]	3.4	\$ 295.00	\$ 1,003.00
2/23/2021	JN	Telephone conference regarding connection of list_id field to lead sources.[.2]	0.2	\$ 295.00	\$ 59.00
2/25/2021	JN	Continued to analyze class date for notice[.8]	0.8	\$ 295.00	\$ 236.00
3/2/2021	JN	Reviewed email from Ms. Mitterndorfer regarding responses to subpoenas.[.1]; Reviewed subpoenas recently issued and prepared email enclosing summary of status of same.[.3];	0.4	\$ 295.00	\$ 118.00
3/3/2021	JN	Prepared email regarding response to Ms. Mitterndorfer and reviewed response to same.[.1]; Prepared email to Ms. Mitterndorfer regarding non-receipt of documents responsive to subpoenas.[.1]	0.2	\$ 295.00	\$ 59.00
3/8/2021	JN	Continued to analyze data for notice plan.	0.4	\$ 295.00	\$ 118.00
3/9/2021	JN	Worked on analysis of PillPack consent data.[1.4]	1.4	\$ 295.00	\$ 413.00
3/11/2021	JN	Reviewed email enclosing draft exhibits for filing of notice plan to be submitted to opposing counsel and response to same.[.1]; Reviewed email from Mr. Payson regarding data supporting notice plan and prepared email regarding same.[.1]; Exported data supporting response and prepared email enclosing same.[.2]	0.4	\$ 295.00	\$ 118.00
3/12/2021	JN	Reviewed email regarding review of data for list_id's to identify source of leads and prepared response to same.[.1]; Reviewed prior correspondence regarding analysis of data and identification of lead sources by list_id values.[.2]	0.3	\$ 295.00	\$ 88.50
3/15/2021	JN	Worked on data analysis for class identification[0.2].	0.2	\$ 295.00	\$ 59.00
3/25/2021	JN	Analyzed issues and data from Yodel subpoena response[.3].	0.3	\$ 295.00	\$ 88.50
3/29/2021	JN	Reviewed email regarding production of documents and responses from Little Brook Media and prepared response to same.[.1]; Reviewed correspondence, production log, and documents produced for evidence of production to PillPack and prepared email regarding same.[.4]; Reviewed email from Ms. Fairchild regarding supplemental production of correspondence with third parties subpoenaed and response to same.[.1]; Telephone conference regarding receipt and analysis of data from Yodel and Little Brook.[.4]; Worked on analysis of Yodel data and use of list_id fields.[3.3]; Prepared email summarizing results of same and reviewed responses to same.[.1]; Telephone conference regarding list_id's used in data.[.2]; Confirmed all list_ids included in Little Brook and Yodel data.[.2]	0.6	\$ 295.00	\$ 177.00
4/20/2021	JN	Reviewed list_ids containing Little Brook and Yodel leads and prepared email enclosing same.[.1]; Telephone conference regarding further analysis of data.[.7]; Reviewed email enclosing draft status report and prepared response to same.[.1]; Reviewed status report and revised earlier analysis of list_id values to complete missing value in same.[.3]; Telephone conference regarding same.[.1]; Reviewed email to all counsel regarding review of joint status report.[.1]	4.2	\$ 295.00	\$ 1,239.00
4/21/2021	JN	Reviewed email from Ms. Mitterndorfer enclosing link to production documents and prepared email regarding same.[.1]; Retrieved, logged, and loaded production documents into iPro.[.4]; Reviewed email from Mr. Paronich enclosing filed copies of opening pleadings in Yodel subpoena enforcement action.[.1]; Reviewed email from Mr. Payson enclosing revisions to Joint Status Report.[.1]	1.4	\$ 295.00	\$ 413.00
4/23/2021	JN	Reviewed email from Mr. Payson enclosing revisions to Joint Status Report.[.1]	0.7	\$ 295.00	\$ 206.50
4/28/2021	JN	Reviewed email enclosing link to production documents and prepared response to same.[.1]; Reviewed email regarding analysis of latest production of Yodel data and prepared response to same.[.1];	0.2	\$ 295.00	\$ 59.00

Date	Timekeeper	Narrative	Units	Rate	Value
4/28/2021	JN	Filtered Yodel's latest production of lead data [REDACTED] [REDACTED] [.3]; Prepared email regarding findings of same.[.1]; Reviewed email regarding [REDACTED] [REDACTED] [.1]	0.5	\$ 295.00	\$ 147.50
4/28/2021	JN	Video conference regarding contents of new Yodel data.[1]; Updated production log to include same.[.1];	1.2	\$ 295.00	\$ 354.00
4/30/2021	JN	Reviewed email to all counsel enclosing correspondence regarding recent productions by Yodel.[.1]	0.3	\$ 295.00	\$ 88.50
5/3/2021	JN	Telephone conference regarding various merits discovery matters.[.3]; Worked on comparison of calling data to Yodel calls[.5]	0.5	\$ 295.00	\$ 147.50
5/3/2021	JN	Worked on further cleanup of date fields causing problems in workflow; [1.1]	1.1	\$ 295.00	\$ 324.50
5/4/2021	JN	Worked on PillPack data to correct date conversion errors and identify relationship of dates in Yodel data.[1.6]	1.6	\$ 295.00	\$ 472.00
5/5/2021	JN	Reviewed email to Mr. Payson regarding response to letter concerning Fluent's joint interest and response to same.[.1]	0.1	\$ 295.00	\$ 29.50
5/6/2021	JN	Revised workflow to incorporate filter for consent dates.[.3];	0.3	\$ 295.00	\$ 88.50
5/6/2021	JN	Continued comparison of lead generation, TCPA consent dates, call dates, and URLs at issue in data.[2.6]	2.6	\$ 295.00	\$ 767.00
5/10/2021	JN	Personal conference regarding recent developments in lead generation vs. dialer records.[.5]; Video conference regarding Yodel data and impact on class definition.[1]	1.5	\$ 295.00	\$ 442.50
5/10/2021	JN	Telephone conference regarding [REDACTED] [REDACTED] [.2]; Revised workflows to compile summary chart and exported data for same.[2.9]; Reviewed email regarding [REDACTED] [REDACTED] [1]; Personal conference regarding same.[.3]	3.5	\$ 295.00	\$ 1,032.50
5/13/2021	JN	Worked on data analysis.[.];	1.5	\$ 295.00	\$ 442.50
5/14/2021	JN	Reviewed email regarding production of documents and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
5/14/2021	JN	Team call.[.2]; Worked on troubleshooting potential data issues.[.8]; Worked on analysis of list_ids and Yodel URLs.[.6]	1.6	\$ 295.00	\$ 472.00
5/14/2021	JN	Telephone conference regarding communications concerning Yodel and Little Brook data and further analysis to investigate same.[.5];	0.5	\$ 295.00	\$ 147.50
5/14/2021	JN	Reviewed documents produced by lead generators and worked on data analysis of same.[1.9]	1.9	\$ 295.00	\$ 560.50
5/14/2021	JN	Worked on data analysis.[.];	1.9	\$ 295.00	\$ 560.50
5/17/2021	JN	Reviewed email from Mr. Paronich regarding responses from Ms. Francis regarding source of leads and responses to same.[.1]; Prepared email regarding list_id sources and reviewed responses to same.[.1]; Prepared email regarding third party productions.[.1]	0.3	\$ 295.00	\$ 88.50
5/17/2021	JN	Reviewed recent correspondence enclosing third party productions to confirm forwarding of all to all counsel and noted same on PL; Prepared same for import into database for stamping and production	0.4	\$ 295.00	\$ 118.00
5/17/2021	JN	Worked on data analysis.[2.3];	2.3	\$ 295.00	\$ 678.50
5/18/2021	JN	Reviewed emails regarding various discovery matters and prepared responses to same[.2]; Uploaded Prospects DM call records and prepared email to Mr. Paronich enclosing same.[.1];	0.3	\$ 295.00	\$ 88.50
5/18/2021	JN	Prepared email enclosing responses to questions concerning list_ids and calls placed by Yodel.[.1];	0.1	\$ 295.00	\$ 29.50
5/18/2021	JN	Reviewed documents and conducted online research regarding marketing partners' lists[.7]; telephone conference regarding same.[.2]	0.9	\$ 295.00	\$ 265.50
5/18/2021	JN	Continued work on data analysis and prepared email regarding findings of same.[3.2]; Worked on review and cleanup of URLs relevant to leads and prepared email regarding same.[1.7]	4.9	\$ 295.00	\$ 1,445.50
5/20/2021	JN	Reviewed email regarding information needed for preparation of status report and responses to same.[.1];	0.1	\$ 295.00	\$ 29.50
5/24/2021	JN	Worked on IP address and URL research to identify methods of excluding leads.[1.4]	1.4	\$ 295.00	\$ 413.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/25/2021	JN	Worked on production of third party subpoena correspondence and bates stamped copies of documents produced by Little Brook Media and Yodel.[1.1]; Prepared email to all counsel enclosing link to production documents.[1];	1.2	\$ 295.00	\$ 354.00
5/25/2021	JN	Continued working on production and ingestion of replacement emails[.6]; data analysis[.6]	6.6	\$ 295.00	\$ 1,947.00
5/26/2021	JN	Reviewed documents and Ms. Spicer's affidavit to confirm accuracy of numbers represented in same; worked on production of documents.[5.3]	5.3	\$ 295.00	\$ 1,563.50
5/26/2021	JN	Telephone conference regarding Ms. Spicer's affidavit [.2]	0.2	\$ 295.00	\$ 59.00
5/26/2021	JN	Worked on data analysis for update to numbers in status report.	2.6	\$ 295.00	\$ 767.00
5/27/2021	JN	Reviewed email from Ms. Mitterdorfer regarding lack of production of Little Brook documents and reviewed production log to verify same.[.1];	0.1	\$ 295.00	\$ 29.50
5/27/2021	JN	Worked on reproduction of Little Brook documents.[1.1];	1.1	\$ 295.00	\$ 324.50
5/28/2021	JN	Reviewed email from Ms. Fairchild regarding supplementation of responses to subpoena and response to same.[.1];	0.1	\$ 295.00	\$ 29.50
6/1/2021	JN	Reviewed email from Ms. Rainwater enclosing draft status report and response to same.[.1]; Personal conference regarding revisions to draft status report.[.1]	0.2	\$ 295.00	\$ 59.00
6/1/2021	JN	Pulled exhibits to joint status report; reviewed report and prepared email regarding concerns with same; reviewed data to confirm	1.8	\$ 295.00	\$ 531.00
6/2/2021	JN	Worked on URL analysis.[.2]	0.2	\$ 295.00	\$ 59.00
6/2/2021	JN	Reviewed email and enclosed copies of response to motion to compel and prepared email regarding same.[.4]; Continued working on research data.[2.8]	3.2	\$ 295.00	\$ 944.00
6/7/2021	JN	Reviewed email regarding Little Brook URLs.[.1]	0.1	\$ 295.00	\$ 29.50
6/7/2021	JN	Call re task list[.4]	0.4	\$ 295.00	\$ 118.00
6/7/2021	JN	Worked on data analysis.[.4];	4	\$ 295.00	\$ 1,180.00
6/10/2021	JN	Worked on data and flows[4]	4	\$ 295.00	\$ 1,180.00
6/14/2021	JN	Prepared summary of data and outlined problems with results.[.4]; Worked on data issues.[.4]	0.8	\$ 295.00	\$ 236.00
6/14/2021	JN	Worked on data issues and reviewed correspondence regarding same[.5];	1.2	\$ 295.00	\$ 354.00
6/17/2021	JN	Telephone conference regarding upcoming production of data responsive to subpoena to Yodel[.3]	0.3	\$ 295.00	\$ 88.50
6/21/2021	JN	Reviewed email from Mr. Smith regarding privilege log and prepared response to same; worked on conversion of same;	0.2	\$ 295.00	\$ 59.00
6/21/2021	JN	Worked on PillPack production processing.[.8]	0.8	\$ 295.00	\$ 236.00
6/28/2021	JN	Reviewed correspondence regarding third party subpoenas and worked on processing of same.[.2].	0.2	\$ 295.00	\$ 59.00
6/29/2021	JN	Reviewed correspondence and summary of case law applicable to defendant's latest discovery requests.[.1]; Reviewed documents and continued URL research.[2.9]	3	\$ 295.00	\$ 885.00
6/29/2021	JN	Worked on issues concerning data and responses to defendant's latest discovery requests.[.7]	0.9	\$ 295.00	\$ 265.50
6/30/2021	JN	Worked on issues regarding sources of leads and joining of third party productions to call records.[.3]	0.3	\$ 295.00	\$ 88.50
7/2/2021	JN	Worked on PillPack data analysis.[.8]	0.8	\$ 295.00	\$ 236.00
7/7/2021	JN	Continued work on data and responses to discovery requests.[5.9]	5.9	\$ 295.00	\$ 1,740.50
7/12/2021	JN	Worked on research for responses to motions on IP addresses, Fluent subsidiaries, and other entities responsible for hosting sites.[1.7]; Prepared documents to be produced with discovery responses.[.2];	1.9	\$ 295.00	\$ 560.50
7/12/2021	JN	Worked on production of documents.[.3];	0.3	\$ 295.00	\$ 88.50
7/14/2021	JN	Prepared email regarding production of documents promised by Yodel and reviewed email regarding same.[.1];	0.1	\$ 295.00	\$ 29.50
7/16/2021	JN	Worked on processing and review of data produced by Yodel.[.4]	0.4	\$ 295.00	\$ 118.00
7/19/2021	JN	Prepared email regarding findings in Yodel data and reviewed responses to same.[.1]; Reviewed data and prepared summary of same.[.5];	0.6	\$ 295.00	\$ 177.00
7/20/2021	JN	Worked on data analysis, identifying key points for inclusion in declaration.[4.4]; Worked on draft subpoena to Yodel.[.1];	4.5	\$ 295.00	\$ 1,327.50

Date	Timekeeper	Narrative	Units	Rate	Value
7/21/2021	JN	Worked on processing of correspondence with third parties regarding subpoena responses for production.	0.3	\$ 295.00	\$ 88.50
7/22/2021	JN	Worked on data analysis. [1.6]	1.6	\$ 295.00	\$ 472.00
7/26/2021	JN	Worked on PillPack data analysis and review of Yodel deposition.	2.7	\$ 295.00	\$ 796.50
7/29/2021	JN	Reviewed brief and worked on data to obtain numbers for inclusion in same[6]	6	\$ 295.00	\$ 1,770.00
7/30/2021	JN	Wored on data analysis [.2]	0.2	\$ 295.00	\$ 59.00
7/30/2021	JN	Worked on data analysis.[.6]	0.6	\$ 295.00	\$ 177.00
7/30/2021	JN	Worked on data analysis.	3.9	\$ 295.00	\$ 1,150.50
8/2/2021	JN	Reviewed emails enclosing responses and objections to subpoenas and updated production log to include same.[.3]; Worked on strategy in eliminating and including phone numbers in class based on lead source.[.3]	0.6	\$ 295.00	\$ 177.00
8/2/2021	JN	Worked on PillPack data and review of brief.; Reviewed exhibits, placeholders and motions to seal.[.3]	2.2	\$ 295.00	\$ 649.00
8/2/2021	JN	Worked on data anlaysis[.7]	0.7	\$ 295.00	\$ 206.50
8/3/2021	JN	Worked on revisions to class notice.[1.4]; Worked on data analysis and prepared annotated copy of working notice plan.[.4]; Worked on plans for further analysis and figures to be included in notice plan.[.2]; Reviewed emails enclosing drafts of amended subpoena for production of documents and deposition of	2	\$ 295.00	\$ 590.00
8/4/2021	JN	Yodel.[.1]	0.1	\$ 295.00	\$ 29.50
8/4/2021	JN	Completed data analysis and prepared working class list with statistics for same.[3.1]	3.1	\$ 295.00	\$ 914.50
8/5/2021	JN	Worked on preparations for upcoming deposition of Yodel Technologies.[.4];	0.4	\$ 295.00	\$ 118.00
8/6/2021	JN	Worked on review and revisions to brief, declaration in support, and exhibits.[2]	2	\$ 295.00	\$ 590.00
8/9/2021	JN	Reviewed email regarding production of correspondence regarding third parties and confirmed completion of same.[.1]	0.1	\$ 295.00	\$ 29.50
8/11/2021	JN	Worked on review and compilation of materials for deposition of Yodel.[.2]; Prepared spreadsheet of phone numbers and email to Ms. Fairchild enclosing same.[.1]	0.3	\$ 295.00	\$ 88.50
8/11/2021	JN	Worked on pulling documents and excerpting data files for Yodel deposition.[2.6]	2.6	\$ 295.00	\$ 767.00
8/12/2021	JN	Reviewed email from Mr. Watkins regarding deposition and prepared email regarding subpoena for same.[.1]; Reviewed pricing sheets for Storycloud and Veritext and prepared emails regarding same.[.2];	0.6	\$ 295.00	\$ 177.00
8/12/2021	JN	Worked on preparing excerpts of data files[.3];	0.1	\$ 295.00	\$ 29.50
8/12/2021	JN	Reviewed draft amended subpoena and prepared email regarding service of same.[.1];	0.1	\$ 295.00	\$ 29.50
8/12/2021	JN	Reviewed email to Mr. Watkins regarding service of amended subpoena.[.1]	0.1	\$ 295.00	\$ 29.50
8/16/2021	JN	Reviewed deposition outline and prepared excerpts referenced in same.[1.2]	1.2	\$ 295.00	\$ 354.00
8/16/2021	JN	Worked on strategy for further analyses of data in advance of Yodel depositions.[.5]	0.5	\$ 295.00	\$ 147.50
8/17/2021	JN	Reviewed email regarding revisions to exhibits for Yodel deposition and worked on same.[.8]	0.8	\$ 295.00	\$ 236.00
8/18/2021	JN	Reviewed notices of depositions for third parties and continued earlier research on same.[1.8]	1.8	\$ 295.00	\$ 531.00
8/19/2021	JN	Reviewed email to Ms. Rainwater regarding correspondence with third parties regarding subpoenas an depositions and responses to same.[.1]	0.1	\$ 295.00	\$ 29.50
8/19/2021	JN	Worked on third party subpoena issues	0.6	\$ 295.00	\$ 177.00
8/19/2021	JN	Worked on URL/third party research.[1]	1	\$ 295.00	\$ 295.00
8/19/2021	JN	Worked on strategy for preparing for upcoming depositions and research in connection with same.[1.4]	1.4	\$ 295.00	\$ 413.00
8/20/2021	JN	Worked on research and analysis of data based on URLs identified as belonging to various lead sources.[4.2]	4.2	\$ 295.00	\$ 1,239.00
8/23/2021	JN	Reviewed response to notice plan and prepared annotated draft.[.2]	0.2	\$ 295.00	\$ 59.00
8/23/2021	JN	Worked on analysis of list produced by Ms. Fairchild and prior productions.[.6]	0.6	\$ 295.00	\$ 177.00
8/24/2021	JN	Reviewed email from Ms. Cadely enclosing subpoenas to Flex Marketing and prepared email regarding same.[.1]	0.1	\$ 295.00	\$ 29.50
8/24/2021	JN	Reviewed emails regarding review of documents and further analysis of URL data.[.3]	0.3	\$ 295.00	\$ 88.50
8/26/2021	JN	Worked on preparation for deposition of Yodel and arrangements for same.[.4]	0.4	\$ 295.00	\$ 118.00

Date	Timekeeper	Narrative	Units	Rate	Value
8/27/2021	JN	Worked on preparation for deposition of Yodel.[.3]	0.3	\$ 295.00	\$ 88.50
8/27/2021	JN	Dep prep[2]	2	\$ 295.00	\$ 590.00
8/30/2021	JN	Worked on deposition preparation.	4.6	\$ 295.00	\$ 1,357.00
8/30/2021	JN	Team calls regarding deposition preparation.	1.3	\$ 295.00	\$ 383.50
8/30/2021	JN	Worked on iPro database to identify status of production communications and prepared Emils regarding same.[1.9]	1.9	\$ 295.00	\$ 560.50
8/31/2021	JN	Yodel dep prep.	0.9	\$ 295.00	\$ 265.50
9/1/2021	JN	Worked on analysis and further preparations for deposition of Mr. Wood.[5.8]	5.8	\$ 295.00	\$ 1,711.00
9/2/2021	JN	Attended deposition of Mr. Wood and continued preparation of exhibits for use in same.[5.4]	5.4	\$ 295.00	\$ 1,593.00
9/7/2021	JN	Reviewed email regarding drafting of declaration concerning Little Brook websites and prepared email regarding same.[.1]	0.1	\$ 295.00	\$ 29.50
9/7/2021	JN	Worked on research and screenshot/recordings for Little Brook URLs.[3.6]	3.6	\$ 295.00	\$ 1,062.00
9/7/2021	JN	Worked on processing of production.[.2]	0.2	\$ 295.00	\$ 59.00
9/7/2021	JN	Reviewed email regarding upcoming filings and information to be added into same.[.1]; Worked on production of documents, deduplication of same.[.4]; Prepared email to all counsel enclosing same.[.1];	0.6	\$ 295.00	\$ 177.00
9/8/2021	JN	Worked on task list for filing.[.3]	0.3	\$ 295.00	\$ 88.50
9/8/2021	JN	Worked on motion to amend class definition.[5.7]	5.7	\$ 295.00	\$ 1,681.50
9/9/2021	JN	Reviewed email from Mr. Paronich regarding deposition of Fluent and Ms. Fairchild's response to same.[.1]	0.1	\$ 295.00	\$ 29.50
9/9/2021	JN	Worked on discovery responses.[.4]	0.4	\$ 295.00	\$ 118.00
9/21/2021	JN	Reviewed email from Ms. Fairchild regarding list of numbers referenced in motion to modify class definition and prepared response to same.[.1]; Reviewed emails	0.1	\$ 295.00	\$ 29.50
9/21/2021	JN	Worked on task list for upcoming deadlines and depositions.[.4]; Reviewed email from Mr. Fielder regarding proposed revisions to ESI protocol and prepared email regarding concerns with same.[.3];	0.9	\$ 295.00	\$ 265.50
9/21/2021	JN	Reviewed email from Mr. Watkins enclosing campaign key and analyzed same.[.2];	0.2	\$ 295.00	\$ 59.00
9/21/2021	JN	Reviewed deposition outline and made notes regarding same.[.2]	0.2	\$ 295.00	\$ 59.00
9/22/2021	JN	Prepared for and attended deposition of Yodel Technologies.[1.3]; Reviewed draft deposition subpoena to Fluent and documents produced by PillPack relating to topics in same.[.3];Worked on data analysis.[4]	5.6	\$ 295.00	\$ 1,652.00
9/23/2021	JN	Worked on outstanding discovery task list and deposition outlines.[.2]; Team video conference regarding outstanding tasks and upcoming discovery conference.[.6]	0.8	\$ 295.00	\$ 236.00
9/23/2021	JN	Worked on Lexis Nexis deposition outline and conducted research regarding same.[6.6]	6.6	\$ 295.00	\$ 1,947.00
9/24/2021	JN	Conducted search for documents potentially duplicated between deposition outline and prior and prepared notes regarding same.[.4]	0.4	\$ 295.00	\$ 118.00
9/27/2021	JN	Reviewed email regarding deposition prep and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
9/27/2021	JN	Worked on depo prep[2.3]	2.3	\$ 295.00	\$ 678.50
9/27/2021	JN	Depo prep	0.6	\$ 295.00	\$ 177.00
9/28/2021	JN	Worked on deposition prep.[1.6]; Attended deposition of Mr. Hunt.[6]	7.6	\$ 295.00	\$ 2,242.00
9/29/2021	JN	Prepared for depositions.[.9]; Attended deposition of Fluent, Inc.[5.3]	6.2	\$ 295.00	\$ 1,829.00
9/30/2021	JN	Reviewed email from Ms. Fairchild regarding deposition exhibits and prepared response to same.[.1]; Reviewed emails concerning opposing counsel's concerns about imaging process and plans for proceeding with same.[.1]	0.2	\$ 295.00	\$ 59.00
9/30/2021	JN	Worked on production processing and research on evidence of prerecord[6]	6	\$ 295.00	\$ 1,770.00
10/1/2021	JN	Call regarding research and responses to discovery request.[.3]	0.3	\$ 295.00	\$ 88.50
10/1/2021	JN	Worked on deposition prep.[.6]; Reviewed emails concerning various discovery matters.[.1]	0.7	\$ 295.00	\$ 206.50
10/1/2021	JN	Worked on data/document production processing.	4.2	\$ 295.00	\$ 1,239.00
10/4/2021	JN	Worked on further data analysis.[.7]; Worked on strategy for further analysis and reply in support of motion to expand class.[.2]	0.9	\$ 295.00	\$ 265.50
10/4/2021	JN	Worked on further data/doc analysis	3.7	\$ 295.00	\$ 1,091.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/5/2021	JN	Reviewed defendant's response to motion to modify class.	0.2	\$ 295.00	\$ 59.00
10/5/2021	JN	Worked on deposition prep.[3.1]; call regarding same.[.2]	3.3	\$ 295.00	\$ 973.50
10/6/2021	JN	Reviewed documents produced by internet archive.[.2]	0.2	\$ 295.00	\$ 59.00
10/7/2021	JN	Reviewed emails from Ms. Howe regarding exhibits and transcript order and prepared responses enclosing same.[.2]; Reviewed email from Mr. Watkins enclosing errata sheet for deposition of Mr. Wood.[.1];	0.3	\$ 295.00	\$ 88.50
10/7/2021	JN	Data[5.1]	5.1	\$ 295.00	\$ 1,504.50
10/8/2021	JN	Worked on data analysis and brief.[8.5]	8.5	\$ 295.00	\$ 2,507.50
10/13/2021	JN	Reviewed defendant's notice of intent to file sur-reply.[.1]; Worked on analysis to confirm accuracy of conclusions drawn in Spicer declarations.[2.8]	2.9	\$ 295.00	\$ 855.50
10/13/2021	JN	Reviewed email from Ms. Mitterndorfer enclosing production documents and processed same.[.4]	0.4	\$ 295.00	\$ 118.00
10/15/2021	JN	Telephone conference with Ms. Verkhovskaya regarding further analysis.[.4]	0.4	\$ 295.00	\$ 118.00
10/21/2021	JN	Reviewed email from Ms. Peters-Stasiewicz regarding output file and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
10/26/2021	JN	Worked on analysis of leads originating from Reservetech website.[.7]; Telephone conference regarding same.[.6]	1.3	\$ 295.00	\$ 383.50
10/26/2021	JN	Worked on analysis and joining of Anya's output file.	3.3	\$ 295.00	\$ 973.50
10/26/2021	JN	Data	0.6	\$ 295.00	\$ 177.00
10/27/2021	JN	Reviewed emails regarding preparation of class list for Epiq and prepared response to same.[.1]; Reviewed email from Ms. La Count regarding upload of data and prepared response to same.[.1]; Worked on export of class data and contact information for Epiq and uploaded same via FTP.[2.5]	2.7	\$ 295.00	\$ 796.50
10/27/2021	JN	Data analysis re Spicer decl	2.8	\$ 295.00	\$ 826.00
10/28/2021	JN	Reviewed emails from Ms. La Count regarding draft declaration and delivery of final class data and prepared response to same.[.1]; Worked on PillPack data.[2.9]; Ms. Rainwater regarding request for opt-in records and prepared response to same.[.1];	3.1	\$ 295.00	\$ 914.50
11/1/2021	JN	Reviewed supplemental reply in support of motion to amend class definition and marked same for potential redactions.[.3]; Applied redactions to brief for refiling.[.1]	0.4	\$ 295.00	\$ 118.00
11/5/2021	JN	Reviewed email from Ms. LaCount regarding plans for moving forward with notice in light of ruling and orders referenced in same.[.3]	0.3	\$ 295.00	\$ 88.50
11/8/2021	JN	Reviewed forensic report on imaging of Mr. Williams devices and responsive files identified.[.3]; Prepared email to team enclosing summary of same.[.1];	0.4	\$ 295.00	\$ 118.00
11/9/2021	JN	Worked on analysis of potential narrowed class.[.6]; Attended team call regarding same.[1.7];	2.3	\$ 295.00	\$ 678.50
11/10/2021	JN	Reviewed Vestige report, files located, and privileged documents previously logged and prepared email summarizing findings of same.[1.3]; Worked on data analysis.[2.8]	4.1	\$ 295.00	\$ 1,209.50
11/10/2021	JN	Prepared privilege log and summary of same.[.6]; Reviewed emails regarding imaging of LG G5 device and discussion with Mr. Williams regarding same.[.1]	0.7	\$ 295.00	\$ 206.50
11/12/2021	JN	Reviewed emails regarding device imaging results, privilege log, and documents referenced in same,[.2]; Call regarding same.[.4]	0.6	\$ 295.00	\$ 177.00
11/12/2021	JN	Prepared exhibit for refiling and email regarding same.[.2]; Prepared final package of documents to produce in connection with Vestige analysis.[1.6]; Call regarding revisions to privilege log and production of documents.[.1]	1.9	\$ 295.00	\$ 560.50
11/12/2021	JN	Worked on finalizing edits to document production, metadata files, and privilege log.[1.4]; Worked on data analysis.[1.8]	3.2	\$ 295.00	\$ 944.00
11/15/2021	JN	Worked on organizing and logging recent production documents.[.2]	0.2	\$ 295.00	\$ 59.00
11/15/2021	JN	Worked on data analysis[2.2]; team call re same [.6];	2.8	\$ 295.00	\$ 826.00
11/16/2021	JN	Worked on data analysis	2.9	\$ 295.00	\$ 855.50
11/16/2021	JN	Reviewed email from Mr. Franz regarding results of forensic analysis and request to remedy same.[.1]; Attended team call regarding deadlines, data analysis, and response to Mr. Franz's concerns about forensic analysis.[1.4];	1.5	\$ 295.00	\$ 442.50

Date	Timekeeper	Narrative	Units	Rate	Value
11/17/2021	JN	Worked on data analysis.[6.5]; Reviewed email from Mr. Smith regarding enclosing draft letter to Vestige in connection with analysis of additional phone.[.1]; reviewed email to Mr. Payson regarding concerns with Vestige report and methodology and responses to same.[.1]; Reviewed email regarding data points for use in preliminary approval motion and requirements in settlement agreement and analyzed data to identify same.[.9]	7.6	\$ 295.00	\$ 2,242.00
11/18/2021	JN	Prepared additional documents sent by Vestige for production and updated log to reflect same.[.4]	0.4	\$ 295.00	\$ 118.00
11/22/2021	JN	Reviewed email from Ms. LaCount regarding resetting of deadlines and plans for docketing monitoring in light of same.[.1]	0.1	\$ 295.00	\$ 29.50
11/29/2021	JN	Worked on data.[.1]	0.1	\$ 295.00	\$ 29.50
12/1/2021	JN	Worked on strategy for further analysis of data and plan for revisions to expert reports.[.6]	0.6	\$ 295.00	\$ 177.00
12/1/2021	JN	Worked on data analysis.[4.4]	4.4	\$ 295.00	\$ 1,298.00
12/2/2021	JN	Worked on data analysis.[5];	5	\$ 295.00	\$ 1,475.00
12/3/2021	JN	Finalized data analysis and chart of statistics.[4]	4	\$ 295.00	\$ 1,180.00
12/6/2021	JN	Completed summary of analysis and finalized spreadsheet enclosing statistics for further expert report.[.2]; Continued to work on same.[1.3]	1.5	\$ 295.00	\$ 442.50
12/6/2021	JN	Worked on strategy for upcoming expert reports [.1.6]; Compiled call records for further analysis and prepared email to Mr. Hansen enclosing same.[.3]	1.9	\$ 295.00	\$ 560.50
12/8/2021	JN	Telephone conferences with Ms. Rhodes regarding forensic analysis of Plaintiff's devices.[.2]; Worked on strategy regarding same.[.4]	0.6	\$ 295.00	\$ 177.00
12/8/2021	JN	Prepared documents produced by Vestige for production and updated privilege log.[.6]; Renumbered prior production and updated production log to reflect numbering discrepancies.[.3];	0.9	\$ 295.00	\$ 265.50
12/9/2021	JN	Reviewed email from Ms. Peters-Stasiewicz regarding subpoenas to Nexxa and prepared response to same.[.1]; Worked on issues regarding draft supplemental report of Vestige's forensic analysis.[.3]	0.4	\$ 295.00	\$ 118.00
12/10/2021	JN	Reviewed emails from Ms. Peters-Stasiewicz regarding Nexxa subpoenas and prepared responses enclosing documents relating to same.[.2]	0.2	\$ 295.00	\$ 59.00
12/29/2021	JN	Worked on various discovery issues.[.2]; Reviewed emails to Ms. Rhodes regarding device inspection.[.1]	0.3	\$ 295.00	\$ 88.50
12/29/2021	JN	Analyzed various discovery issues.[1.8].	1.8	\$ 295.00	\$ 531.00
12/30/2021	JN	Continued to analyze various discovery issues[3.6].	3.6	\$ 295.00	\$ 1,062.00
1/6/2022	JN	Worked on strategy for draft of Mr. Hansen's report and further analysis for same.[.4]	0.4	\$ 295.00	\$ 118.00
1/6/2022	JN	Telephone conference with Mr. Hansen regarding analysis of opt-in database and transfer records.[.1]	0.1	\$ 295.00	\$ 29.50
1/6/2022	JN	Worked with Mr. Hansen to troubleshoot data issues[3]	3	\$ 295.00	\$ 885.00
1/10/2022	JN	Worked on motion for protective order.[.4];	0.4	\$ 295.00	\$ 118.00
1/10/2022	JN	Worked on exhibits	1.1	\$ 295.00	\$ 324.50
1/11/2022	JN	Telephone conference with Mr. Hansen regarding status of analysis.[.3]	0.3	\$ 295.00	\$ 88.50
1/13/2022	JN	Worked on validation of Mr. Hansen's analysis.[2.1]	2.1	\$ 295.00	\$ 619.50
1/14/2022	JN	Calls with Mr. Hansen.[.5]; Worked on validation of data analysis.[3.6]; reviewed expert report and suggested changes to same.[.4]	4.5	\$ 295.00	\$ 1,327.50
1/18/2022	JN	Worked on strategy for revisions to expert report.[.1]; Reviewed email from Ms. Rainwater regarding missing exhibits and prepared response to same.[.1]	0.2	\$ 295.00	\$ 59.00
1/18/2022	JN	Worked on issues with expert report and continued to assist troubleshooting same[4.0].	4	\$ 295.00	\$ 1,180.00
1/21/2022	JN	Telephone conference with Mr. Hansen regarding revisions to output files for production.[.4]; Prepared email to Mr. Franz enclosing Mr. Hansen's output files.[.1]; Worked on updating production log to include recent productions.[.1]	0.6	\$ 295.00	\$ 177.00
1/24/2022	JN	Compared opt-in data to Mr. Hansen's output identifying violation calls to confirm no additional phone numbers should be excluded due to erroneous use of date filter.[.4]	0.4	\$ 295.00	\$ 118.00
2/1/2022	JN	Reviewed emails and compiled documents for production in response to subpoena to Mr. Hansen.[.3]	0.3	\$ 295.00	\$ 88.50

Date	Timekeeper	Narrative	Units	Rate	Value
2/4/2022	JN	Strategized about class certification issues.[.4]	0.4	\$ 295.00	\$ 118.00
2/7/2022	JN	Worked on data analysis.[1.5];	1.5	\$ 295.00	\$ 442.50
2/15/2022	JN	Reviewed email from Mr. Franz regarding subpoena to Mr. Hansen.[.1]	0.1	\$ 295.00	\$ 29.50
3/7/2022	JN	Worked on strategy for rebuttal report and subpoena responses.[.4];	0.4	\$ 295.00	\$ 118.00
3/7/2022	JN	Reviewed reports and data	2	\$ 295.00	\$ 590.00
3/8/2022	JN	Worked on strategy for Mr. Hansen's rebuttal report.[.1]; Worked on subpoena production for Mr. Hansen.[.4]	0.5	\$ 295.00	\$ 147.50
3/9/2022	JN	Worked on responses and objections to subpoena issued to Mr. Hansen and documents for production with same.[2]; Continued working on processing and tagging of emails for production.[.4];	2.4	\$ 295.00	\$ 708.00
3/10/2022	JN	Worked on subpoena response.[1.3]; Telephone conference with Mr. Hansen regarding same.[.1];	1.4	\$ 295.00	\$ 413.00
3/10/2022	JN	Continued working with expert on subpoena response.[1.1].	1.1	\$ 295.00	\$ 324.50
3/11/2022	JN	Worked with expert to respond to subpoena.[1.8]	1.8	\$ 295.00	\$ 531.00
4/11/2022	JN	Worked on strategy for further analysis and evidence to be submitted in support of motion for class certification.	0.5	\$ 295.00	\$ 147.50
4/11/2022	JN	Worked on data analysis for class certification.	1.7	\$ 295.00	\$ 501.50
4/12/2022	JN	Continued to work on data analysis for class certification[.3].	0.3	\$ 295.00	\$ 88.50
4/12/2022	JN	Continued to work on data analysis for class certification[6.4].	6.4	\$ 295.00	\$ 1,888.00
4/13/2022	JN	Worked on issues regarding evidentiary issues to address in motion for class certification	0.5	\$ 295.00	\$ 147.50
4/13/2022	JN	Worked on case management issues and outline for exhibit index.[.6];	0.6	\$ 295.00	\$ 177.00
4/13/2022	JN	Analyzed data for class certification.	0.9	\$ 295.00	\$ 265.50
4/13/2022	JN	Analyzed data for class certification.	1	\$ 295.00	\$ 295.00
4/14/2022	JN	Analyzed data for class certification.	1.2	\$ 295.00	\$ 354.00
4/14/2022	JN	Continued to analyze data for class certification.[1.4]	1.4	\$ 295.00	\$ 413.00
4/15/2022	JN	Worked on document management issues regarding Sharecare productions.[.2]	0.2	\$ 295.00	\$ 59.00
4/18/2022	JN	Worked on evidentiary issues and plans for further analysis of data for motion for class certification.[.5]	0.5	\$ 295.00	\$ 147.50
4/18/2022	JN	Recording review and data[.7]	0.7	\$ 295.00	\$ 206.50
4/18/2022	JN	Worked on data analysis	1.6	\$ 295.00	\$ 472.00
4/19/2022	JN	Worked on data analysis for class certification.	1.5	\$ 295.00	\$ 442.50
4/19/2022	JN	Continued to analyze data issues for class certification.	6.9	\$ 295.00	\$ 2,035.50
4/20/2022	JN	Worked on issues regarding evidence for filing with renewed motion for class certification.[.5]	0.5	\$ 295.00	\$ 147.50
4/20/2022	JN	Worked on compiling exhibits for class certification motion[5.9]	5.9	\$ 295.00	\$ 1,740.50
4/21/2022	JN	Worked on compiling exhibits for class certification[4.1]	4.1	\$ 295.00	\$ 1,209.50
4/22/2022	JN	Worked on motion for class cert.[9.7]	9.7	\$ 295.00	\$ 2,861.50
4/25/2022	JN	Prepared letters and flash drives for delivery to court.[.4];	0.4	\$ 295.00	\$ 118.00
5/4/2022	JN	Prepared letter to Ms. Mitterdorfer enclosing recordings and flash drive for delivery with same.[.3]	0.3	\$ 295.00	\$ 88.50
5/10/2022	JN	Reviewed defendants response to motion to seal.[.2]	0.2	\$ 295.00	\$ 59.00
5/23/2022	JN	Researched and analyzed factual statements in Barsky declaration.	0.8	\$ 295.00	\$ 236.00
5/24/2022	JN	Worked on issues regarding reply in support of motion for class certification.[.2]; Reviewed opposition to motion for class certification and consent evidence and testimony offered in various cases.[2]	2.2	\$ 295.00	\$ 649.00
5/26/2022	JN	Continued to analyze factual issues for class certification reply.[1.3]	1.3	\$ 295.00	\$ 383.50
5/31/2022	JN	Analyzed various data issues for class certification reply[7.9].	7.9	\$ 295.00	\$ 2,330.50
6/1/2022	JN	Analyzed factual issues for class certification reply.[.6]	0.6	\$ 295.00	\$ 177.00
6/2/2022	JN	Worked on compilation of consent evidence and chart.[3.2]; Reviewed and revised draft brief.[.2]; Reviewed record to confirm non-duplication of exhibits and prepared exhibits to reply in support of motion for class certification.[.6]	4	\$ 295.00	\$ 1,180.00
6/3/2022	JN	Worked on declaration and exhibits in support of reply in support of motion for class certification.	0.8	\$ 295.00	\$ 236.00
6/24/2022	JN	Reviewed motion for summary judgment and reviewed documents to identify potential exhibits to file with response to same.[1.2]	1.2	\$ 295.00	\$ 354.00

Date	Timekeeper	Narrative	Units	Rate	Value
7/1/2022	JN	Finalized declaration, exhibits, and numbering for response to motion for summary judgment.[6.4]	6.4	\$ 295.00	\$ 1,888.00
7/11/2022	JN	Reviewed response to motion for summary judgment.[.2]; Prepared exhibits to response to second motion for summary judgment and listing of confidential portions for use during meet and confer process.[1.3]; worked on plans for revisions and cite checking.[.2]; Worked on finalizing exhibits and cite checking.[.3];	0.2	\$ 295.00	\$ 59.00
7/11/2022	JN	Cite checking	1.7	\$ 295.00	\$ 501.50
12/5/2022	JN	Reviewed order denying motion for summary judgment.[.2]	0.2	\$ 295.00	\$ 59.00
12/23/2022	JN	Reviewed class cert order.[.3]; Worked on issues regarding narrowing of class and reviewed pleadings re same.[1.7]	2	\$ 295.00	\$ 590.00
1/2/2023	JN	Worked on issues regarding notice plan and preparation of class list.[.2]; Prepared list of phone numbers with calls tied to Fluent/Finance Done Right leads and email summary regarding same.[1.6]	1.8	\$ 295.00	\$ 531.00
1/9/2023	JN	Reviewed emails from Ms. La Count regarding notice plan and enclosing proposed materials.[.1]	0.1	\$ 295.00	\$ 29.50
1/9/2023	JN	Worked on assembly of class list.	6.2	\$ 295.00	\$ 1,829.00
1/10/2023	JN	Attended meet and confer[.5]; Team call.[.1]; Exported class list.[.3]	0.9	\$ 295.00	\$ 265.50
1/11/2023	JN	Worked on export of class list.[.6];	0.6	\$ 295.00	\$ 177.00
1/23/2023	JN	Call with Epiq team regarding notice plans.[.4]; research re data sources for reverse lookups.[.2]	0.6	\$ 295.00	\$ 177.00
1/24/2023	JN	Assisted with data issues for compiling class list[1.7].	1.7	\$ 295.00	\$ 501.50
2/2/2023	JN	Worked on motion to approve notice plan, declaration in support, and exhibits to same.[1.9];	1.9	\$ 295.00	\$ 560.50
2/15/2023	JN	Worked on issues regarding reply in support of motion to approve notice plan	1	\$ 295.00	\$ 295.00
2/15/2023	JN	Worked on potential strategy for refuting suggestions made in response to motion for approval of notice plan	2.3	\$ 295.00	\$ 678.50
2/16/2023	JN	Continued review of briefing and data to identify potential strategies for reply in support of motion to approve notice plan.	1.2	\$ 295.00	\$ 354.00
3/20/2023	JN	Reviewed order granting motion to approve notice plan and discussion regarding same.[.3]	0.3	\$ 295.00	\$ 88.50
3/22/2023	JN	Team call regarding lookup process.[.1]	0.1	\$ 295.00	\$ 29.50
3/23/2023	JN	Video conference with Epiq regarding additional data needed for next steps in reverse lookup process.	0.4	\$ 295.00	\$ 118.00
3/23/2023	JN	Prepared class list with additional fields requested by Epiq[.8]; worked on issues regarding export of relevant documents in chronological order.[.6]	1.4	\$ 295.00	\$ 413.00
3/24/2023	JN	Prepared emails to counsel and settlement administrator enclosing ShareFile links to notice and class data.[.2]	0.2	\$ 295.00	\$ 59.00
4/4/2023	JN	Reviewed data to determine existence of confidentiality issues with production of class list with subpoena to Performance Media.[.2]	0.2	\$ 295.00	\$ 59.00
4/5/2023	JN	Worked on document review to confirm confidentiality status of class list and prepared same for service with subpoena.[.2]; Reviewed emails regarding service of class list with subpoena and prepared link to same.[.1]	0.3	\$ 295.00	\$ 88.50
4/5/2023	JN	Reviewed letter from Mr. Franz regarding class notice and prepared email [.3]	0.3	\$ 295.00	\$ 88.50
4/6/2023	JN	Worked on issues regarding data provided to Epiq.[.4]	0.4	\$ 295.00	\$ 118.00
4/6/2023	JN	Continued to analyze issues regarding data provided to Epiq.[3.2]	3.2	\$ 295.00	\$ 944.00
4/7/2023	JN	Exported class list.[1.1]; prepared email to Ms. LaCount enclosing revised class list.[.1]; reviewed email from Mr. Paronich enclosing expert output.[.1]; Telephone conference with Ms. LaCount regarding new data.[.3];	1.6	\$ 295.00	\$ 472.00
4/7/2023	JN	Worked with new data[4]	4	\$ 295.00	\$ 1,180.00
4/10/2023	JN	Worked with PillPack data.[.7]; reviewed data to discuss during team call.[.4]; team call.[1.3]	2.4	\$ 295.00	\$ 708.00
4/11/2023	JN	Worked on aggregating numbers for subpoenas	2.8	\$ 295.00	\$ 826.00
4/12/2023	JN	Worked on subpoenas to wireless carriers.	3	\$ 295.00	\$ 885.00
4/14/2023	JN	Worked on telephone carrier subpoenas.	4.3	\$ 295.00	\$ 1,268.50
4/17/2023	JN	Worked on PillPack subpoena data export.[1]	1	\$ 295.00	\$ 295.00
4/17/2023	JN	Worked on subpoenas[2.9]	2.9	\$ 295.00	\$ 855.50

Date	Timekeeper	Narrative	Units	Rate	Value
4/18/2023	JN	Worked on issues regarding carrier subpoenas[3.9]; Reviewed email from Mr. Dorf regarding production of documents and prepared response to same.[.1]; Retrieved and logged documents produced on behalf of Performance Media.[.3]	4.3	\$ 295.00	\$ 1,268.50
4/18/2023	JN	Continued working on subpoena issues.[2.6]	2.6	\$ 295.00	\$ 767.00
4/19/2023	JN	Worked on issues regarding subpoena service and tracking.[.5]; Worked on issues regarding subpoena tracking and class notice.[.3];	0.8	\$ 295.00	\$ 236.00
4/21/2023	JN	Reviewed email from Mr. Vandenheuvel regarding exhibit to subpoena and prepared response to same.[.1]; worked on issues regarding subpoena status/reissue.[.4]; Worked on issues regarding service of subpoenas.[.5]	1	\$ 295.00	\$ 295.00
4/21/2023	JN	Telephone conference regarding status of subpoena response.[.2]; prepared follow-up email to Mr. Piper and enhanced Exhibit A.[.2]	0.4	\$ 295.00	\$ 118.00
4/24/2023	JN	Worked on subpoena management.[.6];	0.6	\$ 295.00	\$ 177.00
4/24/2023	JN	Telephone conference with Ms. Chona regarding Frontier's subpoena response charging structure.[.2]	0.2	\$ 295.00	\$ 59.00
4/25/2023	JN	Call with Mr. Maloney regarding subpoena responses.[.3]; Worked on subpoena tracking/responses.[.8];worked on issues re subpoena productions.[1];	2.1	\$ 295.00	\$ 619.50
4/26/2023	JN	Telephone conference with Mr. Iverson regarding concerns about subpoena.[.1]; Worked on processing of Performance Media production.[.4]; Reviewed email from Mr. Franz regarding alleged privilege of information responsive to subpoenas and prepared emails regarding same.[.2]	0.7	\$ 295.00	\$ 206.50
4/26/2023	JN	Worked on processing of Performance Media production[.4]; worked analysis of calling data production and discussion of further analysis of same.[.3]	0.7	\$ 295.00	\$ 206.50
4/28/2023	JN	Reviewed email from Ms. Anzalone regarding records custodian declaration and prepared response to same[.1]; worked on processing of subpoena responses[6.8].	6.9	\$ 295.00	\$ 2,035.50
5/1/2023	JN	Worked on issues regarding subpoena responses	2.7	\$ 295.00	\$ 796.50
5/2/2023	JN	Worked on management of subpoenas/responses.[.3]	0.3	\$ 295.00	\$ 88.50
5/3/2023	JN	Worked on processing of subpoena responses.[.4]	0.4	\$ 295.00	\$ 118.00
5/4/2023	JN	Worked on subpoena management.[.7]	0.7	\$ 295.00	\$ 206.50
5/5/2023	JN	Worked on subpoena processing.[.2];	0.2	\$ 295.00	\$ 59.00
5/5/2023	JN	Worked on processing of correspondence and subpoena responses for production and prepared email enclosing same.[2.8]	2.8	\$ 295.00	\$ 826.00
5/9/2023	JN	Prepared email to Ms. Turpin regarding request for meet and confer call.[.1]telephone conference with Ms. Turpin regarding meet and confer request.[.2]	0.3	\$ 295.00	\$ 88.50
5/11/2023	JN	Worked on issues regarding subpoena responses.[.2]; worked on subpoena tracking/status evaluation.[.9]; meeting re service of subpoenas.[.4]	1.5	\$ 295.00	\$ 442.50
5/11/2023	JN	Worked on revisions to subpoenas.	1.4	\$ 295.00	\$ 413.00
5/11/2023	JN	Managed responses to subpoenas.	0.3	\$ 295.00	\$ 88.50
5/12/2023	JN	Video conference with Ms. Lee regarding subpoena responses.[.2]	0.2	\$ 295.00	\$ 59.00
5/12/2023	JN	Subpoena tracking/research	2	\$ 295.00	\$ 590.00
5/16/2023	JN	Worked on subpoena management and number aggregation[.9]; Worked on research regarding legal entities for service of subpoenas[.6];	1.5	\$ 295.00	\$ 442.50
5/17/2023	JN	Reviewed email from Ms. Wahl enclosing subpoena responses.[.1]; Worked on declarations in support of motions to compel compliance to subpoena[.8].;	0.9	\$ 295.00	\$ 265.50
5/17/2023	JN	Worked on preparing exhibits and declarations for motions to enforce subpoena compliance.	2	\$ 295.00	\$ 590.00
5/19/2023	JN	Managed subpoena project and subpoena production processing; [2.6]	2.6	\$ 295.00	\$ 767.00
5/22/2023	JN	Telephone conference with Ms. Susan regarding subpoena response from NSightel Wireless.[.2]	0.2	\$ 295.00	\$ 59.00
5/25/2023	JN	Reviewed email from Ms. Roberts enclosing subpoena responses and prepared response to same.[.1]; Reviewed emails from Ms. Lee regarding T-Mobile's consent to production of select consumer data.[.1];	0.5	\$ 295.00	\$ 147.50
5/25/2023	JN	Worked on subpoena management/response processing.[.3]	0.5	\$ 295.00	\$ 147.50
5/25/2023	JN	Worked on subpoena management.	0.5	\$ 295.00	\$ 147.50
5/25/2023	JN	Call regarding proposal by T-Mobile to exclude prepaid numbers from search.[.2];	0.2	\$ 295.00	\$ 59.00

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5/25/2023	JN	Analyzed issues regarding T-Mobile subpoena response.	0.6	\$ 295.00	\$ 177.00
5/26/2023	JN	Reviewed email from Mr. Maloney enclosing responses to subpoena; worked on processing of same	0.6	\$ 295.00	\$ 177.00
5/26/2023	JN	Worked on processing of documents for production.	0.7	\$ 295.00	\$ 206.50
5/26/2023	JN	Worked on production of documents	1.4	\$ 295.00	\$ 413.00
6/6/2023	JN	Worked on processing of production.[.2];	0.2	\$ 295.00	\$ 59.00
6/9/2023	JN	Worked on management of outstanding subpoenas and response tracking.[.1]	0.1	\$ 295.00	\$ 29.50
6/12/2023	JN	Reviewed voicemails, numbers included on subpoena and prepared email regarding addressing same with Carolina West.[.4]	0.4	\$ 295.00	\$ 118.00
6/26/2023	JN	Reviewed email from Mr. Franz regarding upcoming deadlines for class notice.[.1]	0.1	\$ 295.00	\$ 29.50
6/28/2023	JN	Reviewed order on motion to enforce subpoena and correspondence with Ms. Lee regarding same.[.2]	0.2	\$ 295.00	\$ 59.00
6/29/2023	JN	Worked on review of lead generation subpoenas and review of lead counts associated with same.[.4]worked on issues regarding data production to opposing counsel.[.2];	0.6	\$ 295.00	\$ 177.00
6/30/2023	JN	Processing production of subpoena communications	5.8	\$ 295.00	\$ 1,711.00
7/5/2023	JN	Worked on subpoena management research project guidance and prepared reading materials for same.[.3]	0.3	\$ 295.00	\$ 88.50
7/7/2023	JN	Worked on strategy for identifying challenges to leads sourced from subpoenaed entities	0.4	\$ 295.00	\$ 118.00
7/11/2023	JN	Reviewed email from Ms. Mitterdorfer regarding assignment of numbers to Epiq produced file and prepared response to same.[.1]	0.1	\$ 295.00	\$ 29.50
7/13/2023	JN	Gathered research on lead generators that are focus of recent subpoenas and prepared summary of same.[.5]	0.5	\$ 295.00	\$ 147.50
7/17/2023	JN	Worked on processing of production documents;[.9];	0.9	\$ 295.00	\$ 265.50
7/26/2023	JN	Worked on issues regarding outstanding productions, data analysis, and class notice[0.9]	0.9	\$ 295.00	\$ 265.50
7/26/2023	JN	Processed documents produced in response to subpoenas.	0.9	\$ 295.00	\$ 265.50
7/27/2023	JN	Analyzed and cleaned up carrier data in preparation for class notice.	4.5	\$ 295.00	\$ 1,327.50
7/27/2023	JN	Reviewed email from Ms. Mitterdorfer regarding potential missing documents and prepared response to same.[.1]; Worked on identification of potential missing documents from Goldstar.[.2]; worked on processing of production documents.[.2]	0.5	\$ 295.00	\$ 147.50
7/28/2023	JN	Continued to analyze data for class notice.	4.6	\$ 295.00	\$ 1,357.00
8/2/2023	JN	Reviewed proposed outline for hierarchy of data usage for notice plan and prepared emails/calls regarding same.[.7]. Telephone conference regarding data delivery[.1]; Video conference with Epiq team regarding logistics regarding class notice.[.7]; Reviewed documents/data produced by wireless carriers and analyzed issues regarding discrepancies/formatting of same.[.9].	3.1	\$ 295.00	\$ 914.50
8/2/2023	JN	Analyzed data in preparation for class notice.	4.6	\$ 295.00	\$ 1,357.00
8/3/2023	JN	Worked on review and parsing of data for Epiq.[1.1]; Telephone conference with Epiq team regarding data mapping and plans for transmission of same.[.6]; reviewed and corrected manual data entry records.[3.1];	4.8	\$ 295.00	\$ 1,416.00
8/4/2023	JN	Worked on maintenance of preprod database for loading of outstanding productions.[.6]	0.6	\$ 295.00	\$ 177.00
8/4/2023	JN	Worked on document review and processing of data entry.[0.6]	0.6	\$ 295.00	\$ 177.00
8/7/2023	JN	Prepared documents for submission to opposing counsel, Epiq, and summary of same.[.6]	0.6	\$ 295.00	\$ 177.00
8/10/2023	JN	Reviewed correspondence with T-Mobile regarding subpoena[.1]; Telephone conference with T-Mobile regarding payment of invoice and prepared follow-up email regarding same.[.2]; Telephone conference with T-Mobile regarding notification received from Carolina West regarding subpoena.[.1]	0.4	\$ 295.00	\$ 118.00
8/10/2023	JN	Analyzed data for class notice.	2.3	\$ 295.00	\$ 678.50
8/11/2023	JN	Worked on data pull for meeting with consulting expert.[.6]; Video conference with consulting expert regarding discrepancies in subpoena responses.[.4];	1	\$ 295.00	\$ 295.00
8/22/2023	JN	Worked on troubleshooting production issues.	2.2	\$ 295.00	\$ 649.00
8/28/2023	JN	Worked on processing documents[1.1]	1.1	\$ 295.00	\$ 324.50
8/29/2023	JN	Worked on processing/review of Epiq communications for production and cleanup of pre-prod database[2.4];	2.4	\$ 295.00	\$ 708.00

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9/8/2023	JN	Analyzed data for class notice.	0.5	\$ 295.00	\$ 147.50
9/12/2023	JN	Worked on data scrub and validation of results.[.6]	0.6	\$ 295.00	\$ 177.00
9/20/2023	JN	Scrub and verification of overlap in calling data.[4.4]	4.4	\$ 295.00	\$ 1,298.00
9/25/2023	JN	Worked on production/privilege log	9.8	\$ 295.00	\$ 2,891.00
9/25/2023	JN	Worked on document production/privilege log.[2.9]	2.9	\$ 295.00	\$ 855.50
9/26/2023	JN	Worked on privilege log.[.8]	0.8	\$ 295.00	\$ 236.00
9/27/2023	JN	Worked on privilege log.[.7]	0.7	\$ 295.00	\$ 206.50
9/29/2023	JN	Worked on privilege log and edits to production documents.[4.8]	4.8	\$ 295.00	\$ 1,416.00
10/2/2023	JN	Meeting re privilege log and adjustments to same.[.6]	0.6	\$ 295.00	\$ 177.00
10/3/2023	JN	Worked on data analysis for various discovery matters.	1.1	\$ 295.00	\$ 324.50
10/4/2023	JN	Worked on privilege log[.8].	0.8	\$ 295.00	\$ 236.00
10/4/2023	JN	Worked on privilege log[.8].	1.2	\$ 295.00	\$ 354.00
10/5/2023	JN	Worked on privilege log and isolation of documents requiring revisions to redactions.[.7].	0.7	\$ 295.00	\$ 206.50
10/6/2023	JN	Worked on revisions to privilege log and conforming of redactions across versions of documents.[5.9]	5.9	\$ 295.00	\$ 1,740.50
10/6/2023	JN	Worked on processing of documents sent by Epiq to all counsel.[.2]	0.2	\$ 295.00	\$ 59.00
10/9/2023	JN	Worked on processing of final production and privilege log.[.6]	0.6	\$ 295.00	\$ 177.00
10/10/2023	JN	Reviewed email from Ms. Mitterdorfer regarding illegible documents and prepared response to same.[.1];	0.1	\$ 295.00	\$ 29.50
10/26/2023	JN	Worked on scrub results/comparison of Dorf data.[.9]	0.9	\$ 295.00	\$ 265.50
11/20/2023	JN	Prepared email to Ms. Henson regarding inability to access FTP account and reviewed responses to same.[.2]; Worked on processing of third party productions.[.9]	1.1	\$ 295.00	\$ 324.50
12/7/2023	JN	Reviewed document productions, identified gaps, and staged calling records for further review.[1.6];	2.5	\$ 295.00	\$ 737.50
12/11/2023	JN	Worked on further analysis.[0.9]	0.9	\$ 295.00	\$ 265.50
12/27/2023	JN	Prepared final filtered copies of bad transfers.[.9]	0.4	\$ 295.00	\$ 118.00
12/29/2023	JN	Reviewed email from Ms. Mitterdorfer regarding new link to March 2020 production and prepared response to same.[.1]; Worked on processing of production documents[.3];	1.2	\$ 295.00	\$ 354.00
1/2/2024	JN	Worked on processing of productions.[1.2]	1.6	\$ 295.00	\$ 472.00
1/9/2024	JN	Worked on review of documents produced in response to third party subpoenas and prepared email summary of same.[1.6]	2.2	\$ 295.00	\$ 649.00
1/11/2024	JN	Worked on processing of production.[.3]; worked on data analysis and prepared email summary of early analysis of same[1.9]	1.5	\$ 295.00	\$ 442.50
1/12/2024	JN	Worked on data analysis and summary.[.6]; attended team call regarding trial strategy.[.9]	2.4	\$ 295.00	\$ 708.00
1/22/2024	JN	Worked on data analysis.[2.4]	4	\$ 295.00	\$ 1,180.00
1/23/2024	JN	Worked with lead generator data and Epiq notice lists.[4.]	5.1	\$ 295.00	\$ 1,504.50
1/24/2024	JN	Worked on comparison of subpoena responses to notice list.[5.1]	1.8	\$ 295.00	\$ 531.00
1/25/2024	JN	Worked on data analysis[1.8]	5.4	\$ 295.00	\$ 1,593.00
1/26/2024	JN	Analyzed lead generator data.	2.7	\$ 295.00	\$ 796.50
1/29/2024	JN	Worked on processing of supplemental production[.8]; prepared email to all counsel enclosing same.[.1];	3.5	\$ 295.00	\$ 1,032.50
1/30/2024	JN	continued working on fuzzy matching to identify new notices to be issued.[1.8]	6.4	\$ 295.00	\$ 1,888.00
1/31/2024	JN	Worked on identifying accurate contact information for notice[3.5]	7.4	\$ 295.00	\$ 2,183.00
2/1/2024	JN	Continued to work on identifying accurate contact information for notice[6.4];	7.5	\$ 295.00	\$ 2,212.50
2/2/2024	JN	Continued to work on identifying accurate contact information for notice.[7.4].	2.4	\$ 295.00	\$ 708.00
2/5/2024	JN	Worked on review and further processing of documents produced in response to lead generator subpoenas.[1.1]; Worked on comparison of lead generator, TransUnion data, and notice list files versus documents produced by PillPack.[6.4]	1.7	\$ 295.00	\$ 501.50
		Worked on analysis of latest lead generator data files and researched lead generators that PillPack previously contracted with.[2.4]			
		Worked on processing of lead generator subpoenas.[.6]; worked on reconstructing timeline of data productions and call re same.[1.1]			

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2/6/2024	JN	Worked on processing of productions.[.3]; Worked on issues regarding review and substance of third party productions.[.5]	0.8	\$ 295.00	\$ 236.00
2/7/2024	JN	Prepared list with contact information for class members who were not issued notice.[.5]	0.5	\$ 295.00	\$ 147.50
2/7/2024	JN	Worked on doublechecking/correcting notice list issues.[4.5]	4.5	\$ 295.00	\$ 1,327.50
2/8/2024	JN	Worked on processing of production.[.4]	0.4	\$ 295.00	\$ 118.00
2/9/2024	JN	Team call.[.6]	0.6	\$ 295.00	\$ 177.00
2/12/2024	JN	Worked on creating a trial database.[2.2]	2.2	\$ 295.00	\$ 649.00
2/12/2024	JN	Worked on issues regarding upcoming deposition and responses to opposing counsel.[.3]	0.3	\$ 295.00	\$ 88.50
2/12/2024	JN	Worked on deposition/filing exhibit list and identification of status of subpoena responses.[2.1]	2.1	\$ 295.00	\$ 619.50
2/13/2024	JN	Worked on identification of status of subpoena responses and numbers affected by lack of responses to same.[1.6]; worked on processing of production.[.4];	2	\$ 295.00	\$ 590.00
2/13/2024	JN	Worked on review of document production.	0.9	\$ 295.00	\$ 265.50
2/14/2024	JN	Worked on document review and updates to defendant's subpoena tracker.[1.1]; prepared email to consulting expert regarding carrier lookup for additional class members.[.1]; worked on issues regarding supplemental notice.[.2]	1.4	\$ 295.00	\$ 413.00
2/15/2024	JN	Worked on processing of production; reviewed document production; identification of numbers to include in subpoenas.[4.3]	4.3	\$ 295.00	\$ 1,268.50
2/15/2024	JN	Worked on subpoenas and document review	2.9	\$ 295.00	\$ 855.50
2/20/2024	JN	Worked on preparing files for Mr. Hansen's review and logistics for explaining analyses to be performed.	0.7	\$ 295.00	\$ 206.50
2/20/2024	JN	Telephone conference with Mr. Hansen regarding scope of expert analysis and case status	1	\$ 295.00	\$ 295.00
2/20/2024	JN	Worked on formatting/update to workflows for Mr. Hansen's review	1.4	\$ 295.00	\$ 413.00
2/23/2024	JN	Video conference with Mr. Hansen regarding preparing expert report.[.4]; worked on preparation of data files/workflows.[7.8];	8.2	\$ 295.00	\$ 2,419.00
2/24/2024	JN	Worked with expert on preparation of workflows and discussion of issues regarding same.[.6];Video conference with Mr. Hansen regarding review of workflows and expert report.[3.5]; Worked on cleanup of workflows and creation of exhibits.[.8]	4.9	\$ 295.00	\$ 1,445.50
2/25/2024	JN	Prepared exhibits to Mr. Hansen's report.	0.8	\$ 295.00	\$ 236.00
2/27/2024	JN	Telephone conference with Ms. Debbie regarding delivery of data to Epiq.[.2];	0.2	\$ 295.00	\$ 59.00
2/27/2024	JN	Worked on preparing for deposition of Mr. Dorf.[1]	1	\$ 295.00	\$ 295.00
2/28/2024	JN	Worked on troubleshooting document production issues for privilege log.	1.1	\$ 295.00	\$ 324.50
3/1/2024	JN	Worked on processing of C-Spire subpoena response and created flow for evaluating second round subpoena responses. [1.1]	1.2	\$ 295.00	\$ 354.00
3/4/2024	JN	Worked on production of documents produced by Cellular South.[.2]; Worked on loading of production and review of same.[.4];	0.6	\$ 295.00	\$ 177.00
3/5/2024	JN	Worked on processing and cleanup of carrier productions and export of same for counsel.[1.4];	1.4	\$ 295.00	\$ 413.00
3/6/2024	JN	Worked on processing of subpoena response from Verizon.[.1]	0.1	\$ 295.00	\$ 29.50
4/11/2024	JN	Worked on processing of production of AT&T subpoena responses.[.2]	0.2	\$ 295.00	\$ 59.00
5/29/2024	JN	Worked on data analysis for mediation statement	1.1	\$ 295.00	\$ 324.50
7/18/2024	JN	Worked on identifying discrepancy in class lists.[.5]	0.5	\$ 295.00	\$ 147.50
8/26/2024	JN	Prepared class list and uploaded same to Eriq's ShareFile.[.2]	0.2	\$ 295.00	\$ 59.00
10/14/2024	JN	Worked on review of revised notice list sent by Mr. Meyer.[.2]; Worked on potential resolution for deficiencies in notice list.[.2]	0.4	\$ 295.00	\$ 118.00
10/15/2024	JN	Attended video conference with Epiq	0.8	\$ 295.00	\$ 236.00
10/16/2024	JN	Reviewed email from Mr. Meyer enclosing proposed schedule for notice.[.1]	0.1	\$ 295.00	\$ 29.50
Statement Professional: Jodi Nuss			980.7	\$	289,306.50
4/9/2019	JRM	Reviewed draft complaint [0.2]; analyzed issues regarding same[0.1]; reviewed and revised complaint[0.3].	0.6	\$ 725.00	\$ 435.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/28/2019	JRM	Reviewed letter from Mr. Payson regarding FRE 408 communication[0.3]; analyzed issues regarding same[0.2]; reviewed new cases regarding lead generation[0.5].	1	\$ 725.00	\$ 725.00
5/29/2019	JRM	Conference call regarding settlement offer and strategy[0.3]; followed up with same[0.2].	0.5	\$ 725.00	\$ 362.50
5/30/2019	JRM	Prepared for meet and confer with Mr. Payson[0.2]; personal conference with Mr. Payson regarding settlement[0.5].	0.7	\$ 725.00	\$ 507.50
6/10/2019	JRM	Drafted interrogatories[1.8]; drafted requests for production[2.5].	4.3	\$ 725.00	\$ 3,117.50
6/11/2019	JRM	Reviewed and revised discovery requests[0.5]; email correspondence regarding same[0.1].	0.6	\$ 725.00	\$ 435.00
7/8/2019	JRM	Worked on initial disclosures[0.5]; followed up with same[0.2].	0.7	\$ 725.00	\$ 507.50
7/9/2019	JRM	Email correspondence regarding protective order and ESI protocol[0.1]; worked on joint status report and proposed case schedule[1.2]; prepared for 26(f) conference[0.8]; continued to prepare for Rule 26(f) conference[1.1].	3.2	\$ 725.00	\$ 2,320.00
7/10/2019	JRM	Worked on joint status report[1.2]; reviewed stipulated protective order[0.1]; prepared for 26(f)[0.2].	1.5	\$ 725.00	\$ 1,087.50
7/10/2019	JRM	Attended 26(f) conference[1.0]; followed up with same[0.5]; gathered orders compelling classwide calling lists[0.4].	1.9	\$ 725.00	\$ 1,377.50
7/11/2019	JRM	Reviewed cases regarding absent class discovery and analyzed issues regarding same[1.5].	1.5	\$ 725.00	\$ 1,087.50
7/12/2019	JRM	Analyzed case law regarding absent class member discovery[1.2]; worked on JSR[2.5]; continued to work on same[0.3].	4	\$ 725.00	\$ 2,900.00
7/22/2019	JRM	Telephone conference with Mr. Smith regarding discovery[0.5]; worked on subpoenas[0.8]; analyzed issues related to vendors[0.7].	2	\$ 725.00	\$ 1,450.00
7/24/2019	JRM	Reviewed and revised meet and confer letter[0.5]; reviewed draft subpoenas[0.1]; email correspondence regarding same[0.1]; continued to work on meet and confer letter[0.2]; continued to revise discovery letter[0.5].	1.4	\$ 725.00	\$ 1,015.00
8/5/2019	JRM	Worked on discovery letter[0.5]; continued to work on same[2.5]; continued to work on same[3.6].	6.6	\$ 725.00	\$ 4,785.00
8/6/2019	JRM	Reviewed discovery responses for meet and confer letter[3.5]; continued to work on same[3.8].	7.3	\$ 725.00	\$ 5,292.50
8/7/2019	JRM	Worked on meet and confer letter[1.7]; revised letter[0.2]; worked on subpoenas to Prospects DM and Performance Media[2.2].	4.1	\$ 725.00	\$ 2,972.50
8/8/2019	JRM	Worked on subpoenas to Prospects DM and Performance Media Strategies[1.5]; analyzed issues regarding subpoenas[0.3]; reviewed and revised subpoena packets[0.2].	2	\$ 725.00	\$ 1,450.00
8/9/2019	JRM	Analyzed issues relating to Prospects DM and case strategy[1.0].	1	\$ 725.00	\$ 725.00
8/14/2019	JRM	Email correspondence regarding meet and confer[0.2].	0.2	\$ 725.00	\$ 145.00
8/15/2019	JRM	Reviewed PillPack changes to protective order and ESI agreement[0.3].	0.3	\$ 725.00	\$ 217.50
8/23/2019	JRM	Prepared for meet and confer[0.2]; telephone conference with opposing counsel regarding discovery issues[1.0].	1.2	\$ 725.00	\$ 870.00
8/29/2019	JRM	Telephone conference with Mr. Paronich regarding joining case[0.7]; worked on discovery issues[0.2].	0.9	\$ 725.00	\$ 652.50
8/30/2019	JRM	Reviewed documents[2.0]; continued to review same[0.5].	2.5	\$ 725.00	\$ 1,812.50
9/3/2019	JRM	Telephone conference with Mr. Smith regarding task list[0.5]; followed up regarding same[0.1]; drafted revised joint prosecution agreement[0.3]; revised same[0.5]; analyzed issues regarding discovery strategy[0.2].	1.6	\$ 725.00	\$ 1,160.00
9/5/2019	JRM	Email correspondence regarding JPA[0.1].	0.1	\$ 725.00	\$ 72.50
9/6/2019	JRM	Telephone conference with Mr. Paronich regarding task list[0.2]; reviewed correspondence and drafted task list[1.0]; reviewed Prospect DM documents and email correspondence regarding same[0.2]; drafted stipulated motion to extend[1.4]; drafted meet and confer email to PillPack[0.7].	3.5	\$ 725.00	\$ 2,537.50
9/9/2019	JRM	Reviewed Exhibit A to Tyler Hunt subpoena[0.1]; email correspondence regarding same[0.1]; worked on Exhibit A to Byte Success subpoena[0.5]; revised search terms[0.2]; continued to work on subpoenas[0.2].	1.1	\$ 725.00	\$ 797.50
9/10/2019	JRM	Email correspondence regarding search terms[0.1].	0.1	\$ 725.00	\$ 72.50
9/12/2019	JRM	Email correspondence regarding third party discovery follow up[0.2].	0.2	\$ 725.00	\$ 145.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/13/2019	JRM	Followed up on subpoenas[0.2]; analyzed issues regarding outstanding discovery[0.2]; prepared for meet and confer[0.5]; attended meet and confer[0.5]; followed up with same[0.5]; continued to follow up on discovery issues[0.3]; continued to followed up on discovery issues[0.2].	2.4	\$ 725.00	\$ 1,740.00
9/19/2019	JRM	Telephone call from Mr. Paronich regarding schedule[0.2].	0.2	\$ 725.00	\$ 145.00
9/23/2019	JRM	Email correspondence regarding stipulation to extend deadlines[0.1].	0.1	\$ 725.00	\$ 72.50
9/26/2019	JRM	Reviewed correspondence and memoranda regarding document production[0.5]; worked on strategy for discovery[0.3].	0.8	\$ 725.00	\$ 580.00
9/27/2019	JRM	Analyzed outstanding discovery issues and class cert deadline issues[0.4]; email correspondence regarding same[0.1].	0.5	\$ 725.00	\$ 362.50
9/28/2019	JRM	Worked on meet and confer letter[1.5].	1.5	\$ 725.00	\$ 1,087.50
10/3/2019	JRM	Worked on 30(b)(6) notice[0.5]; worked on 30(b)(6) deposition notice[3.5].	4	\$ 725.00	\$ 2,900.00
10/4/2019	JRM	Reviewed memorandum regarding summary judgment opposition[0.2]; revised 30(b)(6) deposition notice[0.3]; followed up on deposition notices[0.2].	0.7	\$ 725.00	\$ 507.50
10/9/2019	JRM	Worked on agenda for meet and confer[0.5].	0.5	\$ 725.00	\$ 362.50
10/10/2019	JRM	Drafted agenda for meeting[0.2]; telephone conference with opposing counsel regarding discovery meet and confer[0.6]; followed up with same[0.6]; analyzed issues regarding call data[0.3].	1.7	\$ 725.00	\$ 1,232.50
10/21/2019	JRM	Analyzed search term issues[0.1]; continued to work on same[0.3].	0.4	\$ 725.00	\$ 290.00
10/24/2019	JRM	Email correspondence regarding discovery issues[0.2].	0.2	\$ 725.00	\$ 145.00
11/6/2019	JRM	Analyzed issues regarding discovery status[0.3].	0.3	\$ 725.00	\$ 217.50
12/5/2019	JRM	Email correspondence regarding outstanding discovery issues[0.3].	0.3	\$ 725.00	\$ 217.50
1/14/2020	JRM	Reviewed third party discovery responses[0.1]; reviewed email correspondence regarding third party discovery[0.1]; telephone conference with Mr. Paronich regarding same[0.2]; prepared for team meeting[0.8]; telephone conference with team regarding discovery strategy[1.0]; email to Ms. Francis regarding discovery[0.1]; email to Ms. Francis regarding depositions[0.1].	2.4	\$ 725.00	\$ 1,740.00
1/15/2020	JRM	Analyzed data issues[0.2]; worked on discovery issues[1.0].	1.2	\$ 725.00	\$ 870.00
1/17/2020	JRM	Prepared for meet and confer[0.4]; attended meet and confer[0.5]; followed up with same[0.3].	1.2	\$ 725.00	\$ 870.00
1/23/2020	JRM	Email correspondence regarding discovery and depositions[0.2].	0.2	\$ 725.00	\$ 145.00
1/27/2020	JRM	Prepared for meet and confer[0.1]; attended meet and confer[0.1]; followed up with same[0.2]; reviewed Josh grant draft declaration[0.1].	0.5	\$ 725.00	\$ 362.50
2/4/2020	JRM	Reviewed subpoena packet[0.2]; email correspondence regarding same[0.2]; analyzed outstanding discovery issues[0.3].	0.7	\$ 725.00	\$ 507.50
2/5/2020	JRM	Telephone conference with Mr. Hansen regarding retention[0.3]; followed up regarding same[0.2].	0.5	\$ 725.00	\$ 362.50
2/7/2020	JRM	Reviewed documents and strategized about third-party discovery[1.1].	1.1	\$ 725.00	\$ 797.50
2/11/2020	JRM	Researched decisions involving soundboard technology[0.5]; reviewed declaration[0.1]; email correspondence regarding same[0.1]; worked on scheduling depositions including call to Ms. Francis and follow up email[0.1].	0.8	\$ 725.00	\$ 580.00
2/13/2020	JRM	Email correspondence regarding depositions[0.1].	0.1	\$ 725.00	\$ 72.50
2/18/2020	JRM	Telephone conference with Mr. Paronich regarding Prospects DM subpoena response[0.5]; reviewed documents[0.5].	1	\$ 725.00	\$ 725.00
2/26/2020	JRM	Strategized regarding transfer records[0.3]; telephone conference with Mr. Paronich regarding same[0.2]; analyzed summary of new documents[0.5]; reviewed and revised 30(b)(6) notice[0.2]; reviewed draft declaration[0.1]; email correspondence regarding same[0.1]; researched additional testimony that Mr. Grant has submitted in related litigation[1.0]; continued to review cases involving Prospects DM[0.5].	2.9	\$ 725.00	\$ 2,102.50
2/27/2020	JRM	Reviewed and commented on draft Grant declaration[0.3]; email correspondence regarding same[0.1]; reviewed documents to prepare for meet and confer and depositions[1.1]; continued to work on same[1.2]; continued to work on same[0.5]; telephone conference with opposing counsel regarding redactions[0.5]; followed up with same[0.2]; reviewed Yodel documents[0.6].	4.5	\$ 725.00	\$ 3,262.50
3/2/2020	JRM	Worked on deposition preparation[0.3].	0.3	\$ 725.00	\$ 217.50
3/3/2020	JRM	Email correspondence with potential expert[0.2]; telephone conference with potential expert[0.4].	0.6	\$ 725.00	\$ 435.00

Date	Timekeeper	Narrative	Units	Rate	Value
3/5/2020	JRM	Followed up on discovery issues[0.7]; drafted stipulation regarding calling records[0.5].	1.2	\$ 725.00	\$ 870.00
3/9/2020	JRM	Telephone conference with Eric Allen regarding subpoena[0.2].	0.2	\$ 725.00	\$ 145.00
3/10/2020	JRM	Followed up on Turner matter[0.2]; followed up with opposing counsel regarding redactions[0.1]; followed up with Mr. Hansen regarding records and dialer information[0.2]; reviewed revisions to stipulation[0.1]; analyzed issues regarding same[0.2].	0.8	\$ 725.00	\$ 580.00
3/16/2020	JRM	Analyzed issues regarding data overlap[0.1]; followed up with same[0.1]; worked on discovery issues[0.5]; worked on Swindle deposition outline[2.0]; email correspondence regarding data issues[0.1]; followed up with same[0.1].	2.9	\$ 725.00	\$ 2,102.50
3/18/2020	JRM	Reviewed redacted documents[0.1]; followed up regarding same[0.1]; followed up regarding depositions[0.1].	0.3	\$ 725.00	\$ 217.50
3/20/2020	JRM	Reviewed draft expert report and email correspondence regarding same[0.5]; analyzed issues relating to deposition[0.2].	0.7	\$ 725.00	\$ 507.50
3/21/2020	JRM	Telephone conference with Mr. Hansen regarding expert report[0.8].	0.8	\$ 725.00	\$ 580.00
3/23/2020	JRM	Telephone call from Mr. Hansen regarding expert work[0.3]; followed up with same[0.2]; reviewed revised draft report[0.1]; followed up with same[0.1].	0.7	\$ 725.00	\$ 507.50
3/24/2020	JRM	Worked on expert report[1.7]; continued to work on same[0.7]; reviewed letter to PillPack[0.1]; email correspondence regarding same[0.1].	2.6	\$ 725.00	\$ 1,885.00
3/25/2020	JRM	Continued to review and revise expert report[2.5]; telephone conference with Mr. Hansen regarding same[0.2]; continued to work on expert report[2.2].	4.9	\$ 725.00	\$ 3,552.50
3/26/2020	JRM	Worked on expert report[2.0]; telephone conference with Ms. Verkhoskaya regarding expert report[0.8]; followed up with same[0.3]; continued to work on expert issues[0.7].	3.8	\$ 725.00	\$ 2,755.00
3/27/2020	JRM	Analyzed issues regarding expert report[0.2].	0.2	\$ 725.00	\$ 145.00
3/31/2020	JRM	Followed up regarding expert reports[0.2]; telephone call with Mr. Hansen regarding report[0.1]; reviewed documents to prepare for Swindle deposition[1.7]; worked on expert reports[1.2]; continued to work on same[1.0]; reviewed documents in preparation for depositions[0.7]; continued to work on same[0.4]; continued to work on same[0.3].	5.6	\$ 725.00	\$ 4,060.00
4/1/2020	JRM	Reviewed and revised draft expert report[0.3]; continued to work on expert reports[0.3]; continued to work on same[1.0]; continued to work on same[0.2].	1.8	\$ 725.00	\$ 1,305.00
4/2/2020	JRM	Telephone conference regarding objections to depositions[0.8]; followed up with same[0.3].	1.1	\$ 725.00	\$ 797.50
4/8/2020	JRM	Worked on discovery issues[0.2].	0.2	\$ 725.00	\$ 145.00
4/10/2020	JRM	Followed up with deposition dates[0.2]; telephone call from Ms. Rainwater regarding deposition scheduling[0.1]; followed up with same[0.1].	0.4	\$ 725.00	\$ 290.00
4/14/2020	JRM	Reviewed subpoenas[0.3]; email correspondence regarding same[0.1].	0.4	\$ 725.00	\$ 290.00
4/15/2020	JRM	Prepared for meet and confer on remote depositions[0.3]; attended meet and confer[0.3]; continued to analyze remote deposition issue and prepare notices[1.0]; researched remote deposition issue[0.5]; worked on discovery responses[0.8].	2.9	\$ 725.00	\$ 2,102.50
4/16/2020	JRM	Worked on subpoena response[2.3]; continued to work on same[1.0]; worked on discovery responses[0.8]; worked on subpoena objections[1.5].	5.6	\$ 725.00	\$ 4,060.00
4/17/2020	JRM	Drafted meet and confer letter regarding depositions[1.2]; continued to revise letter[0.2]; email correspondence regarding deposition scheduling[0.1]; followed up regarding same[0.1]; prepared for depositions[1.2]; reviewed and revised discovery requests[1.2].	4	\$ 725.00	\$ 2,900.00
4/20/2020	JRM	Worked on expert subpoena response[1.0].	1	\$ 725.00	\$ 725.00
4/21/2020	JRM	Telephone conference with Mr. Hansen regarding subpoena response[0.4]; worked on subpoena response[0.9]; reviewed discovery responses[0.1]; continued to analyze issues regarding same[0.7]; continued to analyze discovery issues[0.5]; telephone conference with Ms. Verkhovskaya regarding expert work[0.3]; continued to work on subpoena response[0.5].	3.4	\$ 725.00	\$ 2,465.00
4/22/2020	JRM	Revised discovery responses[0.4]; worked on discovery issues[0.2]; worked on gathering documents and responding to subpoena to experts[1.5].	2.1	\$ 725.00	\$ 1,522.50
4/23/2020	JRM	Worked on expert production[0.7]; telephone conference with Mr. Payson regarding data[0.2]; followed up with same[0.2].	1.1	\$ 725.00	\$ 797.50

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4/24/2020	JRM	Worked on subpoena response[1.0]; continued to work on same[0.8].	1.8	\$ 725.00	\$ 1,305.00
4/28/2020	JRM	Worked on expert discovery issues[1.2]; continued to work on same[0.5].	1.7	\$ 725.00	\$ 1,232.50
4/29/2020	JRM	Worked on expert discovery issues[0.5]; telephone conference with Ms. Verkhovskaya regarding same[0.2]; followed up with same[0.9].	1.6	\$ 725.00	\$ 1,160.00
4/30/2020	JRM	Prepared for Hansen deposition[0.2]; continued to work on same[3.0].	3.2	\$ 725.00	\$ 2,320.00
5/1/2020	JRM	Prepared for Hansen deposition[1.0]; attended Hansen deposition[8.5]; followed up with same[0.7].	10.2	\$ 725.00	\$ 7,395.00
5/2/2020	JRM	Followed up with PillPack deposition issues[0.5].	0.5	\$ 725.00	\$ 362.50
5/4/2020	JRM	Telephone conference with Ms. Verkhovskaya regarding expert report[0.2]; followed up regarding same[0.3]; worked on scheduling and response to subpoena issues[0.5]; analyzed expert issues[0.2]; worked on subpoena objections[0.2]; worked on expert subpoena issues[0.4]; followed up on expert issues[0.3].	2.1	\$ 725.00	\$ 1,522.50
5/7/2020	JRM	Email correspondence regarding expert work[0.1].	0.1	\$ 725.00	\$ 72.50
5/8/2020	JRM	Telephone conference regarding expert report[0.8]; followed up with same[0.1].	0.9	\$ 725.00	\$ 652.50
5/11/2020	JRM	Analyzed issues regarding supplemental discovery responses for Ms. Verkhovskaya[0.3]; telephone conference with Ms. Verkhovskaya regarding expert work[0.5]; followed up with same[0.2].	1	\$ 725.00	\$ 725.00
5/12/2020	JRM	Worked on discovery supplementation[0.5]; continued to work on same[0.5]; analyzed issues regarding expert NDNC analysis[0.4].	1.4	\$ 725.00	\$ 1,015.00
5/13/2020	JRM	Telephone conference with Mr. Paronich regarding supplemental expert report[0.2]; followed up with same[0.1]; worked on discovery supplementation[0.3]; continued to work on same[0.5].	1.1	\$ 725.00	\$ 797.50
5/14/2020	JRM	Prepared for meet and confer[0.2]; attended meet and confer regarding Mr. Williams's responses[0.5]; followed up with same[0.5].	1.2	\$ 725.00	\$ 870.00
5/15/2020	JRM	Worked on discovery supplement[1.3].	1.3	\$ 725.00	\$ 942.50
5/16/2020	JRM	Prepared for expert prep session[1.5]; worked on supplemental discovery responses[1.0].	2.5	\$ 725.00	\$ 1,812.50
5/18/2020	JRM	Analyzed consent issues for depositions[0.5]; continued to review documents to prepare for depositions[1.0]; team call regarding same[1.0].	2.5	\$ 725.00	\$ 1,812.50
5/19/2020	JRM	Telephone conference with Mr. Paronich regarding case strategy[0.3]; followed up with same[0.1].	0.4	\$ 725.00	\$ 290.00
5/20/2020	JRM	Telephone conference with Mr. Paronich regarding expert deposition[0.1]; telephone conference with Mr. Williams regarding supplemental discovery responses[1.2].	1.3	\$ 725.00	\$ 942.50
5/22/2020	JRM	Telephone conference with team to discuss deposition preparation[1.0].	1	\$ 725.00	\$ 725.00
5/25/2020	JRM	Worked on supplemental discovery responses[1.5].	1.5	\$ 725.00	\$ 1,087.50
5/26/2020	JRM	Worked on supplemental discovery responses[0.3]; analyzed issues relating to upcoming depositions[0.2].	0.5	\$ 725.00	\$ 362.50
5/27/2020	JRM	Worked on supplemental discovery responses[0.5]; continued to work on same[0.5]; telephone conference regarding deposition preparation[0.5]; continued to work on deposition prep[2.7].	4.2	\$ 725.00	\$ 3,045.00
5/28/2020	JRM	Analyzed issues regarding 30(b)(6) deposition[0.2]; followed up on same[0.2]; revised motion to enforce[0.5]; worked on supplemental subpoena to AT&T[0.7]; reviewed documents for supplemental responses[0.9]; prepared for depositions[2.8]; continued to work on same[0.3].	5.6	\$ 725.00	\$ 4,060.00
5/29/2020	JRM	Reviewed documents in preparation for deposition[2.5]; attended deposition of Mr. Swindle[8.8]; followed up with same[0.5].	11.8	\$ 725.00	\$ 8,555.00
5/30/2020	JRM	Worked on McKnight outline[3.5].	3.5	\$ 725.00	\$ 2,537.50
5/31/2020	JRM	Prepared for depositions[3.7].	3.7	\$ 725.00	\$ 2,682.50
6/1/2020	JRM	Reviewed and revised Seastrand outline[0.5]; researched vicarious liability issues[1.0]; attended team call regarding deposition strategy[1.0]; reviewed expert reports and continued to prepare for depositions[1.2].	3.7	\$ 725.00	\$ 2,682.50
6/2/2020	JRM	Attended deposition of Jesse Seastrand[8.0]; followed up with same[0.5]; worked on Ranneberg outline[1.0].	9.5	\$ 725.00	\$ 6,887.50
6/3/2020	JRM	Prepared for McKnight deposition[2.2]; attended McKnight deposition[6.0]; followed up with same[0.3].	8.5	\$ 725.00	\$ 6,162.50
6/4/2020	JRM	Email correspondence regarding next steps[0.2].	0.2	\$ 725.00	\$ 145.00
6/4/2020	JRM	Analyzed issues regarding deposition and subpoena strategy[1.2].	1.2	\$ 725.00	\$ 870.00

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6/5/2020	JRM	Email correspondence regarding document production[0.1]; attended Ranneberg deposition[6.5]; followed up with same[0.5].	7.1	\$ 725.00	\$ 5,147.50
6/8/2020	JRM	Worked on deposition follow up[0.9]; reviewed and outlined expert report[1.5]; telephone conference with Ms. Verkhovskaya regarding rebuttal report[0.5]; followed up with same[0.2]; telephone conference with Mr. Hansen regarding rebuttal report[0.4]; continued to review Defendant's expert reports[1.4].	4.9	\$ 725.00	\$ 3,552.50
6/9/2020	JRM	Worked on supplemental discovery responses[0.5]; reviewed documents to produce to defendant with supplemental production[1.0].	1.5	\$ 725.00	\$ 1,087.50
6/10/2020	JRM	Analyzed issues regarding supplemental discovery responses[0.2].	0.2	\$ 725.00	\$ 145.00
6/11/2020	JRM	Telephone call from Mr. Paronich regarding Prospects follow up[0.2]; worked on expert issues[0.4].	0.6	\$ 725.00	\$ 435.00
6/15/2020	JRM	Telephone conference with team regarding expert reports[1.0].	1	\$ 725.00	\$ 725.00
6/16/2020	JRM	Reviewed expert rebuttal reports and analyzed issues regarding same[0.5].	0.5	\$ 725.00	\$ 362.50
6/19/2020	JRM	Reviewed expert declaration[0.3]; analyzed issues regarding same[0.3].	0.6	\$ 725.00	\$ 435.00
6/23/2020	JRM	Analyzed issues regarding next steps[0.5].	0.5	\$ 725.00	\$ 362.50
7/2/2020	JRM	Analyzed issues regarding potential expert deposition[0.3].	0.3	\$ 725.00	\$ 217.50
7/15/2020	JRM	Analyzed issues regarding Andersen deposition[0.5]; continued to analyze same[1.7].	2.2	\$ 725.00	\$ 1,595.00
7/16/2020	JRM	Prepared for Anderson deposition[1.2]; continued to work on same[1.0]; continued to work on same[2.5]; continued to work on same[2.3].	7	\$ 725.00	\$ 5,075.00
7/17/2020	JRM	Prepared for Andersn deposition[0.5]; attended Anderson deposition[5.2]; followed up with same[0.3].	6	\$ 725.00	\$ 4,350.00
7/20/2020	JRM	Analyzed class certification issues[0.3].	0.3	\$ 725.00	\$ 217.50
7/21/2020	JRM	Reviewed class certification motion[0.5]; analyzed issues regarding same[1.7]; telephone conference with co-counsel regarding deposition preparation[0.7]; prepared for class rep deposition[0.8].	3.7	\$ 725.00	\$ 2,682.50
7/22/2020	JRM	Worked on class certification motion[3.0]; continued to work on same[0.7].	3.7	\$ 725.00	\$ 2,682.50
7/23/2020	JRM	Analyzed issues relating to class certification[0.5]; continued to work on same[1.0]; continued to work on same[2.0]; continued to work on same[2.5]; telephone conference with Mr. Williams to prepare for deposition[1.4]; continued to work on class certification issues[0.2]; outlined Anderson deposition[1.2]; reviewed and revised class certification motion[0.5].	9.3	\$ 725.00	\$ 6,742.50
7/24/2020	JRM	Worked on class certification motion[3.2]; continued to work on same[0.4]; continued to work on same[3.8]; analyzed [REDACTED][2.2].	9.6	\$ 725.00	\$ 6,960.00
7/27/2020	JRM	Email correspondence regarding potentially confidential information[0.2].	0.2	\$ 725.00	\$ 145.00
7/29/2020	JRM	Prepared for deposition[0.5]; defended Mr. Williams's deposition[3.5]; followed up with same[0.7].	4.7	\$ 725.00	\$ 3,407.50
8/3/2020	JRM	Email correspondence regarding Castro deposition[0.1].	0.1	\$ 725.00	\$ 72.50
8/7/2020	JRM	Telephone conference with Mr. Smith regarding discovery responses[0.2]; followed up with same[0.1].	0.3	\$ 725.00	\$ 217.50
8/13/2020	JRM	Analyzed discovery issues[0.5].	0.5	\$ 725.00	\$ 362.50
8/14/2020	JRM	Reviewed Nexxa document production[0.2]; telephone conference with CEG regarding same[0.1].	0.3	\$ 725.00	\$ 217.50
8/18/2020	JRM	Telephone conference with CEG regarding data processors[0.4].	0.4	\$ 725.00	\$ 290.00
8/20/2020	JRM	Email correspondence regarding Prospects DM deposition[0.1]; worked on Exhibit A to deposition subpoena[1.0].	1.1	\$ 725.00	\$ 797.50
8/21/2020	JRM	Reviewed deposition excerpts[0.1]; email correspondence regarding confidentiality designation[0.1]; prepared for Prospects DM deposition[0.2]; continued to analyze issues relating to Prospects DM deposition[0.5]; followed up with same[0.3].	1.2	\$ 725.00	\$ 870.00
8/24/2020	JRM	Reviewed and outlined [REDACTED][3.3]; worked on outline for class certification reply brief[4.3].	7.6	\$ 725.00	\$ 5,510.00
8/25/2020	JRM	Worked on class certification reply brief[7.5].	7.5	\$ 725.00	\$ 5,437.50
9/2/2020	JRM	Analyzed issues relating to motion to supplement[0.7]; coninued to work on same[0.2]; worked on opposition to motion to supplement[5.5]; continued to work on same[2.5].	8.9	\$ 725.00	\$ 6,452.50
9/3/2020	JRM	Worked on class certification reply[3.8]; continued to work on same[5.0]; worked on response to motion to supplement[1.5].	10.3	\$ 725.00	\$ 7,467.50

Date	Timekeeper	Narrative	Units	Rate	Value
9/4/2020	JRM	Worked on class certification reply and supporting documents[12.2].	12.2	\$ 725.00	\$ 8,845.00
9/7/2020	JRM	Revised class certification reply brief[0.2]; worked on opposition to summary judgment[2.5]; continued to work on same[1.2].	3.9	\$ 725.00	\$ 2,827.50
9/9/2020	JRM	Worked on response to summary judgment[2.5]; continued to work on same[[0.7]; continued to work on same[4.7].	7.9	\$ 725.00	\$ 5,727.50
9/10/2020	JRM	Worked on opposition to motion to supplement[1.5]; continued to work on same[2.0]; continued to work on same[2.7].	6.2	\$ 725.00	\$ 4,495.00
9/11/2020	JRM	Worked on response to motion to supplement[2.0]; continued to work on same[1.0]; worked on Exhibit As to deposition and document subpoenas to Fluent[1.5]; continued to work on same[0.5].	5	\$ 725.00	\$ 3,625.00
9/14/2020	JRM	Worked on response to motion to supplement[3.8]; continued to work on same[1.3]; continued to work on same[4.5].	9.6	\$ 725.00	\$ 6,960.00
9/15/2020	JRM	Reviewed documents[1.0]; prepared for meet and confer[0.5]; attended meet and confer[0.7]; followed up with same[0.5]; worked on summary judgment opposition[2.2].	4.9	\$ 725.00	\$ 3,552.50
9/16/2020	JRM	Worked on summary judgment opposition[7.9].	7.9	\$ 725.00	\$ 5,727.50
9/17/2020	JRM	Worked on PillPack summary judgment opposition[8.5].	8.5	\$ 725.00	\$ 6,162.50
9/18/2020	JRM	Worked on opposition to summary judgment[8.5].	8.5	\$ 725.00	\$ 6,162.50
9/20/2020	JRM	Worked on summary judgment opposition[4.0].	4	\$ 725.00	\$ 2,900.00
9/21/2020	JRM	Worked on opposition to summary judgment[4.5]; continued to work on same[2.8]; continued to work on same[2.8].	10.1	\$ 725.00	\$ 7,322.50
9/28/2020	JRM	Prepared for Fluent deposition[3.5]; continued to work on same[0.6].	4.1	\$ 725.00	\$ 2,972.50
9/29/2020	JRM	Researched Fluent trade names[0.4]; email correspondence regarding same[0.1]; worked on deposition outline[5.2].	5.7	\$ 725.00	\$ 4,132.50
9/30/2020	JRM	Email correspondence regarding deposition subpoenas[0.3]; analyzed issues relating to Fluent[1.0]; continued to work on same[0.6]; analyzed issues relating to [REDACTED][0.4]; worked on deposition outline[0.8].	3.1	\$ 725.00	\$ 2,247.50
10/1/2020	JRM	Telephone conference regarding [REDACTED][0.7].	0.7	\$ 725.00	\$ 507.50
10/5/2020	JRM	Worked on deposition outline[3.5]; continued to work on same[0.8]; continued to work on same[1.5].	5.8	\$ 725.00	\$ 4,205.00
10/6/2020	JRM	Reviewed and revised reply in support of motion to seal[0.1].	0.1	\$ 725.00	\$ 72.50
10/28/2020	JRM	Telephone conference regarding [REDACTED][0.2]; followed up with same[0.3]; email to team regarding same[0.2].	0.7	\$ 725.00	\$ 507.50
11/9/2020	JRM	Telephone conference regarding call recordings and slack[0.5].	0.5	\$ 725.00	\$ 362.50
11/23/2020	JRM	Analyzed issues regarding data produced by Fluent[0.4].	0.4	\$ 725.00	\$ 290.00
11/30/2020	JRM	Analyzed issues regarding motion to supplement[0.2].	0.2	\$ 725.00	\$ 145.00
12/21/2020	JRM	Reviewed and revised request to supplement[0.3].	0.3	\$ 725.00	\$ 217.50
12/22/2020	JRM	Reviewed documents in preparation for filing[0.5].	0.5	\$ 725.00	\$ 362.50
1/8/2021	JRM	Reviewed order denying summary judgment and followed up with same[0.7].	0.7	\$ 725.00	\$ 507.50
1/13/2021	JRM	Reviewed and revised reply briefs in support of motions to supplement and to seal[0.5]; analyzed issues regarding same[0.4]; reviewed revised draft and sent email regarding same[0.1].	1	\$ 725.00	\$ 725.00
1/14/2021	JRM	Reviewed and revised reply brief[0.5]; continued to work on same[0.2]; reviewed court's minute order on class certification[0.1]; analyzed issues regarding same[0.2].	1	\$ 725.00	\$ 725.00
1/15/2021	JRM	Analyzed issues relating to court's request for supplemental briefing[1.5].	1.5	\$ 725.00	\$ 1,087.50
1/21/2021	JRM	Analyzed issues regarding [REDACTED][1.5]; continued to work on same[4.3].	5.8	\$ 725.00	\$ 4,205.00
1/22/2021	JRM	Worked on joint status report and schedule[1.0]; continued to work on same[1.2].	2.2	\$ 725.00	\$ 1,595.00
1/25/2021	JRM	Analyzed issues relating to proposed schedule[0.7]; analyzed records custodian issue[0.5].	1.2	\$ 725.00	\$ 870.00
1/26/2021	JRM	Worked on case schedule and proposed status report[0.5].	0.5	\$ 725.00	\$ 362.50
1/27/2021	JRM	Reviewed authority on consent to receive calls from a third party[0.5].	0.5	\$ 725.00	\$ 362.50
1/28/2021	JRM	Reviewed changes to proposed schedule[0.5]; followed up with same[1.0]; analyzed issues relating to consent[0.5]; met and conferred regarding proposed schedule[0.4]; followed up with same[0.4].	2.8	\$ 725.00	\$ 2,030.00

Date	Timekeeper	Narrative	Units	Rate	Value
1/29/2021	JRM	Worked on JSR[1.0]; worked on supplemental submission[0.7]; continued to work on same[1.0]; telephone call from Ms. Verkhovskaya regarding status[0.2]; analyzed issues on supplemental submission in support of class certification[2.1].	5	\$ 725.00	\$ 3,625.00
2/1/2021	JRM	Analyzed issues regarding supplemental motion[0.2]; revised JSR[0.1]; analyzed consent issue[1.3]; reviewed new McCurley decision and analyzed issues regarding same[1.9]; reviewed deposition testimony regarding dbas[2.1].	5.6	\$ 725.00	\$ 4,060.00
2/2/2021	JRM	Analyzed consent issues[2.2]; analyzed issues relating to supplemental brief[0.7].	2.9	\$ 725.00	\$ 2,102.50
2/3/2021	JRM	Reviewed and revised supplemental submission[1.1]; analyzed issues regarding same[0.3]; worked on revising supplemental submission[3.5].	4.9	\$ 725.00	\$ 3,552.50
2/3/2021	JRM	Reviewed and revised brief[0.2].	0.2	\$ 725.00	\$ 145.00
2/4/2021	JRM	Worked on supplemental brief on consent[0.8].	0.8	\$ 725.00	\$ 580.00
2/5/2021	JRM	Worked on motion to supplement[0.5].	0.5	\$ 725.00	\$ 362.50
2/10/2021	JRM	Reviewed defendant's supplemental brief[0.3].	0.3	\$ 725.00	\$ 217.50
2/12/2021	JRM	Reviewed class certification order and analyzed issues regarding same[2.0]; continued to analyze issues regarding same[0.3].	2.3	\$ 725.00	\$ 1,667.50
2/15/2021	JRM	Reviewed and revised preservation letter[0.2].	0.2	\$ 725.00	\$ 145.00
2/16/2021	JRM	Revised preservation letter[0.1]; analyzed notice issues[1.5]; telephone conference with potential notice provider[0.2]; followed up with same[0.3]; email correspondence with potential class notice administrator regarding bid[0.3].	2.4	\$ 725.00	\$ 1,740.00
2/17/2021	JRM	Reviewed recent notice order[0.2]; analyzed issues regarding same[0.8].	1	\$ 725.00	\$ 725.00
2/22/2021	JRM	Worked on notice plan[1.0]; continued to work on same[0.7].	1.7	\$ 725.00	\$ 1,232.50
2/23/2021	JRM	Worked on notice issues[0.5]; continued to work on same[1.0]; continued to work on same[0.5]; continued to work on same[2.2].	4.2	\$ 725.00	\$ 3,045.00
2/24/2021	JRM	Telephone conference with P&N regarding class notice[0.5]; followed up with same[0.1].	0.6	\$ 725.00	\$ 435.00
2/25/2021	JRM	Worked on class notices[0.7].	0.7	\$ 725.00	\$ 507.50
2/26/2021	JRM	Email correspondence regarding notice[0.1]; analyzed issues regarding same[0.3]; continued to work on same[2.3].	2.7	\$ 725.00	\$ 1,957.50
3/1/2021	JRM	Revised proposed notice plan[0.5]; evaluated notice bids[0.8].	1.3	\$ 725.00	\$ 942.50
3/2/2021	JRM	Reviewed order on reconsideration[0.1]; analyzed deadline for 26(f)[0.2]; followed up with same[0.2]; worked on notice issues[0.4].	0.9	\$ 725.00	\$ 652.50
3/4/2021	JRM	Analyzed notice issue[0.9].	0.9	\$ 725.00	\$ 652.50
3/8/2021	JRM	Revised notice plan[1.0].	1	\$ 725.00	\$ 725.00
3/9/2021	JRM	Analyzed issues relating to notice plan[0.2]; revised notice plan[0.5]; revised Azari declaration[0.5]; followed up with same[0.1]; continued to work on notice plan[0.6].	1.9	\$ 725.00	\$ 1,377.50
3/10/2021	JRM	Reviewed and revised press release[0.3]; followed up with same[0.2]; worked on notice plan and draft notices[1.5]; continued to work on notice plan[0.4]; continued to work on same[0.8]; continued to work on same[0.2].	3.4	\$ 725.00	\$ 2,465.00
3/11/2021	JRM	Worked on notice plan[0.9]; continued to work on same[0.2]; worked on notice issues[1.2]; continued to work on same[1.3]; continued to work on same[0.5].	4.1	\$ 725.00	\$ 2,972.50
3/12/2021	JRM	Analyzed class identification issues[0.4]; worked on notice plan[0.5]; continued to work on notice plan[0.5].	1.4	\$ 725.00	\$ 1,015.00
3/15/2021	JRM	Reviewed lead id list and email correspondence regarding same[0.1].	0.1	\$ 725.00	\$ 72.50
3/17/2021	JRM	Analyzed issues regarding case strategy and next steps[0.2].	0.2	\$ 725.00	\$ 145.00
3/29/2021	JRM	Worked on notice reply[2.2]; continued to work on notice issues[0.7].	2.9	\$ 725.00	\$ 2,102.50
3/30/2021	JRM	Worked on reply to notice plan[0.5]; continued to work on same[1.2]; telephone conference with team regarding same[0.3]; continued to work on reply[5.1].	7.1	\$ 725.00	\$ 5,147.50
3/31/2021	JRM	Worked on reply brief[2.0]; continued to work on same[3.5].	5.5	\$ 725.00	\$ 3,987.50
4/1/2021	JRM	Continued to work on reply[3.2]; continued to work on same[2.0]; continued to work on same[0.4].	5.6	\$ 725.00	\$ 4,060.00

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4/2/2021	JRM	Telephone conference with team to strategize about notice and further discovery[0.3]; followed up with same[0.2]; worked on reply brief and supporting documents[4.2]; continued to work on same[2.0].	6.7	\$ 725.00	\$ 4,857.50
4/5/2021	JRM	Worked on discovery follow up issues[0.5].	0.5	\$ 725.00	\$ 362.50
4/6/2021	JRM	Reviewed minute order[0.1]; followed up regarding same[0.9].	1	\$ 725.00	\$ 725.00
4/7/2021	JRM	Analyzed issues regarding status report[0.3]; email correspondence regarding same[0.2].	0.5	\$ 725.00	\$ 362.50
4/8/2021	JRM	Analyzed issues relating to Little Brook subpoena response[0.4].	0.4	\$ 725.00	\$ 290.00
4/9/2021	JRM	Analyzed Little Brook subpoena response[1.0]; continued to analyze discovery issues[0.7].	1.7	\$ 725.00	\$ 1,232.50
4/13/2021	JRM	Worked on issues relating to third party discovery[0.8]; telephone conference regarding Yodel subpoena[0.2]; telephone conference regarding strategy for merits discovery[1.0].	2	\$ 725.00	\$ 1,450.00
4/16/2021	JRM	Prepared for meet and confer[0.5]; attended meet and confer[0.5]; followed up with same[0.3]; continued to work on same[0.4].	1.7	\$ 725.00	\$ 1,232.50
4/19/2021	JRM	Drafted joint status report[1.1]; followed up on third party discovery issues[0.5]; revised motion to compel[0.3].	1.9	\$ 725.00	\$ 1,377.50
4/20/2021	JRM	Worked on third party discovery issues and joint status report[0.3].	0.3	\$ 725.00	\$ 217.50
4/21/2021	JRM	Analyzed data issues for status report[1.5]; worked on joint status report[1.1]; revised status report[2.5]; email to counsel regarding same[0.1].	5.2	\$ 725.00	\$ 3,770.00
4/23/2021	JRM	Worked on joint status report[2.8]; continued to work on same[0.3]; email correspondence regarding draft[0.2].	3.3	\$ 725.00	\$ 2,392.50
4/26/2021	JRM	Reviewed supplemental privilege log[0.1].	0.1	\$ 725.00	\$ 72.50
4/27/2021	JRM	Analyzed issues relating to motion to amend class definition[0.3].	0.3	\$ 725.00	\$ 217.50
4/28/2021	JRM	Analyzed issues regarding latest Yodel production[0.5]; continued to analyze issues regarding same[0.7]; continued to work on same[2.5].	3.7	\$ 725.00	\$ 2,682.50
5/3/2021	JRM	Reviewed latest production of documents[0.6]; analyzed discovery issues[0.2]; analyzed issues relating to discovery from Yodel[0.3].	1.1	\$ 725.00	\$ 797.50
5/4/2021	JRM	Analyzed issues regarding subpoena responses and enforcement action[0.2].	0.2	\$ 725.00	\$ 145.00
5/7/2021	JRM	Analyzed issues regarding Yodel subpoena response[0.3].	0.3	\$ 725.00	\$ 217.50
5/10/2021	JRM	Email correspondence regarding subpoenas to Yodel and Prospects[0.4]; continued to analyze issues regarding same[0.5]; continued to work on same[0.3]; analyzed issues relating to Yodel and Prospects data[1.1]; continued to analyze issues relating to source of Prospects leads[2.2]; analyzed issues regarding same[0.2]; continued to work on same[1.1].	5.8	\$ 725.00	\$ 4,205.00
5/11/2021	JRM	Analyzed issues regarding Yodel's subpoena response[0.2].	0.2	\$ 725.00	\$ 145.00
5/12/2021	JRM	Analyzed issues regarding Yodel data[0.8].	0.8	\$ 725.00	\$ 580.00
5/14/2021	JRM	Telephone conference with co-counsel regarding subpoena follow up[0.5]; analyzed issues regarding same[1.5]; continued to work on subpoena follow up issues[1.0]; continued to work on same[0.6].	3.6	\$ 725.00	\$ 2,610.00
5/17/2021	JRM	Analyzed issues regarding subpoena response[0.3]; worked on discovery issues[1.0]; followed up on same[0.5].	1.8	\$ 725.00	\$ 1,305.00
5/18/2021	JRM	Analyzed data issues[0.3].	0.3	\$ 725.00	\$ 217.50
5/24/2021	JRM	Analyzed issues for joint status report[0.2]; continued to work on same[0.7]; worked on status report[1.0]; analyzed issues relating to subpoena follow up[0.2]; analyzed issues relating to joint status report[1.2].	3.3	\$ 725.00	\$ 2,392.50
5/25/2021	JRM	Worked on supplemental production of documents relating to subpoenas[0.5]; worked on draft joint status report[2.7].	3.2	\$ 725.00	\$ 2,320.00
5/26/2021	JRM	Reviewed draft joint status report[0.1]; analyzed issues regarding numbers for status report[0.2]; continued to work on same[0.1]; continued to work on same[0.5]; continued to work on joint status report[0.3]; continued to work on same[0.3]; continued to work on same[0.2].	1.7	\$ 725.00	\$ 1,232.50
6/1/2021	JRM	Telephone call from Mr. Paronich regarding subpoena response[0.1]; followed up with same[0.1]; worked on joint status report[4.2].	4.4	\$ 725.00	\$ 3,190.00

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6/2/2021	JRM	Telephone call from Mr. Paronich regarding subpoena response[0.1]; analyzed issues regarding next steps[0.8]; continued to work on same[0.1]; reviewed Josh Grant deposition transcript[0.8]; reviewed Grant declaration from McCurley[3.5]; reviewed response to motion to enforce subpoena[0.2]; analyzed issues regarding same[0.3]; continued to work on same[0.8].	6.6	\$ 725.00	\$ 4,785.00
6/3/2021	JRM	Analyzed issues relating to PillPack motion[0.3]; continued to review Mr. Grant's deposition transcript[0.5]; prepared for team call regarding Yodel subpoena enforcement action[0.3]; attended team call on Yodel subpoena enforcement action[0.7]; drafted letter to Yodel's counsel regarding potential resolution to dispute[1.1].	2.9	\$ 725.00	\$ 2,102.50
6/4/2021	JRM	Analyzed issues relating to URLs produced by Little Brook[1.0].	1	\$ 725.00	\$ 725.00
6/7/2021	JRM	Email correspondence regarding subpoena enforcement action[0.2]; analyzed issues regarding Little Brook data[0.3]; worked on motion for leave to file reply[0.2]; drafted motion for leave to file a reply[1.8]; followed up on same[0.2].	2.7	\$ 725.00	\$ 1,957.50
6/8/2021	JRM	Analyzed issues relating to opposition to motion to stay[1.0]; continued to work on same[1.4]; continued to work on same[2.4]; analyzed issues regarding same[0.5]; continued to work on same[2.2].	7.5	\$ 725.00	\$ 5,437.50
6/9/2021	JRM	Worked on opposition to motion to stay[2.8]; continued to work on same[1.7]; continued to work on same[3.2].	7.7	\$ 725.00	\$ 5,582.50
6/10/2021	JRM	Worked on opposition to motion to stay[9.2].	9.2	\$ 725.00	\$ 6,670.00
6/11/2021	JRM	Worked on opposition to motion to stay[1.5]; telephone conference with team regarding second set of interrogatories[0.6]; continued to work on response to motion to stay[1.0].	3.1	\$ 725.00	\$ 2,247.50
6/14/2021	JRM	Worked on response to motion to stay[2.3]; continued to work on same[5.2]; continued to work on same[1.0].	8.5	\$ 725.00	\$ 6,162.50
6/15/2021	JRM	Analyzed issues regarding subpoena response[0.3].	0.3	\$ 725.00	\$ 217.50
6/17/2021	JRM	Analyzed issues relating to Yodel data[0.1].	0.1	\$ 725.00	\$ 72.50
6/28/2021	JRM	Worked on discovery responses[1.5].	1.5	\$ 725.00	\$ 1,087.50
6/29/2021	JRM	Worked on interrogatory responses[0.7]; continued to analyze issues regarding interrogatory responses[1.5]; continued to work on same[5.5].	7.7	\$ 725.00	\$ 5,582.50
6/30/2021	JRM	Email correspondence regarding discovery follow up[0.2]; analyzed issues regarding class list[0.3].	0.5	\$ 725.00	\$ 362.50
7/6/2021	JRM	Worked on discovery responses[2.1]; continued to work on same[0.7]; continued to work on same[3.5].	6.3	\$ 725.00	\$ 4,567.50
7/7/2021	JRM	Worked on revised discovery responses[1.1]; reviewed order on motion to stay and analyzed issues regarding same[0.5]; reviewed privilege log and analyzed issues regarding same[0.3]; telephone conference regarding court's order and additional discovery[0.3]; analyzed issues regarding supplementation[0.5].	2.7	\$ 725.00	\$ 1,957.50
7/8/2021	JRM	Reviewed email regarding responses to second set of discovery[0.2]; telephone call from Mr. Smith regarding discovery responses[1.0]; followed up with same[0.1]; worked on discovery responses[1.0]; worked on supplemental discovery responses[1.8]; continued to work on discovery responses[0.2]; worked on discovery for notice plan[1.0].	5.3	\$ 725.00	\$ 3,842.50
7/9/2021	JRM	Continued to review Yodel deposition[1.3]; continued to work on same[0.5]; researched source of Michael Morgan lead[0.4].	2.2	\$ 725.00	\$ 1,595.00
7/12/2021	JRM	Worked on discovery responses[0.5]; continued to work on same[3.5]; continued to work on same[0.5].	4.5	\$ 725.00	\$ 3,262.50
7/19/2021	JRM	Telephone call from Mr. Paronich regarding discovery update[0.1]; followed up with same[0.1].	0.2	\$ 725.00	\$ 145.00
7/20/2021	JRM	Analyzed issues regarding Yodel deposition[0.2]; analyzed issues relating to Yodel data[0.3]; worked on deposition and document subpoena to Yodel[2.7].	3.2	\$ 725.00	\$ 2,320.00
7/21/2021	JRM	Analyzed issues relating to notice plan[0.2].	0.2	\$ 725.00	\$ 145.00
7/22/2021	JRM	Worked on notice plan[3.6]; researched Yodel dbas[0.3]; continued to work on notice plan[1.9].	5.8	\$ 725.00	\$ 4,205.00
7/26/2021	JRM	Worked on motion for notice plan[1.3]; continued to work on same[4.8].	6.1	\$ 725.00	\$ 4,422.50
7/27/2021	JRM	Worked on amended motion to approve notice plan[2.7].	2.7	\$ 725.00	\$ 1,957.50
7/28/2021	JRM	Worked on amended motion to approve notice plan[0.5]; continued to work on same[4.5].	5	\$ 725.00	\$ 3,625.00

Date	Timekeeper	Narrative	Units	Rate	Value
7/29/2021	JRM	Analyzed data issues[0.2]; reviewed and revised amended motion to approve notice plan[0.6].	0.8	\$ 725.00	\$ 580.00
8/2/2021	JRM	Worked on notice plan[0.5]; continued to work on same[0.2]; continued to work on same[1.3]; followed up on subpoena issues[0.2].	2.2	\$ 725.00	\$ 1,595.00
8/3/2021	JRM	Revised proposed notice forms[0.5]; email correspondence regarding revised notice[0.2]; worked on notice plan[0.3]; continued to work on same[0.7]; continued to work on same[0.2]; continued to work on proposed notice plan[0.9]; continued to work on notices[0.5].	3.3	\$ 725.00	\$ 2,392.50
8/4/2021	JRM	Revised notice plan[0.2]; email correspondence regarding Yodel deposition[0.1]; worked on notice plan[0.5]; analyzed issues regarding notice plan[0.5]; worked on notice plan[2.5]; continued to work on same[2.1].	5.9	\$ 725.00	\$ 4,277.50
8/5/2021	JRM	Reviewed and revised notice plan[0.2]; continued to work on same[1.0]; continued to work on same[0.5]; reviewed and revised exhibits[0.3]; drafted declaration in support of motion[1.1].	3.1	\$ 725.00	\$ 2,247.50
8/6/2021	JRM	Worked on notice plan[1.0]; continued to work on same[0.3].	1.3	\$ 725.00	\$ 942.50
8/10/2021	JRM	Prepared for Yodel deposition[0.5]; followed up regarding same[0.2]; continued to prepare for deposition[0.2].	0.9	\$ 725.00	\$ 652.50
8/11/2021	JRM	Worked on deposition preparation[0.7]; email correspondence regarding deposition scheduling[0.2]; analyzed issues regarding Yodel deposition[0.8]; analyzed issues regarding documents for deposition preparation[0.5].	2.2	\$ 725.00	\$ 1,595.00
8/12/2021	JRM	Analyzed issues regarding Yodel objections to subpoena and deposition outline[0.5].	0.5	\$ 725.00	\$ 362.50
8/19/2021	JRM	Reviewed subpoenas to lead generators[0.2]; analyzed issues regarding same[1.5]; worked on outline for Yodel deposition[3.8].	5.5	\$ 725.00	\$ 3,987.50
8/20/2021	JRM	Analyzed issues regarding Yodel deposition and reply brief[1.0].	1	\$ 725.00	\$ 725.00
8/22/2021	JRM	Worked on reply in support of notice plan[3.6].	3.6	\$ 725.00	\$ 2,610.00
8/23/2021	JRM	Worked on reply brief[0.5]; analyzed issues relating to motion to amend class definition[0.5]; drafted stipulation to extend deadline to file reply brief[1.2]; revised same[0.3]; worked on motion to modify class definition[1.2]; continued to work on same[1.8].	5.5	\$ 725.00	\$ 3,987.50
8/24/2021	JRM	Worked on motion to modify the class definition[0.4]; continued to work on same[0.3]; continued to work on same[2.9].	3.6	\$ 725.00	\$ 2,610.00
8/25/2021	JRM	Analyzed discovery issues[0.7]; followed up with same[0.2]; email correspondence regarding meet and confer[0.3].	1.2	\$ 725.00	\$ 870.00
8/30/2021	JRM	Analyzed issues regarding Yodel deposition[0.5]; reviewed discovery letter and draft response letter[0.7]; outlined issues for meet and confer[0.7]; prepared for meet and confer[0.5]; telephone conference with co-counsel regarding meet and confer[0.5]; continued to prepare for meet and confer[1.0]; telephone conference regarding meet and confer[0.5]; followed up with same[1.3]; telephone conference with client[0.5]; worked on supplemental discovery responses[0.7].	6.9	\$ 725.00	\$ 5,002.50
8/31/2021	JRM	Reviewed deposition transcripts to prepare for Yodel deposition[0.5]; continued to prepare for Yodel deposition[1.0].	1.5	\$ 725.00	\$ 1,087.50
9/1/2021	JRM	Reviewed Yodel prior testimony and briefing and analyzed issues regarding same[4.0]; prepared for Yodel deposition[1.0]; analyzed outstanding discovery[1.5]; drafted discovery requests[0.3]; drafted letter requesting supplementation[0.2]; followed up with same[0.4].	7.4	\$ 725.00	\$ 5,365.00
9/2/2021	JRM	Attended Yodel deposition of Kyle Wood[6.0]; followed up with same[0.5]; reviewed information received from client regarding devices[0.2].	6.7	\$ 725.00	\$ 4,857.50
9/3/2021	JRM	Outlined motion to modify in light of Kyle Wood deposition[2.1]; reviewed Little Brook documents and created timeline[1.5]; continued to review Little Brook documents[0.5]; continued to work on motion to modify[2.0]; analyzed issues regarding motion to modify and discovery issues[1.0].	7.1	\$ 725.00	\$ 5,147.50
9/4/2021	JRM	Worked on motion to modify class definition[4.0].	4	\$ 725.00	\$ 2,900.00
9/5/2021	JRM	Worked on motion to modify the class definition[4.0].	4	\$ 725.00	\$ 2,900.00
9/6/2021	JRM	Worked on motion to modify the class definition[6.5].	6.5	\$ 725.00	\$ 4,712.50
9/7/2021	JRM	Telephone conference with Vestige regarding imaging client's devices[0.1]; followed up with same[0.2]; worked on motion to modify[2.4]; email correspondence regarding depositions[0.1]; followed up regarding Little Brook websites[0.1]; continued to work on motion to modify[1.7].	4.6	\$ 725.00	\$ 3,335.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/8/2021	JRM	Worked on motion to modify[5.0]; drafted reply in support of motion for leave to amend[2.0]; continued to revise motion to modify and worked on supporting documentation[1.8]; continued to work on motion to modify[1.5].	10.3	\$ 725.00	\$ 7,467.50
9/9/2021	JRM	Telephone conference with Mr. Ventura at Vestige[0.1]; email correspondence regarding same[0.1]; analyzed issues regarding subpoena topics[0.5]; email correspondence regarding subpoenas[0.2].	0.9	\$ 725.00	\$ 652.50
9/10/2021	JRM	Drafted email to opposing counsel regarding requested extension[0.5]; continued to revise email to counsel and analyze issues regarding same[0.5]; telephone conference with Ms. Rainwater regarding extension[0.1]; followed up regarding same[0.1]; telephone conference with Mr. Watkins regarding resuming deposition of Mr. Wood[0.1]; email to Mr. Watkins regarding data production[0.1]; analyzed issues regarding data production[0.3]; worked on supplemental interrogatory responses[0.5]; followed up with same[0.2]; revised same[0.2]; revised inspection protocol[0.5]; followed up with same[0.3]; continued to revise inspection protocol[1.0]; analyzed strategy with respect to depositions[0.5]; continued to work on discovery responses and inspection protocol[0.4].	5.3	\$ 725.00	\$ 3,842.50
9/13/2021	JRM	Followed up on discovery issues[0.2]; worked on subpoena to Nexxa[0.7].	0.9	\$ 725.00	\$ 652.50
9/14/2021	JRM	Email correspondence regarding subpoenas[0.1]; reviewed and revised draft stipulation[0.3]; continued to work on same[0.2]; reviewed documents and worked on outline for Nexxa deposition[2.0]; email correspondence with Nexxa regarding subpoena[0.1]	2.7	\$ 725.00	\$ 1,957.50
9/15/2021	JRM	Worked on topics for cross subpoena to LexisNexis[0.5]; worked on Exhibit A for cross-subpoena to Citadel[1.5]; worked on Exhibit A for subpoena to Prospects DM[0.5]; email correspondence regarding Nexxa deposition[0.1]; worked on Nexxa outline[0.5]; continued to work on same[0.5]; continued to work on preparing for vendor depositions[3.0].	6.6	\$ 725.00	\$ 4,785.00
9/16/2021	JRM	Worked on subpoenas[1.0]; prepared for Nexxa deposition[1.5]; continued to assemble exhibits and prepare for Nexxa deposition[4.7].	7.2	\$ 725.00	\$ 5,220.00
9/17/2021	JRM	Reviewed documents for deposition[0.2]; telephone conference with Mr. Paronich regarding Nexxa deposition[0.4]; telephone conference with Mr. Ventura regarding device preservation[0.1]; followed up with same[0.1]; analyzed issues relating to Nexxa testimony[0.2].	1	\$ 725.00	\$ 725.00
9/20/2021	JRM	Analyzed issues regarding upcoming depositions[0.5]; followed up with same[0.3]; worked on subpoenas[0.2]; reviewed revisions to inspection protocol[0.2]; email correspondence regarding same[0.1]; reviewed documents for LexisNexis deposition[0.3].	1.6	\$ 725.00	\$ 1,160.00
9/21/2021	JRM	Commenced preparing for LexisNexis deposition[0.5]; continued to work on same[0.5]; prepared for LexisNexis deposition[1.2]; analyzed issues relating to inspection protocol[0.3]; analyzed issues relating to campaign name glossary[0.5]; reviewed Yodel deposition outline[0.1]; analyzed issues regarding same[0.4]; reviewed draft Fluent subpoena and email correspondence regarding same[0.1].	3.6	\$ 725.00	\$ 2,610.00
9/22/2021	JRM	Worked on Yodel cross subpoena[1.0]; attended Yodel deposition[1.0]; followed up regarding same[0.5]; analyzed issues regarding inspection protocol[0.5]; telephone conference with Mr. Williams regarding same[0.5]; revised inspection protocol[1.0]; reviewed documents in preparation for depositions[1.0]; worked on Fluent subpoena[1.0]; drafted email to PillPack regarding protocol dispute and request to confer[0.4]; email correspondence regarding Fluent subpoena[0.2].	7.1	\$ 725.00	\$ 5,147.50
9/23/2021	JRM	Worked on task list for completion of discovery[0.5]; commenced drafting motion for protective order[0.5]; telephone conference with team regarding strategy issues[0.5]; worked on motion for protective order[3.5]; telephone conference with Mr. Payson and Mr. Franz regarding device inspection[0.5]; followed up regarding same[0.5]; worked on deposition preparation[1.3]; worked on LexisNexis outline[2.2].	9.5	\$ 725.00	\$ 6,887.50
9/24/2021	JRM	Continued to work on outline for LexisNexis deposition[1.0]; analyzed issues regarding same[0.2]; worked on outline of Tyler Hunt deposition[7.8]; analyzed issues regarding LexisNexis deposition[0.5]; email correspondence regarding Fluent deposition[0.1]; analyzed issues regarding same[0.1].	9.7	\$ 725.00	\$ 7,032.50
9/26/2021	JRM	Revised Tyler Hunt deposition outline[0.3].	0.3	\$ 725.00	\$ 217.50

Date	Timekeeper	Narrative	Units	Rate	Value
9/27/2021	JRM	Telephone call from Ms. Rainwater regarding depositions[0.1]; followed up with same[1.0]; analyzed issues regarding motion to exceed the deposition limit[0.7]; telephone call from co-counsel regarding depositions[0.2]; followed up with same[0.3].	2.3	\$ 725.00	\$ 1,667.50
9/29/2021	JRM	Worked on Citadel outline[7.5]; analyzed issues regarding Fluent[0.3].	7.8	\$ 725.00	\$ 5,655.00
9/30/2021	JRM	Analyzed issues regarding Citadel deposition[0.2]; telephone call from Mr. Paronich regarding Citadel deposition[0.2]; followed up with same[0.2]; worked on responses to requests for admission[1.5]; continued to work on same[0.5]; worked on interrogatory and RFP responses[3.2].	5.8	\$ 725.00	\$ 4,205.00
10/1/2021	JRM	Worked on discovery responses[1.7]; continued to work on discovery responses[0.7]; worked on outline for Prospects DM deposition[3.7].	6.1	\$ 725.00	\$ 4,422.50
10/4/2021	JRM	Reviewed documents produced by Byte Success[0.5]; analyzed issues regarding same[0.5]; worked on outline for Josh Grant deposition[0.2]; continued to work on same[2.8].	4	\$ 725.00	\$ 2,900.00
10/5/2021	JRM	Reviewed PillPack's opposition to motion to modify and analyzed issues regarding same[2.4]; worked on outline for Josh Grant deposition[1.3]; continued to work on same[1.0]; continued to work on same[2.5]; analyzed issues regarding same[0.3]; reviewed recent document productions[1.8].	9.3	\$ 725.00	\$ 6,742.50
10/6/2021	JRM	Worked on strategy for Josh Grant deposition[1.0]; attended Josh Grant deposition[7.3]; analyzed issues regarding same[0.5]; analyzed issues regarding reply in support of motion to supplement[0.5].	9.3	\$ 725.00	\$ 6,742.50
10/7/2021	JRM	Analyzed issues relating to motion to modify and email to team regarding same[0.3]; analyzed issues regarding motion to modify[1.2]; reviewed evidence for reply to motion to modify[3.8]; continued to work on same[3.7].	9	\$ 725.00	\$ 6,525.00
10/8/2021	JRM	Worked on reply in support of motion to modify and supporting papers[10.5].	10.5	\$ 725.00	\$ 7,612.50
10/11/2021	JRM	Reviewed motion to seal and analyzed issues regarding same[0.5]; continued to analyze issues regarding same[0.3]; followed up on discovery issues[0.5].	1.3	\$ 725.00	\$ 942.50
10/12/2021	JRM	Reviewed protocol and email correspondence regarding same[0.7]; followed up with Vestige regarding protocol[0.2]; telephone conference with co-counsel regarding same[0.3]; analyzed issues regarding same[0.2]; continued to analyze issues regarding protocol[0.5]; reviewed further revisions to protocol[0.2]; analyzed issues regarding same[0.2]; analyzed issues relating to expert discovery[0.5]; telephone conference with Mr. Hansen regarding same[0.5]; analyzed issues relating to discovery protocol and followed up with same[0.5].	3.8	\$ 725.00	\$ 2,755.00
10/13/2021	JRM	Email correspondence regarding expert deadlines and protocol[0.1]; analyzed issues regarding expert discovery[0.5]; continued to research same[1.9]; worked on stipulation to extend deadlines[0.5]; continued to analyze expert issues[0.5]; reviewed New York attorney general complaint against Fluent[0.5].	4	\$ 725.00	\$ 2,900.00
10/14/2021	JRM	Email correspondence regarding inspection protocol[0.1]; telephone conference with Mr. Williams regarding inspection protocol[0.5]; worked on motion to extend deadlines[0.5]; reviewed final of inspection protocol[0.1].	1.2	\$ 725.00	\$ 870.00
10/15/2021	JRM	Telephone conference with Ms. Verkhovskaya and Ms. Stasiewicz regarding expert report[0.5]; followed up with same[0.1].	0.6	\$ 725.00	\$ 435.00
10/19/2021	JRM	Analyzed issues regarding expert discovery[0.5].	0.5	\$ 725.00	\$ 362.50
10/22/2021	JRM	Telephone call from co-counsel regarding inspection of plaintiff's device[0.2]; followed up with same[0.3].	0.5	\$ 725.00	\$ 362.50
10/25/2021	JRM	Reviewed opposition brief and analyzed issues for reply[1.5].	1.5	\$ 725.00	\$ 1,087.50
10/26/2021	JRM	Analyzed issues for reply in support of motion to modify[0.6]; continued to work on same[0.9]; continued to work on PillPack reply and motion to approve notice[7.5].	9	\$ 725.00	\$ 6,525.00
10/28/2021	JRM	Worked on motion to approve notice plan[0.5]; analyzed issues regarding motion to modify[0.5].	1	\$ 725.00	\$ 725.00
10/29/2021	JRM	Reviewed and revised reply in support of mtn to modify[2.0].	2	\$ 725.00	\$ 1,450.00
11/3/2021	JRM	Reviewed decertification order and analyzed issues regarding same[0.7].	0.7	\$ 725.00	\$ 507.50
11/8/2021	JRM	Analyzed issues regarding proposed schedule and proposed changes to same[0.5]; continued to analyze issues regarding same[0.4].	0.9	\$ 725.00	\$ 652.50

Date	Timekeeper	Narrative	Units	Rate	Value
11/9/2021	JRM	Telephone conference with team regarding renewed motion for class certification[1.5]; followed up with same[0.3]; reviewed documents produced by Vestige[0.1]; analyzed issues regarding same[0.3].	2.2	\$ 725.00	\$ 1,595.00
11/10/2021	JRM	Worked on proposed schedule[0.8].	0.8	\$ 725.00	\$ 580.00
11/11/2021	JRM	Analyzed issues relating to proposed schedule[0.5]; telephone conference with Mr. Payson and Ms. Rainwater regarding schedule[0.4]; followed up with same[0.2].	1.1	\$ 725.00	\$ 797.50
11/12/2021	JRM	Reviewed Vestige privilege log[0.2]; followed up with same[0.2].	0.4	\$ 725.00	\$ 290.00
11/15/2021	JRM	Telephone conference with Mr. Payson and Ms. Rainwater regarding schedule[0.5]; analyzed issues regarding same[1.3].	1.8	\$ 725.00	\$ 1,305.00
11/16/2021	JRM	Telephone conference with team regarding case schedule and discovery[1.5].	1.5	\$ 725.00	\$ 1,087.50
11/17/2021	JRM	Reviewed and revised draft stipulation[0.1]; followed up with same[0.1]; telephone call from Mr. Kelley at Vestige[0.2]; followed up with same[0.7]; drafted letter to Franz regarding Vestige inspection[1.5]; followed up with same[0.2]; analyzed issues regarding data for supplemental expert reports[0.5].	3.3	\$ 725.00	\$ 2,392.50
11/18/2021	JRM	Reviewed changes to discovery letter and analyzed issues regarding same[0.3]; telephone conference with Mr. Kelley regarding device inspection[0.3]; followed up with same[0.4].	1	\$ 725.00	\$ 725.00
11/19/2021	JRM	Telephone conference with Ms. Rhodes regarding plaintiff device inspection[0.2]; followed up with same[0.2]; telephone conference with defense counsel regarding inspection of plaintiff's devices[0.5]; followed up regarding same[1.5].	2.4	\$ 725.00	\$ 1,740.00
11/23/2021	JRM	Telephone conference with Mr. Kelley and Ms. Rhodes regarding PillPack questions[0.5]; followed up with same[0.3].	0.8	\$ 725.00	\$ 580.00
11/30/2021	JRM	Telephone conference with Vestige regarding follow up[0.3]; followed up on conversation with Vestige[0.5]; follow up call with Vestige[0.2]; continued to analyze issues relating to supplemental report[0.5]; analyzed issues regarding Vestige imaging[0.5].	2	\$ 725.00	\$ 1,450.00
12/1/2021	JRM	Reviewed stipulation and email correspondence regarding same[0.1]; telephone conference with Ms. Rhodes regarding supplemental report[0.1]; followed up regarding same[0.2]; analyzed class data[1.0]; continued to analyze issues regarding same[1.0].	2.4	\$ 725.00	\$ 1,740.00
12/2/2021	JRM	Analyzed data issue for renewed class certification motion[0.5].	0.5	\$ 725.00	\$ 362.50
12/6/2021	JRM	Analyzed issues regarding class size and cell phone scrub[0.3]; telephone conference with Mr. Hansen regarding same[0.3]; followed up regarding same[0.1]; telephone conference with team regarding expert work[1.5]; followed up with same[0.7]; continued to review documents and analyze issues for expert report[0.8].	3.7	\$ 725.00	\$ 2,682.50
12/7/2021	JRM	Reviewed client's comments regarding site inspection report and followed up with same[0.4].	0.4	\$ 725.00	\$ 290.00
12/8/2021	JRM	Telephone conference with Vestige regarding supplemental report[0.2]; followed up with same[0.2]; continued to review and analyze issues relating to supplemental report[0.8].	1.2	\$ 725.00	\$ 870.00
12/9/2021	JRM	Reviewed client comments to Vestige report and analyzed issues regarding same[0.5]; reviewed further correspondence from client regarding Vestige report and analyzed issues regarding same[0.5]; telephone conference with client[0.2]; followed up with same[0.3].	1.5	\$ 725.00	\$ 1,087.50
12/10/2021	JRM	Telephone conference with Ms. Rhodes of Vestige regarding supplemental report[0.2].	0.2	\$ 725.00	\$ 145.00
12/13/2021	JRM	Telephone conference with Mr. Hansen regarding expert work[0.2]; followed up with same[0.1].	0.3	\$ 725.00	\$ 217.50
12/17/2021	JRM	Analyzed issues regarding Vestige collection and email correspondence with team regarding same[1.0]; telephone conference with team regarding same[1.0]; followed up with Vestige regarding same[0.3]; continued to follow up on Vestige issues[0.5].	2.8	\$ 725.00	\$ 2,030.00
12/20/2021	JRM	Prepared for client meeting[0.3]; telephone conference with Mr. Williams regarding PillPack's further questions[1.0]; followed up regarding same[0.5]; analyzed issues regarding same[0.5].	2.3	\$ 725.00	\$ 1,667.50
12/21/2021	JRM	Reviewed [REDACTED] [0.5]; telephone conference with consulting expert regarding case status[1.0]; telephone conference with Mr. Paronich regarding [REDACTED] [0.5]; analyzed issues regarding same[0.5]; drafted email to client memorializing [REDACTED] [1.0];	4	\$ 725.00	\$ 2,900.00
12/22/2021	JRM	drafted email to Mr. Franz regarding questions to plaintiff[0.5].	0.3	\$ 725.00	\$ 217.50
		Analyzed issues regarding device inspection[0.3].			

Date	Timekeeper	Narrative	Units	Rate	Value
12/27/2021	JRM	Analyzed issues regarding next steps[0.2]; telephone conference with team regarding same[0.7]; analyzed issues and drafted emails to opposing counsel and client[2.5]; revised email to opposing counsel[0.7].	4.1	\$ 725.00	\$ 2,972.50
12/28/2021	JRM	Analyzed issues regarding Vestige inspection and email correspondence regarding same[0.3]; continued to work on same[0.5]; telephone conference with consulting expert regarding discovery issues[1.0]; telephone conference with Mr. Williams regarding same[1.0].	2.8	\$ 725.00	\$ 2,030.00
12/29/2021	JRM	Analyzed issues relating to device inspection and protective order motion[1.5].	1.5	\$ 725.00	\$ 1,087.50
1/3/2022	JRM	Analyzed issues regarding next steps[0.5]; worked on motion for protective order[1.4].	1.9	\$ 725.00	\$ 1,377.50
1/4/2022	JRM	Worked on motion for protective order[2.0].	2	\$ 725.00	\$ 1,450.00
1/5/2022	JRM	Email correspondence regarding Vestige inspection[0.2].	0.2	\$ 725.00	\$ 145.00
1/6/2022	JRM	Analyzed expert issues[0.5]; telephone conference with Mr. Hansen[0.2]; worked on expert report issues[3.0].	3.7	\$ 725.00	\$ 2,682.50
1/7/2022	JRM	Worked on motion for protective order[6.5].	6.5	\$ 725.00	\$ 4,712.50
1/10/2022	JRM	Revised motion for protective order[0.7]; worked on motion for protective order[1.2].	1.9	\$ 725.00	\$ 1,377.50
1/12/2022	JRM	Worked on expert report[0.5].	0.5	\$ 725.00	\$ 362.50
1/13/2022	JRM	Reviewed expert report and proposed edits[2.2].	2.2	\$ 725.00	\$ 1,595.00
1/14/2022	JRM	Videoconference with Mr. Hansen regarding expert report and follow up[1.5]; worked on expert report[2.5]; continued to work on same[0.7].	4.7	\$ 725.00	\$ 3,407.50
1/18/2022	JRM	Reviewed revised report[0.2].	0.2	\$ 725.00	\$ 145.00
1/24/2022	JRM	Worked on proposed class definition[0.5].	0.5	\$ 725.00	\$ 362.50
1/28/2022	JRM	Worked on objections to Hansen subpoena[1.5]; continued to work on same[0.7].	2.2	\$ 725.00	\$ 1,595.00
2/1/2022	JRM	Worked on objections to subpoena[0.7]; continued to work on same[0.5].	1.2	\$ 725.00	\$ 870.00
2/2/2022	JRM	Analyzed issues regarding preservation of imaged data[0.2].	0.2	\$ 725.00	\$ 145.00
2/4/2022	JRM	Analyzed issues regarding consent[0.5]; continued to analyze same[0.5]; reviewed opt in data and investigated purported opt ins[1.0].	2	\$ 725.00	\$ 1,450.00
2/14/2022	JRM	Email correspondence regarding expert deposition[0.1].	0.1	\$ 725.00	\$ 72.50
2/28/2022	JRM	Reviewed supplemental expert report of Jennifer Smith[0.9]; analyzed issues regarding same[0.2].	1.1	\$ 725.00	\$ 797.50
3/1/2022	JRM	Telephone call from Mr. Hansen regarding rebuttal report[0.2].	0.2	\$ 725.00	\$ 145.00
3/9/2022	JRM	Worked on subpoena objections[1.0]; worked on subpoena response[0.5]; continued to work on same[0.5]; continued to work on same[3.0].	5	\$ 725.00	\$ 3,625.00
3/10/2022	JRM	Worked with expert on subpoena response[1.5]; continued to work on same[0.2]; continued to work on same[0.5].	2.2	\$ 725.00	\$ 1,595.00
3/11/2022	JRM	Revised objections[0.5]; reviewed documents to produce and continued to revise objections and telephone conference with Mr. Hansen regarding same[1.3]	1.8	\$ 725.00	\$ 1,305.00
3/24/2022	JRM	Reviewed new class certification order[0.2]; analyzed issues regarding renewed motion for class certification[0.3]; reviewed documents for second class cert motion[4.1]; continued to work on same[0.5].	5.1	\$ 725.00	\$ 3,697.50
3/25/2022	JRM	Reviewed documents for second class certification motion[1.3].	1.3	\$ 725.00	\$ 942.50
4/1/2022	JRM	Analyzed issues regarding class certification brief[0.4].	0.4	\$ 725.00	\$ 290.00
4/6/2022	JRM	Reviewed new Ninth Circuit decision for renewed class certification motion[0.3].	0.3	\$ 725.00	\$ 217.50
4/11/2022	JRM	Analyzed issues regarding class certification motion[0.2]; continued to work on same[0.5]; continued to work on same[1.5]; continued to work on same[0.8]; continued to work on same[0.3]; continued to work on same[3.0]; continued to work on same[0.8].	7.1	\$ 725.00	\$ 5,147.50
4/12/2022	JRM	Worked on class certification motion[0.3]; continued to work on same[0.4]; worked on class certification motion[6.7].	7.4	\$ 725.00	\$ 5,365.00
4/13/2022	JRM	Worked on class certification motion[3.5]; continued to work on same[5.0].	8.5	\$ 725.00	\$ 6,162.50
4/14/2022	JRM	Worked on class certification motion[1.5]; continued to work on same[3.2]; continued to work on same[2.0].	6.7	\$ 725.00	\$ 4,857.50
4/15/2022	JRM	Worked on class certification motion[1.5]; continued to work on same[0.5]; continued to work on same[1.7]; continued to work on same[4.0].	7.7	\$ 725.00	\$ 5,582.50

Date	Timekeeper	Narrative	Units	Rate	Value
4/16/2022	JRM	Worked on class certification motion[6.1].	6.1	\$ 725.00	\$ 4,422.50
4/18/2022	JRM	Worked on motion for class certification[0.4]; analyzed issues regarding same[0.2]; continued to work on same[1.0]; continued to work on same[0.5]; continued to work on same[2.5].	4.6	\$ 725.00	\$ 3,335.00
4/19/2022	JRM	Worked on class certification motion[1.5]; continued to work on same[5.0].	6.5	\$ 725.00	\$ 4,712.50
4/20/2022	JRM	Worked on class certification motion[0.5]; continued to work on same[0.4]; continued to work on same[1.8]; continued to work on same[1.2]; worked on sealing issues[1.0]; continued to work on class certification motion[1.5].	6.4	\$ 725.00	\$ 4,640.00
4/21/2022	JRM	Worked on class certification motion[1.0]; continued to work at same[1.2]; continued to work on same[6.3].	8.5	\$ 725.00	\$ 6,162.50
4/22/2022	JRM	Worked on motion for class certification and supporting documents[12.3].	12.3	\$ 725.00	\$ 8,917.50
5/10/2022	JRM	Worked on opposition to motion to seal[1.0]; drafted reply in support of motion to seal[2.2]; reviewed new class certification decisions[0.5].	3.7	\$ 725.00	\$ 2,682.50
5/11/2022	JRM	Reviewed and revised reply brief[0.3].	0.3	\$ 725.00	\$ 217.50
5/12/2022	JRM	Reviewed and revised reply iso mtn to seal[0.2].	0.2	\$ 725.00	\$ 145.00
5/19/2022	JRM	Email correspondence regarding sealing issue[0.1].	0.1	\$ 725.00	\$ 72.50
5/20/2022	JRM	Reviewed opposition to motion for class certification[0.3].	0.3	\$ 725.00	\$ 217.50
5/25/2022	JRM	Worked on outlining reply iso class certification[1.5]; continued to work on same[1.0]; continued to work on same[2.7].	5.2	\$ 725.00	\$ 3,770.00
5/26/2022	JRM	Worked on class certification reply[2.0]; continued to work on same[1.5]; continued to work on same[4.7].	8.2	\$ 725.00	\$ 5,945.00
5/27/2022	JRM	Worked on class cert reply[2.5]; continued to work on same[5.5].	8	\$ 725.00	\$ 5,800.00
5/30/2022	JRM	Worked on class cert reply[9.7].	9.7	\$ 725.00	\$ 7,032.50
5/31/2022	JRM	Worked on class certification reply[9.0].	9	\$ 725.00	\$ 6,525.00
6/1/2022	JRM	Worked on reply brief[9.8].	9.8	\$ 725.00	\$ 7,105.00
6/2/2022	JRM	Worked on class certification reply[8.9].	8.9	\$ 725.00	\$ 6,452.50
6/3/2022	JRM	Worked on class certification reply[3.5]; continued to work on same[2.2]; continued to work on same[3.0].	8.7	\$ 725.00	\$ 6,307.50
7/5/2022	JRM	Analyzed issues regarding same[0.4].	0.4	\$ 725.00	\$ 290.00
7/7/2022	JRM	Analyzed issues relating to summary judgment opposition[0.5].	0.5	\$ 725.00	\$ 362.50
7/8/2022	JRM	Worked on summary judgment opposition[4.0].	4	\$ 725.00	\$ 2,900.00
7/11/2022	JRM	Reviewed opposition to summary judgment[0.5].	0.5	\$ 725.00	\$ 362.50
12/5/2022	JRM	Reviewed order on summary judgment and analyzed issues regarding same[0.5].	0.5	\$ 725.00	\$ 362.50
12/29/2022	JRM	Drafted motion to approve notice plan[2.0]; worked on proposed notice forms[0.4].	2.4	\$ 725.00	\$ 1,740.00
12/30/2022	JRM	Worked on notice plan and proposed schedule[1.6].	1.6	\$ 725.00	\$ 1,160.00
1/3/2023	JRM	Worked on notice plan and proposed schedule[1.3].	1.3	\$ 725.00	\$ 942.50
1/4/2023	JRM	Analyzed issues relating to data analysis[0.2].	0.2	\$ 725.00	\$ 145.00
1/20/2023	JRM	Analyzed issues regarding notice plan[0.3]; telephone conference with Mr. Williams about case status[0.7].	1	\$ 725.00	\$ 725.00
1/23/2023	JRM	Telephone conference with Epiq regarding notice plan[0.5]; followed up with same[0.5]; reviewed and revised email to opposing counsel regarding notice plan[0.3]; reviewed and revised class notices[0.4].	1.7	\$ 725.00	\$ 1,232.50
1/24/2023	JRM	Analyzed issues relating to notice plan and reviewed draft documents from notice administrator[0.5]; continued to analyze issues regarding notice[0.5].	1	\$ 725.00	\$ 725.00
1/30/2023	JRM	Analyzed issues regarding notice plan[0.2].	0.2	\$ 725.00	\$ 145.00
1/31/2023	JRM	Analyzed issues regarding case schedule[0.3].	0.3	\$ 725.00	\$ 217.50
2/1/2023	JRM	Worked on class notice issues[0.5].	0.5	\$ 725.00	\$ 362.50
2/2/2023	JRM	Worked on notice plan[0.3]; telephone conference with Ms. Fierieck regarding same[0.1]; followed up with same[0.1]; worked on notice motion[0.5]; worked on motion to approve notice plan[1.4]; continued to work on same[0.5]; continued to work on same[0.7].	3.6	\$ 725.00	\$ 2,610.00
2/3/2023	JRM	Analyzed issues relating to re-note for motion[0.1].	0.1	\$ 725.00	\$ 72.50

Date	Timekeeper	Narrative	Units	Rate	Value
2/13/2023	JRM	Analyzed issues relating to opposition to notice plan[0.7].	0.7	\$ 725.00	\$ 507.50
2/14/2023	JRM	Telephone conference with Epiq regarding notice[0.2]; analyzed issues regarding same[0.2].	0.4	\$ 725.00	\$ 290.00
2/15/2023	JRM	Reviewed and revised reply in support of notice plan[0.7].	0.7	\$ 725.00	\$ 507.50
2/16/2023	JRM	Reviewed and revised reply in support of notice plan[0.2]; telephone conference with Epiq regarding supplemental declaration[0.1].	0.3	\$ 725.00	\$ 217.50
2/17/2023	JRM	Worked on reply brief[0.5]; reviewed declaration from Epiq and revised same[0.1]; telephone conference with Epiq regarding same[0.1]; followed up regarding same[0.1]; revised brief and email correspondence regarding same[0.1].	0.9	\$ 725.00	\$ 652.50
2/21/2023	JRM	Prepared for status conference[2.7].	2.7	\$ 725.00	\$ 1,957.50
2/22/2023	JRM	Prepared for scheduling conference[0.5]; attended scheduling conference[0.3].	0.8	\$ 725.00	\$ 580.00
3/20/2023	JRM	Reviewed order and analyzed issues regarding same[0.4].	0.4	\$ 725.00	\$ 290.00
3/22/2023	JRM	Telephone conference with co-counsel regarding notice plan[0.2].	0.2	\$ 725.00	\$ 145.00
3/23/2023	JRM	Telephone conference with Epiq regarding notice plan[0.5].	0.5	\$ 725.00	\$ 362.50
3/28/2023	JRM	Email correspondence with notice administrator[0.1].	0.1	\$ 725.00	\$ 72.50
4/5/2023	JRM	Analyzed issues regarding notice[0.5]; telephone conference with Epiq regarding same[0.2]; followed up regarding same[0.4].	1.1	\$ 725.00	\$ 797.50
4/6/2023	JRM	Analyzed issues relating to notice plan[0.2]; analyzed issues regarding notice and outstanding discovery[0.5]; analyzed issues relating to subpoena project[0.5].	1.2	\$ 725.00	\$ 870.00
4/7/2023	JRM	Analyzed issues relating to subpoenas[0.5]; worked on reverse lookup issues[0.5]; telephone conference with Epiq regarding same[0.1]; continued to analyze issues regarding same[0.5].	1.6	\$ 725.00	\$ 1,160.00
4/10/2023	JRM	Analyzed issues regarding subpoena project[0.2].	0.2	\$ 725.00	\$ 145.00
4/11/2023	JRM	Analyzed issues regarding notice[0.5].	0.5	\$ 725.00	\$ 362.50
4/14/2023	JRM	Reviewed reply in support of motion to extend deadline[0.1]; analyzed issues regarding same[0.2]; analyzed issues regarding subpoena project[0.7].	1	\$ 725.00	\$ 725.00
4/18/2023	JRM	Reviewed cover letter and notices for subpoenas to carriers and proposed edits regarding same[0.1].	0.1	\$ 725.00	\$ 72.50
4/19/2023	JRM	Analyzed issues regarding next steps for notice[0.2].	0.2	\$ 725.00	\$ 145.00
4/20/2023	JRM	Analyzed issues regarding discovery[0.2].	0.2	\$ 725.00	\$ 145.00
4/28/2023	JRM	Analyzed issues relating to confidentiality[0.2]; telephone conference with Ms. Rainwater and Mr. Franz regarding same[0.3]; followed up with same[0.3].	0.8	\$ 725.00	\$ 580.00
5/1/2023	JRM	Analyzed issues regarding subpoenas[0.5].	0.5	\$ 725.00	\$ 362.50
5/2/2023	JRM	Reviewed documents produced by Performance Media[0.5].	0.5	\$ 725.00	\$ 362.50
5/17/2023	JRM	Worked on motions to enforce and transfer Verizon subpoenas[0.8]; worked on motion to enforce T-Mobile subpoena[0.6].	1.4	\$ 725.00	\$ 1,015.00
5/18/2023	JRM	Worked on motions to enforce subpoenas[0.7]; continued to work on same[0.2]; worked on subpoena enforcement action T-Mobile[0.2]; continued to work on same[0.5].	1.6	\$ 725.00	\$ 1,160.00
7/10/2023	JRM	Reviewed order and email correspondence regarding same[0.1].	0.1	\$ 725.00	\$ 72.50
7/13/2023	JRM	Telephone conference with Epiq regarding notice[0.2]; followed up with same[0.1].	0.3	\$ 725.00	\$ 217.50
7/21/2023	JRM	Analyzed issues regarding PillPack's failure to produce contact information[0.2]; analyzed issues on privacy statutes[2.2].	2.4	\$ 725.00	\$ 1,740.00
7/27/2023	JRM	Telephone conference with opposing counsel about contact information[0.2]; followed up with same[0.2].	0.4	\$ 725.00	\$ 290.00
7/28/2023	JRM	Analyzed issues regarding notice[0.5]; continued to work on same[0.3].	0.8	\$ 725.00	\$ 580.00
8/2/2023	JRM	Videoconference with Epiq regarding notice plan[0.6]; followed up with same[0.2].	0.8	\$ 725.00	\$ 580.00
8/11/2023	JRM	Telephone conference with consulting expert regarding subpoena process[0.5].	0.5	\$ 725.00	\$ 362.50
8/21/2023	JRM	Analyzed issues regarding motion to compel[0.3].	0.3	\$ 725.00	\$ 217.50
8/23/2023	JRM	Reviewed motion to compel and provided comments and suggestions to same[0.5].	0.5	\$ 725.00	\$ 362.50
8/28/2023	JRM	Worked on discovery issues[0.3].	0.3	\$ 725.00	\$ 217.50
9/6/2023	JRM	Analyzed issues regarding reply brief iso mtn for sanctions[0.2].	0.2	\$ 725.00	\$ 145.00
9/8/2023	JRM	Reviewed reply in support of motion to compel[0.1]; telephone call from Epiq about class notice[0.2]; followed up with same[0.3].	0.6	\$ 725.00	\$ 435.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/12/2023	JRM	Analyzed issues regarding PillPack data[0.3]. Reviewed website[0.3]; analyzed issues regarding same[0.2]; analyzed issues regarding prior express written consent[0.5].	0.3	\$ 725.00	\$ 217.50
9/14/2023	JRM	Analyzed issues regarding motion to compel ruling and follow-up[0.5].	1	\$ 725.00	\$ 725.00
10/5/2023	JRM	Analyzed discovery issues[0.3].	0.5	\$ 725.00	\$ 362.50
10/9/2023	JRM	Analyzed issues for meet and confer[0.2].	0.3	\$ 725.00	\$ 217.50
10/10/2023	JRM	Telephone conference with notice provider regarding declaration listing opt outs[0.1].	0.2	\$ 725.00	\$ 145.00
11/13/2023	JRM	Reviewed and revised reply brief[0.5].	0.1	\$ 725.00	\$ 72.50
12/27/2023	JRM	Telephone conference with team regarding trial strategy[0.9].	0.5	\$ 725.00	\$ 362.50
1/11/2024	JRM	Strategized about next steps for trial[0.5].	0.9	\$ 725.00	\$ 652.50
1/12/2024	JRM	Analyzed issues relating to lead generator data[0.1].	0.5	\$ 725.00	\$ 362.50
1/22/2024	JRM	Analyzed issues regarding data analysis[1.0]; continued to work on same[0.5]; continued to work on discovery issues[2.5].	0.1	\$ 725.00	\$ 72.50
1/30/2024	JRM	Analyzed issues relating to subpoenaed data[0.4].	4	\$ 725.00	\$ 2,900.00
1/31/2024	JRM	Reviewed recent subpoena productions[1.5]; continued to work on same[0.5]; continued to review subpoena responses and correspondence[1.0].	0.4	\$ 725.00	\$ 290.00
2/1/2024	JRM	Reviewed documents recently produced in response to subpoenas[0.4].	3	\$ 725.00	\$ 2,175.00
2/2/2024	JRM	Worked on pretrial strategy[1.4]; continued to work on same[0.3]; worked on pretrial strategy and task list[2.0].	0.4	\$ 725.00	\$ 290.00
2/5/2024	JRM	Reviewed call transfer records and email correspondence regarding same[0.2]; continued to analyze issues regarding pre-trial strategy[1.0]; continued to work on same[0.5].	3.7	\$ 725.00	\$ 2,682.50
2/6/2024	JRM	Analyzed issues regarding supplemental notice and drafted email to opposing counsel regarding same[1.0].	1.7	\$ 725.00	\$ 1,232.50
2/7/2024	JRM	Analyzed issues regarding supplemental notice[0.5].	1	\$ 725.00	\$ 725.00
2/8/2024	JRM	Telephone conference with team regarding trial task list[0.5]; followed up and analyzed issues regarding same[1.5].	0.5	\$ 725.00	\$ 362.50
2/9/2024	JRM	Strategized regarding trial preparation tasks[0.3]; telephone conference with client regarding next steps[0.5]; reviewed Mr. Payson's email regarding extension of case schedule and analyzed issues regarding same[0.2]; legal research regarding claims process[0.3].	2	\$ 725.00	\$ 1,450.00
2/12/2024	JRM	Telephone call from Mr. Payson regarding class notice motion[0.3]; analyzed issues regarding same[0.2]; voicemail from Mr. Payson regarding supplemental notice and followed up with same[0.3].	1.3	\$ 725.00	\$ 942.50
2/13/2024	JRM	Analyzed issues regarding supplemental notice[0.2]; reviewed stipulated motion and analyzed issues regarding same[0.2].	0.8	\$ 725.00	\$ 580.00
2/14/2024	JRM	Strategized on evidentiary issues for trial[1.0].	0.4	\$ 725.00	\$ 290.00
2/15/2024	JRM	Telephone conference with Mr. Paronich regarding trial strategy[0.2].	1	\$ 725.00	\$ 725.00
2/19/2024	JRM	Analyzed issues relating to expert work[0.3].	0.2	\$ 725.00	\$ 145.00
2/22/2024	JRM	Telephone conference with expert[0.5]; reviewed draft expert report[0.3]; analyzed issues regarding same[0.3].	0.3	\$ 725.00	\$ 217.50
2/23/2024	JRM	Analyzed expert report issues[2.8]; reviewed and revised expert report[0.3].	1.1	\$ 725.00	\$ 797.50
2/24/2024	JRM	Worked on expert report[1.5].	3.1	\$ 725.00	\$ 2,247.50
2/26/2024	JRM	Analyzed issues regarding Dorf deposition[0.5].	1.5	\$ 725.00	\$ 1,087.50
2/27/2024	JRM	Strategized about expert report[0.5]; analyzed issues regarding potential rebuttal expert[0.5]; prepared for meet and confer[0.2]; telephone conference with opposing counsel regarding potential mediation[0.3]; analyzed strategy issues for mediating and completing discovery[1.5].	0.5	\$ 725.00	\$ 362.50
2/28/2024	JRM	Analyzed issues regarding potential mediators and strategized about discovery stay[0.4].	3	\$ 725.00	\$ 2,175.00
2/29/2024	JRM	Reviewed draft stipulation to stay deadlines[0.2]; email correspondence regarding same[0.2].	0.4	\$ 725.00	\$ 290.00
3/4/2024	JRM	Telephone conference with Ms. Rainwater regarding mediation scheduling[0.1]; followed up with same[0.2]; revised motion to stay[0.2].	0.4	\$ 725.00	\$ 290.00
3/6/2024	JRM	Analyzed issues regarding extension[0.3].	0.5	\$ 725.00	\$ 362.50
3/13/2024	JRM		0.3	\$ 725.00	\$ 217.50

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Date	Timekeeper	Narrative	Units	Rate	Value
3/19/2024	JRM	Analyzed mediation issues[0.2].	0.2	\$ 725.00	\$ 145.00
5/23/2024	JRM	Telephone conference with Mr. Meyer and defense counsel and followed up with same[0.7].	0.7	\$ 725.00	\$ 507.50
5/24/2024	JRM	Reviewed mediation letter and strategized regarding same[0.3].	0.3	\$ 725.00	\$ 217.50
5/26/2024	JRM	Reviewed and commented on mediation letter and email correspondence regarding same[0.1].	0.1	\$ 725.00	\$ 72.50
5/29/2024	JRM	Reviewed and revised draft settlement agreement[0.4]; analyzed issues regarding same[0.5]; reviewed PillPack's mediation submission and analyzed issues regarding same[1.5]; continued to strategize about same[1.0].	3.4	\$ 725.00	\$ 2,465.00
5/30/2024	JRM	Telephone conference with Mr. Williams regarding mediation[0.1].	0.1	\$ 725.00	\$ 72.50
5/31/2024	JRM	Compiled list of comparable cases for mediation[2.9]; continued to work on same[1.3].	4.2	\$ 725.00	\$ 3,045.00
6/4/2024	JRM	Traveled to Los Angeles for mediation[5.5].	5.5	\$ 725.00	\$ 3,987.50
		Prepared for mediation[0.5]; attended mediation[6.0]; traveled from mediation[6.0].			
6/5/2024	JRM		12.5	\$ 725.00	\$ 9,062.50
6/26/2024	JRM	Reviewed and revised preliminary approval motion[0.2].	0.2	\$ 725.00	\$ 145.00
7/12/2024	JRM	Reviewed settlement agreement edits[0.1]; telephone conference with Ms. Rainwater and Mr. Payson regarding edits[0.3].	0.4	\$ 725.00	\$ 290.00
7/17/2024	JRM	Reviewed settlement notices and revised same[0.3]; drafted preliminary and final approval orders[1.0]; drafted settlement timeline[1.2].	2.5	\$ 725.00	\$ 1,812.50
7/18/2024	JRM	Analyzed issues relating to settlement class list[0.1].	0.1	\$ 725.00	\$ 72.50
8/5/2024	JRM	Worked on claim form[0.2].	0.2	\$ 725.00	\$ 145.00
8/6/2024	JRM	Reviewed bid proposals to prepare for call with Epiq[0.3]; attended call with Epiq[0.1]; followed up with same[0.1].	0.5	\$ 725.00	\$ 362.50
8/12/2024	JRM	Analyzed notice issues and multiple emails regarding same[0.5]; commenced review of PillPack's edits to notices[0.4]; continued to work on same[1.5].	2.4	\$ 725.00	\$ 1,740.00
8/13/2024	JRM	Analyzed issues relating to notice[0.2].	0.2	\$ 725.00	\$ 145.00
9/17/2024	JRM	Reviewed settlement schedule dates and preliminary approval order[0.4].	0.4	\$ 725.00	\$ 290.00
10/15/2024	JRM	Analyzed issues regarding class list[0.2].	0.2	\$ 725.00	\$ 145.00
10/17/2024	JRM	Analyzed issues regarding class notice[0.2]; telephone conference with administrator regarding notice[0.2]; followed up with same[0.2].	0.6	\$ 725.00	\$ 435.00
		Statement Professional: Jennifer Rust Murray	1298.4		\$ 941,340.00
6/27/2022	JS	Worked on research project [0.6].	0.6	\$ 250.00	\$ 150.00
6/28/2022	JS	Worked on research [1.0].	1	\$ 250.00	\$ 250.00
6/29/2022	JS	Worked on research [4.8]; evaluated and analyzed case strategy [0.4].	5.2	\$ 250.00	\$ 1,300.00
6/30/2022	JS	Worked on research [7.7].	7.7	\$ 250.00	\$ 1,925.00
7/1/2022	JS	Worked on research [8.0].	8	\$ 250.00	\$ 2,000.00
7/5/2022	JS	Worked on research report [7.5].	7.5	\$ 250.00	\$ 1,875.00
7/6/2022	JS	Completed informal research memo [1.6]; evaluated case strategy [1.0]; worked on research analysis [4.4].	7	\$ 250.00	\$ 1,750.00
7/7/2022	JS	Completed research memo draft [2.0]; revised research memo draft [5.8].	7.8	\$ 250.00	\$ 1,950.00
7/8/2022	JS	Completed research revisions [1.5]; analyzed case strategy [.5].	2	\$ 250.00	\$ 500.00
7/12/2022	JS	Analyzed case strategy [0.2].	0.2	\$ 250.00	\$ 50.00
		Statement Professional: James Stafford	47		\$ 11,750.00
5/11/2023	KB	Researched locations and distances for process service of subpoenas from multiple sheriff offices to registered agents of wireless companies in order to identify how soon service may take place of subpoenas and identify appropriate response date of same[.7].	0.7	\$ 225.00	\$ 157.50

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5/12/2023	KB	Reviewed and revised wireless carriers subpoena packets for process service by sheriff's office[1.8]. Coordinated mailing and delivery of subpoena packets through office personal[.3]. Provided payment to process service vendor for process service of subpoena packet to registered agent for Nsightel Wireless, LLC[.6]. Served counsel of record with revised wireless carrier subpoena packets[.4]	3.1	\$ 225.00	\$ 697.50
5/16/2023	KB	Researched and confirmed wireless entity served in Scobey, MT via U.S mail [.4]. Commenced updating of second revised subpoena packets to five wireless carriers via the sheriff's office[1.5].	1.9	\$ 225.00	\$ 427.50
5/17/2023	KB	Finished updating five revised subpoena packets to be U.S mailed to sheriff's departments[.5]. Drafted, finalized, and coordinated letters to five counties' sheriff's departments and coordinated U.S mail service of the same[2.5].	3	\$ 225.00	\$ 675.00
5/18/2023	KB	Served counsel with second revised wireless subpoena packets[.1].	0.1	\$ 225.00	\$ 22.50
5/23/2023	KB	Received, reviewed, and provided for filing the signed affidavit of service to wireless carrier Nsightel[.2].	0.2	\$ 225.00	\$ 45.00
6/26/2023	KB	Drafted stipulated motion to extend deadline to send class notice[.3].	0.3	\$ 225.00	\$ 67.50
6/28/2023	KB	Drafted declaration in support of stipulated motion to extend deadline to send class notice[.3]. Finalized stipulated motion to extend deadline to send class notice, corresponding declaration, and filed the same with the court[.5].	0.8	\$ 225.00	\$ 180.00
6/29/2023	KB	Drafted and finalized supplemental declaration of Blythe Chandler with corresponding exhibits[.3].	0.3	\$ 225.00	\$ 67.50
8/22/2023	KB	Drafted motion to compel shell with declaration and proposed order[.5].	0.5	\$ 225.00	\$ 112.50
8/23/2023	KB	Formatted, revised, and ran tables on motion to compel production of class members, finalized declaration and proposed order, and filed all with the court[1.9].	1.9	\$ 225.00	\$ 427.50
8/29/2023	KB	Drafted reply shell in support of motion to compel[.4].	0.4	\$ 225.00	\$ 90.00
9/12/2023	KB	Drafted response shell, supporting declaration, and proposed order to defendant's cross-motion for protective order[.5].	0.5	\$ 225.00	\$ 112.50
9/13/2023	KB	Finalized response, including tables of contents and authorities, to cross-motion for protective order[.8].	1.1	\$ 225.00	\$ 247.50
9/18/2023	KB	Finalized declaration in support of response to cross-motion for protective order and proposed order[.1]. Filed response to cross-motion for protective order with the court[.2]	0.2	\$ 225.00	\$ 45.00
10/19/2023	KB	Updated caption form to reflect pro hac vice admission of defense counsel[.2].	1.1	\$ 225.00	\$ 247.50
11/14/2023	KB	Drafted motion for reconsideration shell and proposed order[.2]. Drafted declaration shell in support of motion for reconsideration[.1]. Finalized motion, declaration, and exhibits and filed the same with the court[.8].	0.2	\$ 225.00	\$ 45.00
11/17/2023	KB	Drafted declaration of Lucas Meyer regarding requests for exclusion[.2]. Drafted 30(b)(6) notice of second deposition to PillPack[.3]. Drafted notice of 30(b)(1) deposition to Alex Uribe[.2]. Drafted subpoena for deposition to Performance Media[.2]. Drafted subpoena for deposition to Mark Dorf[.1].	0.8	\$ 225.00	\$ 180.00
12/7/2023	KB	Drafted first requests for admission to defendant shell[.2].	0.2	\$ 225.00	\$ 45.00
12/8/2023	KB	Finalized and served first requests for admission to defendant and notice of deposition of Alex Uribe[.4].	0.4	\$ 225.00	\$ 90.00
12/20/2023	KB	Drafted reply in support of motion for reconsideration shell[.1].	0.1	\$ 225.00	\$ 22.50
12/27/2023	KB	Finalized and filed reply in support of motion for reconsideration[.2].	0.2	\$ 225.00	\$ 45.00
1/16/2024	KB	Drafted letter shell to defendants counsel regarding a meet and confer[.2].	0.2	\$ 225.00	\$ 45.00
1/17/2024	KB	Finalized and served letter to defense counsel regarding a meet and confer[.2].	0.2	\$ 225.00	\$ 45.00
2/6/2024	KB	Finalized and served amended notice of deposition of Uribe[.2]. Coordinated court reporter and video services for deposition of Uribe[.1].	0.3	\$ 225.00	\$ 67.50
2/12/2024	KB	Cancelled court reporter for Uribe[.1].	0.1	\$ 225.00	\$ 22.50
2/14/2024	KB	Began drafting LCR 37 submission[.2].	0.2	\$ 225.00	\$ 45.00
2/20/2024	KB	Finalized stipulated motion to extend time to send class notice[.1]. Filed stipulated motion with the court[.2]	0.3	\$ 225.00	\$ 67.50
2/22/2024	KB	Drafted, finalized, and served second amended notice of deposition of Alex Uribe[.3]. Updated caption form to reflect pro hac vice appearance of defense counsel[.1]. Coordinated court reporter and video services for deposition of Uribe[.1].	0.5	\$ 225.00	\$ 112.50

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3/8/2024	KB	Cancelled deposition services for deposition of Uribe[.1].	0.1	\$ 225.00	\$ 22.50
6/18/2024	KB	Drafted motion for preliminary approval shell[.1].	0.1	\$ 225.00	\$ 22.50
6/20/2024	KB	Drafted declaration shell in support of plaintiff's motion for preliminary approval and proposed order[.2].	0.2	\$ 225.00	\$ 45.00
7/1/2024	KB	Drafted joint status report shell regarding settlement[.1].	0.1	\$ 225.00	\$ 22.50
7/16/2024	KB	Drafted proposed order for preliminary approval of settlement[.1]. Drafted proposed order regarding final approval and judgment[.1].	0.2	\$ 225.00	\$ 45.00
7/18/2024	KB	Updated caption form and relevant pleadings to indicate change in address of co-counsel[.1].	0.1	\$ 225.00	\$ 22.50
8/8/2024	KB	Updated declaration in support of preliminary approval to reflect adequacy declaration language[.4].	0.4	\$ 225.00	\$ 90.00
8/13/2024	KB	Updated joint status report to reflect addition of proposed order portion[.1]. Finalized joint status report[.1]. Filed joint status report and provided word version to judge[.1].	0.3	\$ 225.00	\$ 67.50
8/19/2024	KB	Finalized settlement agreement exhibits[.7]. Provided settlement agreement to client through DocuSign for signature of the same[.1]. Formatted document and created table of contents for motion for preliminary approval[.3]. Created fully executed settlement agreement and sent to all counsel[.2]. Created table of authorities for motion for preliminary approval[.7]. Created final exhibits to declaration in support of motion for preliminary approval[.3]. Revised and finalized motion, declaration, and proposed order regarding preliminary approval[.2]. Filed motion for preliminary approval with the court and provided word version of proposed order to judge[.3]. Filed declaration and exhibits in support with the court[.1].	1.1	\$ 225.00	\$ 247.50
8/20/2024	KB	Drafted stipulated motion to extend case deadlines shell[.2].	1.8	\$ 225.00	\$ 405.00
10/16/2024	KB	Formatted stipulated motion to extend case deadlines[.3]. Filed stipulated motion with the court[.1].	0.2	\$ 225.00	\$ 45.00
10/17/2024	KB	Provided word version of stipulated motion to judge[.1].	0.5	\$ 225.00	\$ 112.50
		Statement Professional: Krystal Brown	24.9	\$	5,602.50
4/14/2023	LAM	Researched cellular carriers and their parent companies for subpoenas [0.7].	0.7	\$ 125.00	\$ 87.50
4/17/2023	LAM	Researched registered agents for wireless carriers subpoenas [2.3]. Set up subpoenas for wireless carriers [3.5].	5.8	\$ 125.00	\$ 725.00
4/18/2023	LAM	Helped set up wireless carrier subpoena packages [6].	6	\$ 125.00	\$ 750.00
4/20/2023	LAM	Managed and tracked subpoenas [0.3].	0.3	\$ 125.00	\$ 37.50
4/21/2023	LAM	Managed subpoenas [1.3].	1.3	\$ 125.00	\$ 162.50
4/24/2023	LAM	Researched new addresses for subpoenas to wireless carriers [1.4].	1.4	\$ 125.00	\$ 175.00
4/25/2023	LAM	Managed subpoenas to wireless carriers [1.8].	1.8	\$ 125.00	\$ 225.00
4/28/2023	LAM	Managed wireless carrier subpoenas [0.4].	0.4	\$ 125.00	\$ 50.00
5/1/2023	LAM	Returned potential class member calls re subpoenas [1].	1	\$ 125.00	\$ 125.00
5/3/2023	LAM	Managed subpoenas to wireless carriers [0.4].	0.4	\$ 125.00	\$ 50.00
5/12/2023	LAM	Researched custodians for subpoena enforcement [1.1].	1.1	\$ 125.00	\$ 137.50
6/16/2023	LAM	Called back potential class members re wireless carrier subpoena [0.3].	0.3	\$ 125.00	\$ 37.50
6/23/2023	LAM	Entered wireless caller data into tracker [0.5].	0.5	\$ 125.00	\$ 62.50
6/29/2023	LAM	Updated tracking spreadsheet with Def's subpoenas to lead generators [0.5]. Responded to calls re subpoenas to wireless carriers [0.3]. Updated tracker with new subpoenas to lead generators [0.5].	0.5	\$ 125.00	\$ 62.50
7/12/2023	LAM	Prepared wireless carrier subpoenas [0.9].	0.8	\$ 125.00	\$ 100.00
2/14/2024	LAM	Prepared wireless carrier subpoenas [0.9].	0.9	\$ 125.00	\$ 112.50
2/15/2024	LAM	Prepared subpoenas to wireless carriers [5.4].	5.4	\$ 125.00	\$ 675.00
		Statement Professional: Laura Murray	28.6	\$	3,575.00
5/28/2020	LC	Entered dates into spreadsheet from production documents.[2.5]	2.5	\$ 125.00	\$ 312.50
6/24/2020	LC	Transcribed production voice messages.[1.0]	1	\$ 125.00	\$ 125.00
6/25/2020	LC	Transcribed production voice messages.[1.0]	1	\$ 125.00	\$ 125.00
6/26/2020	LC	Transcribed production voice messages.[1.5]	1.5	\$ 125.00	\$ 187.50
9/16/2020	LC	Transcribed PillPack recorded calls[1.2].	1.2	\$ 125.00	\$ 150.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/17/2020	LC	Transcribed PillPack recorded call[0.9].	0.9	\$ 125.00	\$ 112.50
9/16/2021	LC	Obtained National DNC Registration Emails[0.5].	0.5	\$ 125.00	\$ 62.50
9/27/2021	LC	Pulled/organized dep exs, loaded into I-Pro, worked out loading issues, and sent email communications[3.0].	3	\$ 125.00	\$ 375.00
		Statement Professional: Lauren Carter	11.6		\$ 1,450.00
6/30/2023	MB	Personal meeting regarding research project [.1].	0.1	\$ 250.00	\$ 25.00
7/5/2023	MB	Began research project [.2], email correspondence regarding the same [.1].	0.3	\$ 250.00	\$ 75.00
7/6/2023	MB	Worked on lead generator research project [2.1].	2.1	\$ 250.00	\$ 525.00
7/7/2023	MB	Worked on lead generator research project [6.9]; personal conference regarding the same [.3].	7.2	\$ 250.00	\$ 1,800.00
7/10/2023	MB	Continued lead generator research [7.4].	7.4	\$ 250.00	\$ 1,850.00
7/11/2023	MB	Continued lead generator research project [7.7].	7.7	\$ 250.00	\$ 1,925.00
7/12/2023	MB	Continued lead generator project [3.4].	3.4	\$ 250.00	\$ 850.00
7/13/2023	MB	Lead generator research project [3.9], email correspondence regarding the same [.1].	4	\$ 250.00	\$ 1,000.00
7/24/2023	MB	Researched lead generators [1].	1	\$ 250.00	\$ 250.00
7/25/2023	MB	Completed lead generator research [4.4]; email regarding the same [.1].	4.5	\$ 250.00	\$ 1,125.00
8/14/2023	MB	Corrected citations on lead generator research project [.9].	0.9	\$ 250.00	\$ 225.00
8/15/2023	MB	Corrected citations in lead generator research project [2.2].	2.2	\$ 250.00	\$ 550.00
		Statement Professional: Madison Brown	40.8		\$ 10,200.00
3/2/2020	RKS	Worked on case management notebook.	1	\$ 125.00	\$ 125.00
4/21/2020	RKS	Worked on redaction project.	2.5	\$ 125.00	\$ 312.50
5/18/2020	RKS	Worked on reading over complaint, dep notices, and ROGs resps for dep prep.	1.5	\$ 125.00	\$ 187.50
5/19/2020	RKS	Worked on deposition prep.	4.5	\$ 125.00	\$ 562.50
5/20/2020	RKS	Worked on dep prep.	2	\$ 125.00	\$ 250.00
5/21/2020	RKS	Worked on dep prep.	3	\$ 125.00	\$ 375.00
5/22/2020	RKS	Worked on dep prep.	1	\$ 125.00	\$ 125.00
6/25/2020	RKS	Worked on creating dep notebook for BET.	2.5	\$ 125.00	\$ 312.50
7/22/2020	RKS	Worked on call transcription project.	0.4	\$ 125.00	\$ 50.00
7/23/2020	RKS	Worked on transcription project.	0.2	\$ 125.00	\$ 25.00
8/24/2020	RKS	Worked on gathering dep exhibits.	1	\$ 125.00	\$ 125.00
		Statement Professional: Rebecca Koltin-Shaw	19.6		\$ 2,450.00
3/25/2019	TJM	Telephone conference with Mr. Smith regarding potential TCPA case against PillPack [.2].	0.2	\$ 750.00	\$ 150.00
4/4/2019	TJM	Telephone conference with co-counsel regarding factual background and case strategy issues [.2]; worked on same [.1].	0.3	\$ 750.00	\$ 225.00
4/8/2019	TJM	Worked on conflict check [.1]; worked on joint prosecution agreement [.1]; worked on factual background issues [.2].	0.4	\$ 750.00	\$ 300.00
4/9/2019	TJM	Worked on draft complaint [.2]; telephone conference with co-counsel regarding same [.1]; worked on case management issues [.1]; researched and analyzed issues regarding factual background [.3].	0.7	\$ 750.00	\$ 525.00
5/29/2019	TJM	Participated in team call regarding case strategy issues [.3].	0.3	\$ 750.00	\$ 225.00
8/9/2019	TJM	Worked on case strategy issues [.1].	0.1	\$ 750.00	\$ 75.00
8/29/2019	TJM	Analyzed issues regarding factual background and case strategy [.1].	0.1	\$ 750.00	\$ 75.00
12/27/2021	TJM	Analyzed issues regarding [REDACTED] [7].	0.7	\$ 750.00	\$ 525.00
		Statement Professional: Toby J. Marshall	2.8		\$ 2,100.00
		Total	4043		\$ 2,209,408.00
		Write Offs	-145.2		\$ (34,435.00)
		Net Total	3897.8		\$ 2,174,973.00

EXHIBIT 2

CN: 1920457432

SN: 91

PC: 416

FILED

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TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

FILED

AUG 12 2022

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SPOKANE COUNTY

ISAAC GORDON,

Plaintiff,

v.

ROBINHOOD FINANCIAL LLC,

Defendant.

No. 19-2-04574-32

DECLARATION OF KENNETH
E. PAYSON IN SUPPORT OF
ROBINHOOD FINANCIAL
LLC'S FEE REQUEST AND
SUBSTANTIATION

I, Kenneth E. Payson, declare as follows:

1. **Identity of Declarant.** I am an attorney at the law firm Davis Wright Tremaine LLP ("DWT"), and am counsel of record for Defendant Robinhood Financial LLC ("Robinhood") in this action. I make this declaration based on personal knowledge or information provided to me by DWT personnel working under my supervision.

2. **Identities of Attorneys Who Performed Legal Work for Robinhood in This Matter.** The primary attorneys who performed the legal work for which Robinhood seeks to recover fees in its Motion for Attorneys' Fees (Dkts. 34, 35) are myself, Lauren B. Rainwater, and Eric A. Franz. The primary paralegals who performed legal work are Sarah Hebard and Ericka Mitterndorfer. Several other attorneys, paralegals, and staff performed additional work on discrete projects as staffing needs required.

1 3. I am a partner in the Seattle office of DWT and have served as lead counsel for
2 Robinhood in this action. DWT is a full-service firm with approximately 620 lawyers in ten
3 offices throughout the United States. My practice at DWT focuses on class action litigation,
4 including defending so-called “blast text” and robocall class actions involving claims under the
5 federal Telephone Consumer Protection Act and similar state laws such as Washington’s
6 Commercial Electronic Mail Act. I co-chair the firm’s Class Action Defense Group. I have a
7 nationwide practice and have appeared in more than 20 different jurisdictions across the country.
8 I have been named one of the “Best Lawyers in America” in Commercial Litigation by Best
9 Lawyers from 2013 to the present. I am a 1996 graduate of the University of California,
10 Berkeley School of Law and previously served as an adjunct law professor at Seattle University
11 School of Law and law clerk to former Chief Justice Barbara Durham of the Washington State
12 Supreme Court. I believe the work I performed on this case was both reasonable and necessary.
13 My work on this case was billed to Robinhood at the hourly rate of \$745.00 per hour in 2019;
14 \$775.00 in 2020; \$805.00 in 2021; and \$855.00 in 2022. These rates are the same as or similar
15 to those charged to other clients of the firm during the same time periods. Based on my
16 experience, these rates are similar to rates regularly charged by lawyers with similar credentials,
17 training, experience, and seniority at comparable firms performing comparable work during the
18 same time periods.

19 4. Lauren B. Rainwater is a partner at the Seattle office of DWT, with extensive
20 experience in class action litigation. She is a 2010 graduate of Cornell Law School and
21 previously served as a law clerk for Judge John C. Coughenour in the United States District
22 Court for the Western District of Washington. I believe the work Ms. Rainwater performed on
23 this case was both reasonable and necessary. Her work on this case was billed to Robinhood at
24 the hourly rate of \$495.00 per hour in 2019; \$525.00 in 2020; \$560.00 in 2021; and \$635.00 in
25 2022. These rates are the same as or similar to those charged to other clients of the firm during
26 these time periods. Based on my experience, these rates are similar to rates regularly charged by
27

1 lawyers with similar credentials, training, experience, and seniority at comparable firms
2 performing comparable work during the same time periods.

3 5. Eric A. Franz is an associate in the litigation group at DWT, with substantial
4 experience in class action litigation. He is a 2017 graduate of the University of Washington
5 School of Law and previously served as a law clerk for Judge James L. Robart in the United
6 States District Court for the Western District of Washington. I believe the work Mr. Franz
7 performed on this case was both reasonable and necessary. His work on this case was billed to
8 Robinhood at the hourly rate of \$420.00 in 2020; \$465.00 in 2021; and \$535.00 in 2022. These
9 rates are the same as or similar to those charged to other clients of the firm during these time
10 periods. Based on my experience, these rates are similar to rates regularly charged by lawyers
11 with similar credentials, training, experience, and seniority at comparable firms performing
12 comparable work during the same time periods.

13 6. The additional attorneys who performed legal work on this case for which
14 Robinhood was billed are Sarah Caruana (14.7 hours billed, \$510.00 per hour); Bruce E.H.
15 Johnson (0.2 hours billed, \$845.00 per hour); Sara Fairchild (0.6 hours billed, \$450.00 per hour);
16 Rachel Herd (3.9 hours billed, \$455.00 per hour); Rose McCarty (5.6 hours billed, \$425.00 per
17 hour); Jordan Harris (35.5 hours billed, \$395.00 per hour); Ben R. Robbins (85.9 hours billed,
18 \$375.00 per hour); Lauren Dorsett (3.9 hours billed, \$490.00 per hour); and Alicia LeDuc (55.3
19 hours billed, \$400.00 per hour). I believe the work these attorneys performed on this case was
20 both reasonable and necessary. These rates are the same as or similar to those charged to other
21 clients of the firm during these time periods. Based on my experience, these attorneys' rates
22 were similar to rates regularly charged by lawyers with similar credentials, training, experience,
23 and seniority at comparable firms performing comparable work during the time periods these
24 attorneys performed legal work on this case. Attached as **Exhibits 1–12** are copies of the
25 resumes of each of the attorneys discussed in paragraphs 3–6 above.

26 7. ***Plaintiff's Counsel and Their Comparable Billing Rates.*** Plaintiff's counsel
27 Kirk D. Miller had identified in filings with this Court that his firm is located in Spokane,

1 Washington. In a CEMA-based class action in which Plaintiff's counsel Kirk D. Miller
2 represented plaintiffs, he declared that "[a] reasonable hourly rate for my class action contingent
3 fee cases in western Washington is \$625.00 per hour" for work completed in 2020 through 2022.
4 *Hillman v. Evergreen Market (Auburn), Inc.*, No. 20-2-09385-8 SEA, Dkt. 38 (King Cnty. Sup.
5 Ct. Apr. 25, 2022) (Ex. 14 at 74 ¶ 24). In that matter, Mr. Miller also asserted that Brian
6 Cameron's hourly rate was \$550.00 per hour for work completed in 2020 and 2021. *See id.* at
7 81. Mr. Miller and Mr. Cameron sought a total of \$300,000 in fees, with a lodestar of
8 \$112,609.17, for a matter that settled before the parties completed any discovery and before any
9 motion practice occurred. *See id.* Dkts. 37 & 40 (Exs. 13 & 16). Attached as **Exhibits 13–17** are
10 true and correct copies of filings from that matter referenced in this paragraph, with relevant
11 portions highlighted.

12 8. In two other class actions in which Plaintiff's counsel Kirk D. Miller represented
13 plaintiffs, Mr. Miller sought fees at an hourly rate of \$525.00 in 2021. *Morris v. FPI Mgmt.,*
14 *Inc.*, No. 2:19-cv-0128-TOR, Dkt. 46 (E.D. Wash. Nov. 12, 2021) (Ex. 19 at 146 ¶ 23); *see also*
15 *id.* Ex. 18 at 124 (seeking a combined \$400,000 in attorneys' fees in a CEMA-based class
16 settlement); *Daley v. Greystar Real Estate Partners, LLC*, No. 2:18-cv-00381-SMJ, Dkt. 137
17 (E.D. Wash. Aug. 28, 2021) (Ex. 20 at 152) (seeking a total \$625,000 in attorneys' fees in a class
18 settlement). In the *Daley* matter, Plaintiff's counsel Brian Cameron sought fees at an hourly rate
19 of \$425.00 per hour. *Id.* Ex. 21 at 171 ¶¶ 11–12. Mr. Miller is a 2007 graduate of the Gonzaga
20 School of Law. Ex. 19 at 142 ¶ 4. According to his LinkedIn profile, Mr. Cameron is a 2011
21 graduate of the Gonzaga School of Law. Attached as **Exhibits 18–22** are true and correct copies
22 of the filings referenced in this paragraph and a copy of Mr. Cameron's LinkedIn profile, with
23 relevant portions highlighted. Exhibits 18 and 20 have been excerpted to reflect only relevant
24 portions of those documents.

25 9. Thus, Mr. Miller's and Mr. Cameron's years of practice and hourly rates are
26 comparable with those of Ms. Rainwater.

1 10. Plaintiff's former lead counsel for part of the Eastern District of Washington
2 proceedings, Eleanor Michelle Drake, had identified in filings with that court that her office is
3 located in Minneapolis, Minnesota. In 2022, Ms. Drake represented plaintiffs in a class action
4 settlement and sought fees at an hourly rate of \$920.00 and argued that this rate (among many
5 others) was "reasonable," had "been approved repeatedly in courts throughout the country," and
6 was "commensurate with rates charged by other attorneys in national class action consumer
7 protection litigation." *Stewart v. LexisNexis Risk Data Retrieval Servs., LLC*, No. 3:20-cv-
8 00903-JAG, Dkt. 76 (E.D. Va. June 9, 2022) (Ex. 23 at 191, 201-02) (seeking a total of \$2.6
9 million in attorneys' fees). Likewise, in 2021, Ms. Drake represented plaintiffs in a class action
10 settlement and sought fees at an hourly rate of \$820.00. *Pang v. Credit Plus, Inc.*, No. 1:20-cv-
11 00122-ELH, Dkt. 55-1 (D. Md. Sept. 21, 2021) (Ex. 24 at 206, 219 & n.6) (seeking a total of
12 \$300,000 in attorneys' fees in class action settlement); *id.* Ex. 25 at 226 (declaration setting forth
13 rates). According to her firm biography, Ms. Drake is a 2001 graduate of Harvard Law School.
14 Attached as **Exhibits 23-26** are true and correct copies of the filings referenced in this paragraph
15 and a copy of Ms. Drake's firm biography, with relevant portions highlighted.

16 11. While I have been practicing law for five more years than Plaintiff's former
17 counsel Ms. Drake, Ms. Drake has sought fees at an hourly rate exceeding mine.

18 12. ***Identities of Paralegals and Other Staff Who Performed Legal Work for***
19 ***Robinhood in This Matter.*** Sarah Hebard was a paralegal at DWT until July 2021, and has
20 extensive experience with class action litigation. She is a 2005 graduate of University of
21 California, Santa Cruz. I believe the work Ms. Hebard performed on this case was both
22 reasonable and necessary. Her work on this case was billed to Robinhood at the hourly rate of
23 \$325.00 in 2020 and \$340.00 in 2021. These rates are the same as or similar to those charged to
24 other clients of the firm during these time periods. Based on my experience, these rates are
25 similar to rates regularly charged by paralegals with similar credentials, training, experience, and
26 seniority at comparable firms performing comparable work during the same time periods.

1 13. Ericka Mitterndorfer is a paralegal at DWT with over 25 years of litigation
2 experience, including extensive experience with class action litigation. She obtained her
3 Certificate in Paralegal Studies at Edmonds Community College in 1996. I believe the work Ms.
4 Mitterndorfer performed on this case was both reasonable and necessary. Her work in 2021 on
5 this case was billed to Robinhood at the hourly rate of \$355.00, and her work in 2022 on this
6 case was billed to Robinhood at the hourly rate of \$380.00. These rates are the same as or
7 similar to those charged to other clients of the firm during these time periods. Based on my
8 experience, this rate is similar to rates regularly charged by paralegals with similar credentials,
9 training, experience, and seniority at comparable firms performing comparable work during the
10 same time periods.

11 14. The additional paralegals who performed legal work on this case for which
12 Robinhood was billed are Stephanie Childs (1.2 hours billed at \$340.00 per hour); Carla
13 Jutamakasame (5.7 hours billed at \$355.00 per hour); Nara Neves (.8 hours billed at \$320.00 per
14 hour and 19.9 hours billed at \$355.00 per hour); Jason A. Schattenkerk (2.6 hours billed at
15 \$255.00 per hour); Nicole Greene (4.5 hours billed at \$380.00 per hour); and Jodi Savitsky (3.4
16 hours billed at \$320.00 per hour). I believe the work these paralegals performed on this case was
17 both reasonable and necessary. These rates are the same as or similar to those charged to other
18 clients of the firm during these time periods. Based on my experience, these rates are similar to
19 rates regularly charged by paralegals with similar credentials, training, experience, and seniority
20 at comparable firms for comparable work during the same time periods.

21 15. The research staff who performed legal work on this case for which Robinhood
22 was billed are Jason J. Callan (0.4 hours billed at \$280.00 per hour, 0.2 hours billed at \$295.00
23 per hour, and 2.4 hours billed at \$310.00 per hour); Jennifer Dollar (4.1 hours billed at \$295.00
24 per hour and 2.8 hours billed at \$310.00 per hour); Erica Hemmen (0.9 hours billed at \$295.00
25 per hour and 0.9 hours billed at \$310.00 per hour); Bret Masterson (2.4 hours billed at \$295.00
26 per hour, 6.3 hours billed at \$310.00 per hour, and 1.1 hours billed at \$330.00 per hour); Stacey
27 Shelton (0.8 hours billed at \$295.00 per hour); Rachel McMillen Pratt (2 hours billed at \$310.00

per hour); and Laurie Daley (2.3 hours billed at \$295.00 per hour and 4 hours billed at \$310.00 per hour). I believe the work these research staff members performed on this case was both reasonable and necessary. These rates are the same as or similar to those charged to other clients of the firm during these time periods. Based on my experience, these rates are similar to rates regularly charged by research staff with similar credentials, training, experience, and seniority at comparable firms for comparable work during the same time periods.

16. My belief that the rates of the attorneys, paralegals, and research staff on this case are reasonable is supported by the concurrently filed Declaration of Brian Fanning, DWT’s Director of Client Services and Pricing, who manages the process of setting billing rates for DWT personnel.

17. *Summary of Hours Worked and Amount Billed to Robinhood.* Below is a table summarizing the hours worked and amount billed for the attorneys, paralegals, and research staff who performed work in this case, totaling Robinhood’s requested amount of **\$1,248,862.62**.

Name	Position	Hours Billed	Fees Billed
Kenneth E. Payson	Partner, Lead Counsel	619.3	\$477,097.19
Lauren B. Rainwater	Partner	542.6	\$282,775.90
Eric A. Franz	Associate	872.6	\$391,348.50
Additional Attorneys	Partners & Associates	205.6	\$51,490.95
Total Fees for Attorney Work: \$1,202,712.54			
Sarah Hebard	Paralegal	35.6	\$11,667.00
Ericka Mitterndorfer	Paralegal	36.7	\$13,145.91
Additional Paralegals	Paralegals	38.1	\$12,267.17
Total Fees for Paralegal Work: \$37,080.08			

Research Staff	Research Staff	30.6	\$9,070.00
Total Fees for Research Staff Work: \$9,070.00			
<u>TOTAL REQUESTED: \$1,248,862.62</u>			

18. *Summary of Hours Worked and Amount Billed to Robinhood by Phase.* Below is a table that summarizes the hours worked and amount billed in each phase of the case.

Initial Filing in Spokane County Superior Court

Phase Number	Description	Hours Billed	Fees Billed
1.1	Initial Investigation	12.7	\$6,012.50

Removal to Eastern District of Washington

Phase Number	Description	Hours Billed	Fees Billed
2.1	Removal and CAFA jurisdictional briefing	83.1	\$45,878.00
2.15	Motions to dismiss, answer, and initial steps in federal court ¹	252.2	\$90,026.50
2.2	Rule 26(f) conference, joint status report, and initial disclosures	19.2	\$10,152.50
2.3	Class certification opposition	187.4	\$97,301.00
2.4	Pre-stay fact discovery, investigation (including the work that uncovered Plaintiff's misconduct), and potential class notice	465.6	\$265,142.00
2.5	Motion to stay and related filings	106.8	\$55,891.50

¹ Robinhood excluded from this calculation fees incurred preparing a motion to dismiss Robinhood Markets, Inc. for lack of personal jurisdiction, as Robinhood Markets previously recovered the fees incurred on that motion.

2.6	Post-stay party discovery and discovery motions	139.8	\$73,270.50
2.7	Post-stay third-party discovery and related motions re: Plaintiff's misconduct, including opposing two motions to modify a subpoena and four motions to quash, and preparing and filing four motions to compel	305.5	\$157,726.00
2.8	Motions to withdraw and substitute (Plaintiff's counsel and Plaintiff)	69.4	\$38,584.50
2.9	Motion to decertify class / disqualify Plaintiff's counsel and motion for reconsideration	232.6	\$129,433.00

Remand to Spokane County Superior Court

Phase Number	Description	Hours Billed	Fees Billed
3.1	Motion to stay and related motions and strategy	55.7	\$33,374.38
3.2	Motion for CR 60 relief and motion for reconsideration and appeal of same	130.2	\$71,656.74
3.3	Response to motion to clarify in federal court	42	\$23,170.50
3.4	Motion for attorneys' fees and CR 11 sanctions	283.5	\$151,243.00

19. Not included in the amount of requested fees are:

a. Hours billed for work Robinhood performed on its successful motion to dismiss Plaintiff's claim against Robinhood Markets, Inc. ("RHM") for lack of personal jurisdiction. The federal court granted in part Robinhood's motion for attorneys' fees and awarded Robinhood \$7,965.00 for those hours. *See Gordon v. Robinhood Financial LLC*, No. 19-0390, Dkt. 29 (E.D. Wash. Apr. 1, 2020).

b. Hours worked by attorneys, paralegals, and research staff for which DWT did not bill Robinhood. In total, DWT recorded 202.9 hours of billable work on the matter

1 totaling \$95,275.50 in legal services that was not billed to Robinhood. These time entries are
2 included in the detailed accounting of DWT's legal services in this matter attached as **Exhibits**
3 **27-41** but show \$0.00 in the "BilledAmount" column, with the unbilled value showing in the
4 "WorkAmount" column.

5 c. Hours billed for work performed by Robinhood's local counsel at
6 Witherspoon Kelley.

7 20. ***Detailed Accounting of Legal Services Billed to Robinhood.*** Attached as
8 **Exhibits 27-41** are a detailed accounting of the legal services our firm provided to and billed
9 Robinhood for in this case. These exhibits are derived from the contemporaneous records of
10 attorney time maintained by our firm, which have been revised to (a) redact client confidences,
11 work product, and privileged matters, and (b) to remove the above-described hours billed for
12 work Robinhood performed on its successful motion to dismiss Plaintiff's claim against RHM.
13 The time entries on these exhibits accurately summarize the services DWT performed for
14 Robinhood in this case, and all the time in the "Billed Amount" column was billed to Robinhood.
15 The exhibits have further been broken down into subparts based on the phases referenced in
16 Paragraph 18, with the total fees billed to Robinhood for each phase included at the bottom of the
17 "BilledAmount" column.

18 21. ***Discussion of the Substantial Amount of Work Performed in This Case.*** The
19 time DWT's attorneys, paralegals, and staff spent on this case was justified by the nature of the
20 claim; the complex factual, legal, and procedural issues involved; and the result obtained. This is
21 particularly so where much of the work my firm undertook in this case was necessary to
22 understand, expose, and correct the litigation misconduct that this Court and the federal district
23 court found that Plaintiff and his counsel committed.

24 22. Plaintiff's claim was novel in that at the time it was filed, few if any plaintiffs had
25 filed CEMA cases based on refer-a-friend text messages sent not by a defendant but by a
26 defendant's nonparty customers. Plaintiff's counsel Kirk D. Miller claims that this legal theory
27 was "developed by my firm and my co-counsel at Cameron Sutherland, PLLC." Dkt. 63 ¶ 11.

1 Given that paucity of case law interpreting CEMA, defending this case during its initial stages
2 required advanced legal research, analysis, and expertise in assessing analogous statutory
3 schemes to navigate successfully and to carefully assess the level of risk of potential liability and
4 financial exposure to Robinhood.

5 23. Robinhood was forced to expend significant time and resources opposing class
6 certification and then defending against the claims of a certified class of several hundred
7 thousand Washington residents before Plaintiff's and his counsel's misconduct came to light.

8 24. Discovery throughout this case was complex. After the class was certified, early
9 discovery to Robinhood centered around the detailed and highly technical process through which
10 certain Robinhood in-App activity was and is recorded and stored. Plaintiff's discovery requests
11 sought massive quantities of highly technical data, records from Robinhood's databases and
12 systems, and a deposition of one of Robinhood's data scientists. Significant time was required to
13 interface with Robinhood's data scientists, engineers, and other employees to prepare and
14 provide accurate discovery responses and testimony about Robinhood's records, databases, and
15 systems. Significant time was also required to negotiate and pull a list of Robinhood customers
16 that Plaintiff sought to present to the Court as a class list for purposes of class notice, and to
17 evaluate Plaintiff's class notice proposal.

18 25. Just before class notice was to be sent, on April 29, 2021, after a year and a half
19 of litigation, Plaintiff served discovery responses that claimed he was "uncertain" as to the
20 identity of those who sent him Robinhood referral text messages but included the phone number
21 and the Robinhood referral code included in those text messages. This information was not
22 previously available to Robinhood. Robinhood's counsel's subsequent investigation—including
23 review and analysis of several sets of detailed Robinhood records—uncovered in less than two
24 weeks that (a) Plaintiff's counsel's brother and son's friend sent the text messages at issue;
25 (b) that Plaintiff's counsel Brian Cameron sent Robinhood referral text messages to his brother
26 John Cameron, through which John Cameron set up a Robinhood account; (c) that John Cameron
27 in turn sent to Plaintiff one of the referral text messages, which in fact was the text message

1 Plaintiff identified in his Complaint; (d) that Brian Cameron sent a referral link to his son, Ewan
2 Cameron; (e) that Ewan Cameron opened a Robinhood account and, the next day, initiated a
3 referral text to Gordon; and (f) that the other text message Gordon identified was received from
4 Nathan Budke, Ewan Cameron's high school classmate and friend on social media, and a repeat
5 client of Brian Cameron in spurious CEMA lawsuits. Robinhood's counsel then filed a
6 successful motion to stay class discovery and class notice on the basis that Plaintiff's claim was
7 manufactured by Plaintiff and his counsel. This investigation and motions practice was the first
8 step in decertifying the class, and saved Robinhood countless tens of thousands of dollars in
9 additional fees it would have incurred in continued defense of Plaintiff's certified class action.

10 26. Robinhood's counsel then conducted discovery from Plaintiff and from the third
11 parties involved in manufacturing Plaintiff's claim, including subpoenas to Nathan Budke, Ewan
12 Cameron, and John Cameron. This discovery was vigorously contested resulting in extensive
13 motions practice, including multiple motions to compel and responses to motions to quash.
14 While these discovery motions were pending, Robinhood's counsel prepared a successful motion
15 to decertify the class.

16 27. Robinhood's counsel then navigated difficult procedural questions when the
17 federal court remanded this case *sua sponte* to this Court, and Plaintiff and his counsel quickly
18 obtained a dismissal without prejudice without notice to Robinhood. After the federal court
19 remanded to this Court, Robinhood filed a motion to stay to prevent Plaintiff from voluntarily
20 dismissing the case. While the motion to stay was pending, Plaintiff voluntarily dismissed the
21 case to avoid a judgment on the merits and other adverse consequences—a mechanism that
22 Plaintiff's counsel previously routinely utilized whenever similar alleged misconduct was
23 discovered in other cases. Robinhood was then forced to file a motion for relief from a judgment
24 to obtain a dismissal with prejudice. Addressing these issues required significant additional
25 briefing, including a motion for reconsideration and a motion for clarification filed by Plaintiff
26 with the federal court.

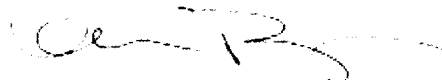
1 28. The work described above resulted in findings by both the federal court and this
2 Court that Plaintiff's claim was frivolous from the start and dismissal of Plaintiff's claims with
3 prejudice, an unqualified success for Robinhood, particularly given the risk to Robinhood that as
4 alleged—if Plaintiff's misconduct were not uncovered—Robinhood could have faced millions of
5 dollars in potential exposure.

6 29. The foregoing is but a partial summary of the work DWT performed in this
7 matter. Attached as **Exhibit 42** is a true and correct copy of the 229 docket entries from the
8 federal district court proceedings in this matter. And the Court is well aware of the 87 docket
9 entries in these state court proceeding.

10 30. ***The Court of Appeals' July 29, 2022 Order.*** On July 29, 2022, the Court of
11 Appeals confirmed that it has stayed consideration of Plaintiff's appeal pending this Court's
12 ruling on the amount of attorneys' fees owed by Plaintiff and his counsel. Attached as
13 **Exhibit 43** is a true and correct copy of that order with relevant portions highlighted.

14 I declare under penalty of perjury that the foregoing is true and correct to the best of my
15 knowledge.

16 Executed on this 12th day of August, 2022, in Seattle, Washington.

17
18 

19
20 _____
Kenneth E. Payson

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the state of Washington, that on the 12th day of August, 2022, the foregoing was delivered to the following persons in the manner indicated:

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WITHERSPOON · KELLEY


Alicia Asplint, Legal Assistant