

THE HONORABLE DAVID G. ESTUDILLO

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

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 WALTER SMITH IN  
SUPPORT OF PLAINTIFF’S MOTION FOR  
ATTORNEYS’ FEES, COSTS, AND SERVICE  
AWARD**

I, Walter Smith, hereby declare as follows:

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

**A. Background and experience**

2. I graduated with honors from the University of Washington School of Law in 2013, and was admitted to the Washington State Bar Association the same year. Since then, I have been admitted to practice before the United States District Courts for the Eastern and Western Districts of Washington, the United States Court of Appeals for the Ninth Circuit, and the United States Bankruptcy Court for the Western District of Washington. I have appeared pro hac vice in a federal District Court case in Louisiana. I remain in good standing in every court to which I am admitted to practice.

1           3.       I was an Assistant Attorney General for the State of Washington Attorney  
2 General's Office from 2014 to 2017 in the office's Medicaid Fraud Control Unit and Campaign  
3 Finance Unit. I represented the State in qui tam litigation and managed investigations of alleged  
4 frauds against the Washington Medicaid program by pharmaceutical companies, durable  
5 medical equipment providers, health care professionals and other entities billing Medicaid for  
6 products and services. I worked often in close collaboration with the United States Department  
7 of Justice and U.S. Attorney's Offices around the country. I later served in a team that  
8 represented the State in civil proceedings to enforce Washington's campaign finance laws.

9           4.       In 2017, I co-founded Smith & Dietrich Law Offices, PLLC, a law firm in Olympia,  
10 Washington focused on protecting consumers in individual and class action lawsuits.

11           5.       I have significant experience in consumer protection investigations and  
12 representation. In law school, I was awarded the Janet D. Steiger Fellowship by the American  
13 Bar Association to fund my work in summer 2012 for the Washington Attorney General's Office  
14 Consumer Protection and Antitrust Divisions as a law clerk. I also served as an extern in the  
15 Federal Trade Commission's Northwest Regional Office in Seattle working on consumer  
16 protection and antitrust investigations and enforcement matters, and as an extern for United  
17 States Bankruptcy Judge Karen Overstreet. In addition to TCPA litigation, my law practice since  
18 2017 with my current firm includes advising and representing consumers in disputes with  
19 financial institutions, manufacturers, and retailers concerning consumer protection and  
20 warranty claims, as well as fraud or consumer protection cases arising from construction  
21 contracts and financial and real estate transactions.

22           6.       Following the opening of my present firm, I have advised and represented  
23 numerous consumer clients across Washington concerning a diverse range of legal disputes,  
24 and helped to recover millions of dollars on our clients' behalf. I have volunteered through  
25 Thurston County Volunteer Legal Services' legal advice clinic and I have represented clients  
26 referred by that organization and by the pro bono panel at the Western District of Washington

1 in housing, civil rights, and other legal disputes. I have presented at continuing legal education  
2 seminars about consumer law topics sponsored by TCCLS. I regularly provide low-bono or  
3 contingent fee structures to my consumer clients who often cannot afford the current market  
4 rate for legal services. Since 2020, my law firm provided legal services at no charge to our  
5 clients for well over one hundred benefits claimants challenging adverse decisions of the  
6 Washington Employment Security Department, thanks to a partnership with the Washington  
7 Office of Civil Legal Aid and the Unemployment Law Project, a non-profit civil legal aid  
8 organization. I am one of a relatively small number of practitioners in my geographic area  
9 whose legal practice focuses on consumer protection advocacy.

10 7. My firm's experience litigating class action claims on behalf of plaintiffs includes  
11 the following cases in which Washington courts approved final settlement and awarded  
12 attorney fees to plaintiffs' counsel, including our firm: *Diel v. Salal Credit Union*, No. 19-2-  
13 10266-7 KNT (King Co. Super. Ct. final approval order in class action settlement entered Aug.  
14 28, 2020); *Marical v. Boeing Employees' Credit Union*, No. 19-2-20417-6 KNT (King Co. Super. Ct.  
15 final approval order in class action settlement entered Sept. 27, 2021); and *Fealy v. Sound*  
16 *Credit Union*, No. 20-2-04853-0 (Pierce Co. Super. Ct. final approval order in class action  
17 settlement dated Sept. 16, 2022 approving attorney fees equal to one-third of common fund  
18 recovery).

19 8. My law partner, Steve Dietrich, was an Assistant Attorney General for the State  
20 of Washington for 23 years before co-founding Smith & Dietrich Law Office. He graduated from  
21 the University of Washington School of Law in 1992, was a member of the Order of the Coif and  
22 the editorial staff of the Washington Law Review. He clerked for the Honorable Joseph  
23 Thibodeau of the Snohomish County Superior Court after graduating from law school.

24 **B. Smith & Dietrich's lodestar and litigation costs**

25 9. Smith & Dietrich has devoted well over 500 hours to litigating this matter since  
26 March 2019, working with no guarantee of being compensated for its time and efforts.

1 Payment of the firm's fees has been contingent on successfully obtaining relief for the plaintiff  
 2 and class members. As a result, there was a substantial risk of non-payment, particularly in light  
 3 of the challenges inherent in this type of case. Work on this case has necessarily been to the  
 4 exclusion of work on other matters that likely would have generated fees. Smith & Dietrich has  
 5 also been denied use of the fees it earned over the course of this case.

6 10. A spreadsheet that compiles the contemporaneously maintained billing records  
 7 for Smith & Dietrich is attached as **Exhibit 1**. I have reviewed these billing records and reduced  
 8 and eliminated time that was administrative in nature, or that appeared to be redundant or  
 9 inefficient. It is my firm belief that the time billed was reasonably necessary to litigate this case  
 10 and secure a settlement on behalf of the plaintiff and the class.

11 11. Throughout the litigation, I have been the primary point of contact for the class  
 12 representative, with whom I worked to verify the accuracy of the allegations in the complaint  
 13 and amended complaint; to complete third party subpoenas for cellular telephone records and  
 14 written responses to discovery and documentary production; and to prepare for his deposition  
 15 and complete a device inspection at the demand of Defendant. I have worked in tandem with  
 16 my co-counsel throughout this litigation, including participating in drafting pleadings and  
 17 documents related to discovery, review and analysis of factual and legal issues in the case, and  
 18 strategic decision making about the prosecution of the case.

19 12. Smith & Dietrich has incurred unreimbursed out-of-pocket litigation expenses  
 20 totaling \$155.00. The following chart summarizes Smith & Dietrich's litigation costs:

Category of Expense	Total
PACER charges	112.60
Mailing/shipping costs	42.35
<b>TOTAL</b>	<b>155.00</b>

1 I declare under penalty of perjury under the laws of the State of Washington that  
2 foregoing is true and correct.

3 EXECUTED at Olympia, Washington this 19<sup>th</sup> day of November, 2024.

4  
5 /s/ Walter Smith  
6 Walter Smith, WSBA No. 46695  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

# EXHIBIT 1

Date	Timekeeper	Narrative	Units	Rate	Value
4/11/2019	Steve E Dietrich	Reviewed draft complaint and reviewed call recordings.	0.8	\$650.00	\$520.00
5/29/2019	Steve E Dietrich	Review letter from DWT and settlement offer. Review district court case involving certification of similar class in similar multilevel marketing structure as ours.	0.8	\$650.00	\$520.00
5/30/2019	Steve E Dietrich	Telephone call with opposing counsel, Beth and Jennifer. [REDACTED]	1.5	\$650.00	\$975.00
6/1/2019	Steve E Dietrich	Read additional case law re: [REDACTED]. Draft email to Walter with thoughts and excerpts.	1.6	\$650.00	\$1,040.00
6/3/2019	Steve E Dietrich	Review available business history of PillPack from 2013 founding to 2018 purchase by Amazon (shortly after contract with Mark Dorf entity).	1	\$650.00	\$650.00
6/3/2019	Steve E Dietrich	Research [REDACTED]. Review and comment on memo re: [REDACTED].	1.5	\$650.00	\$975.00
6/4/2019	Steve E Dietrich	[REDACTED].	1	\$650.00	\$650.00
6/5/2019	Steve E Dietrich	CR 26(f) conference call with co-counsel and Davis Wright (opposing counsel). Research re: [REDACTED].	0.5	\$650.00	\$325.00
6/5/2019	Steve E Dietrich	Research on [REDACTED].	2	\$650.00	\$1,300.00
6/6/2019	Steve E Dietrich	Read cases involving [REDACTED].	1	\$650.00	\$650.00
6/27/2019	Steve E Dietrich	Monitor PillPack litigation updates and new cases on vicarious TCPA liability.	0.8	\$650.00	\$520.00
7/2/2019	Steve E Dietrich	Review status of CR 26(f) issues with Walter and provide input to proposed case scheduling order/bifurcation issue.	0.8	\$650.00	\$520.00
7/15/2019	Steve E Dietrich	Discussion with Walter about discovery issues.	0.8	\$650.00	\$520.00
7/19/2019	Steve E Dietrich	Initial review of PillPack responses and objections to our first discovery requests. Read [REDACTED]. Discuss with WS relevant	1.1	\$650.00	\$715.00
7/22/2019	Steve E Dietrich	points for CR 26 conference request letter.	0.8	\$650.00	\$520.00
7/27/2019	Steve E Dietrich	Conducted legal research to help prepare discovery plan.	2.5	\$650.00	\$1,625.00
8/7/2019	Steve E Dietrich	Review and comment on draft discovery letter to DWT.	0.4	\$650.00	\$260.00
8/14/2019	Steve E Dietrich	Strategy discussion with Walter regarding [REDACTED]. Review initial email production from Mark Dorf (Performance Media Strategies). Internet research on [REDACTED].	0.5	\$650.00	\$325.00
8/29/2019	Steve E Dietrich	[REDACTED]	2.3	\$650.00	\$1,495.00
9/4/2019	Steve E Dietrich	Review JPA and discuss with Walter; review Walter's summary of status for Jennifer and discuss tactics.	0.8	\$650.00	\$520.00
9/7/2019	Steve E Dietrich	Reviewed initial production by Prospects DM and summaries/memos by Walter and Anthony.	0.8	\$650.00	\$520.00
9/11/2019	Steve E Dietrich	Review supplemental production by Dorf. Team strategy correspondence.	1	\$650.00	\$650.00
9/13/2019	Steve E Dietrich	Attn to discovery issues and consult with Walter.	0.3	\$650.00	\$195.00
9/18/2019	Steve E Dietrich	Review first production installment from PillPack. Note relevant evidence to case file.	1	\$650.00	\$650.00
9/26/2019	Steve E Dietrich	Attention to latest PillPack production. Web research regarding various industry terminology. Email correspondence with co-counsel re: same and calling records follow-up. Review Walter's draft CR 26 letter to PP.	1.5	\$650.00	\$975.00
9/27/2019	Steve E Dietrich	Discuss sj arguments and useful evidence with Walter.	1	\$650.00	\$650.00
9/27/2019	Steve E Dietrich	Review initial production of phone records from Prospects and correspondence with co-counsel.	0.8	\$650.00	\$520.00
9/28/2019	Steve E Dietrich	Review and approve proposed stipulated case schedule.	0.3	\$650.00	\$195.00
9/29/2019	Steve E Dietrich	Draft sj response fact section outline (narrative)	4	\$650.00	\$2,600.00
10/5/2019	Steve E Dietrich	Attention to co-counsel correspondence regarding depositions and subpoenas and next steps.	0.5	\$650.00	\$325.00
10/6/2019	Steve E Dietrich	Research into [REDACTED]	0.4	\$650.00	\$260.00
10/11/2019	Steve E Dietrich	Telephone call with DWT and co-counsel on discovery matters.	1	\$650.00	\$650.00
10/14/2019	Steve E Dietrich	Work on outline for summary judgment opposition.	1.5	\$650.00	\$975.00
10/21/2019	Steve E Dietrich	Review latest PillPack discovery and co-counsel notes.	0.8	\$650.00	\$520.00
10/22/2019	Steve E Dietrich	Update sj narrative with latest information from productions.	0.8	\$650.00	\$520.00

Date	Timekeeper	Narrative	Units	Rate	Value
10/24/2019	Steve E Dietrich	Review emails from co-counsel regarding consent data and follow-up. Research into [REDACTED]	0.4	\$650.00	\$260.00
11/14/2019	Steve E Dietrich	Review draft Dorf declaration and provide comment to Walter.	0.4	\$650.00	\$260.00
2/5/2020	Steve E Dietrich	Continued to conduct legal research into core merits issues.	2	\$650.00	\$1,300.00
2/12/2020	Steve E Dietrich	Review Byte Success declaration and discuss deposition plans with Walter.	0.3	\$650.00	\$195.00
3/3/2020	Steve E Dietrich	Attention to letter from DWT regarding 30(b)(6) objections and report that DWT doesn't want to do depositions in Utah due to corona virus travel fears. Attention to PillPack production number 8 and 9 and discuss with Walter.	1.5	\$650.00	\$975.00
3/23/2020	Steve E Dietrich	Review and edit draft Rule 26 meet and confer letter.	0.4	\$650.00	\$260.00
3/30/2020	Steve E Dietrich	Review draft expert reports and inter-counsel correspondence. Supply questions/suggestions to Walter for consideration by the team.	1.1	\$650.00	\$715.00
4/15/2020	Steve E Dietrich	Review draft Plaintiff's rog and rfp responses and edit. Discuss with Walter.	0.8	\$650.00	\$520.00
5/18/2020	Steve E Dietrich	Review recent case law and update narrative. Work on outline for Swindle deposition.	2.5	\$650.00	\$1,625.00
5/22/2020	Steve E Dietrich	Telephone call with co counsel for deposition prep.	0.5	\$650.00	\$325.00
5/29/2020	Steve E Dietrich	Attended deposition of Swindle.	4.5	\$650.00	\$2,925.00
6/4/2020	Steve E Dietrich	Work on outline for Ranneberg and review opposition's expert report.	2.5	\$650.00	\$1,625.00
6/5/2020	Steve E Dietrich	Attended Ranneberg deposition.	3.5	\$650.00	\$2,275.00
6/15/2020	Steve E Dietrich	Attention to recent team emails and discuss with Walter.	0.8	\$650.00	\$520.00
6/23/2020	Steve E Dietrich	Review recent expert witness supplements and discuss case status recent team communications with Walter.	0.8	\$650.00	\$520.00
7/22/2020	Steve E Dietrich	Review draft cert motion and share comments with Walter/group.	1	\$650.00	\$650.00
7/24/2020	Steve E Dietrich	Attention to firm affidavit for class cert.	0.5	\$650.00	\$325.00
8/5/2020	Steve E Dietrich	Review and comment on draft response to stay motion and share with Walter.	1	\$650.00	\$650.00
8/27/2020	Steve E Dietrich	Review PillPack's opposition to class cert and supporting documents and discuss with Walter for sharing with team.	3	\$650.00	\$1,950.00
12/15/2020	Steve E Dietrich	Review recordings from bad transfer file.	3.5	\$650.00	\$2,275.00
12/16/2020	Steve E Dietrich	Review call recording from bad transfer list.	5	\$650.00	\$3,250.00
1/8/2021	Steve E Dietrich	Review minute order regarding sj and supplemental briefing.	1	\$650.00	\$650.00
1/15/2021	Steve E Dietrich	Review minute order regarding class cert and team phone call.	1	\$650.00	\$650.00
<b>Statement Professional: Steve E Dietrich</b>			<b>76.2</b>		<b>\$49,530.00</b>
4/6/2019	Walter Smith	Prepare draft complaint; e-mail with co counsel re JPA draft; texts with client re: details for complaint; web-based research re: related cases, facts and save to file.	2.7	\$500.00	\$1,350.00
4/8/2019	Walter Smith	E-mail to co counsel with complaint attached.	0.1	\$500.00	\$50.00
4/9/2019	Walter Smith	E-mails with B Terrell and co. re: this case, review draft edits to complaint and e-mail bk re: call tonight.	0.2	\$500.00	\$100.00
4/9/2019	Walter Smith	TC with B Terrell re: getting this complaint ready for filing.	0.1	\$500.00	\$50.00
4/10/2019	Walter Smith	TC with client re [REDACTED].	0.3	\$500.00	\$150.00
4/10/2019	Walter Smith	Edits to draft complaint from B Terrell, legal and factual research, and e-mails re same.	0.9	\$500.00	\$450.00
4/10/2019	Walter Smith	E-mails with co counsel re: [REDACTED]; e-mail to client [REDACTED]. Also follow up call with client re [REDACTED].	0.3	\$500.00	\$150.00
4/10/2019	Walter Smith	E-mail from client [REDACTED] and e-mail re: [REDACTED]; SMSes and e-mails with client confirming [REDACTED].	0.4	\$500.00	\$200.00
4/10/2019	Walter Smith	E-mails with co counsel re [REDACTED].	0.2	\$500.00	\$100.00
4/12/2019	Walter Smith	E-mails with co counsel re this case and TC discussion re same; approve final draft and e-mails with co counsel; e-mail with dkt notification and save S&C, cover sheet to file; e-mail to client attach copies for review.	0.4	\$500.00	\$200.00
4/17/2019	Walter Smith	Update calendar for self, SED to reflect initial disclosure deadlines and related matters; e-mails with co-counsel re: service of process.	0.4	\$500.00	\$200.00
4/23/2019	Walter Smith	Review court notifications re: judge added; summons issued; save to file.	0.2	\$500.00	\$100.00



Date	Timekeeper	Narrative	Units	Rate	Value
4/23/2019	Walter Smith	Review court notifications re: standing orders entered in docket and save to file.	0.3	\$500.00	\$150.00
4/23/2019	Walter Smith	Review court notification re: new docket filing of proof of service on Def (S&C); save to file and calendar d/l for Answer.	0.2	\$500.00	\$100.00
5/7/2019	Walter Smith	E-mails with co-counsel re: notice of appearance by DWT, amendment.	0.2	\$500.00	\$100.00
5/7/2019	Walter Smith	Legal research re: [REDACTED]	0.3	\$500.00	\$150.00
5/7/2019	Walter Smith	E-mails with co-counsel re: [REDACTED]	0.2	\$500.00	\$100.00
5/8/2019	Walter Smith	Research re: [REDACTED]	0.4	\$500.00	\$200.00
5/8/2019	Walter Smith	E-notification from court re: 1st Amd Compl filed; save to file and review same.	0.3	\$500.00	\$150.00
5/10/2019	Walter Smith	E-mail to client [REDACTED]	0.1	\$500.00	\$50.00
5/13/2019	Walter Smith	E-mail from client [REDACTED].	0.1	\$500.00	\$50.00
5/22/2019	Walter Smith	Receive e-notices for filing of Answer, Corp Discl Stmt of Def; review and analyze Answer and save files to case file; review Fed. R. Civ. P. 26 and case schedule and e-mails with B Terrell re: discovery, etc.	0.8	\$500.00	\$400.00
5/30/2019	Walter Smith	E-mail from counsel attaching copy of PillPack-Performance Media Strategies agreement; review same, save notes and save copy of document to file.	0.4	\$500.00	\$200.00
5/30/2019	Walter Smith	Call with co-counsel and O/C re: discovery, settlement discussions, and document exchanges. Initial introductions. Research re: [REDACTED]	0.3	\$500.00	\$150.00
5/30/2019	Walter Smith	[REDACTED]; save relevant materials to file; confer with SED; prepare draft e-mail to counsel re: same.	1.3	\$500.00	\$650.00
5/31/2019	Walter Smith	Discussion with SED re: theories of liability, agency issues and ratification, TCPA case law, facts of this case and discovery plan.	1.3	\$500.00	\$650.00
5/31/2019	Walter Smith	Perform factual and legal research; prepare draft memorandum of law re: relevant facts, law, and discovery topics to explore in this case.	2.6	\$500.00	\$1,300.00
6/3/2019	Walter Smith	Continue research, work on draft legal research memorandum re: discovery issues in this case.	1.7	\$500.00	\$850.00
6/4/2019	Walter Smith	Finalize legal research memorandum on discovery topics; e-mail to counsel and discussion with SED re: same.	2.4	\$500.00	\$1,200.00
6/5/2019	Walter Smith	Participate and take notes during Rule 26(f) conference.	0.5	\$500.00	\$250.00
6/5/2019	Walter Smith	Review and analyze briefing in recent TCPA case; research and save relevant cases re: [REDACTED] Conf.	4.2	\$500.00	\$2,100.00
6/5/2019	Walter Smith	with SED re: research and e-mail with co-counsel re: same.			
6/6/2019	Walter Smith	Online research to [REDACTED]	0.6	\$500.00	\$300.00
6/6/2019	Walter Smith	Research [REDACTED];			
6/6/2019	Walter Smith	save copies of responsive documents to file.	0.5	\$500.00	\$250.00
6/6/2019	Walter Smith	Continued legal research into vicarious liability and analyzed issues with SED re: same.	1.2	\$500.00	\$600.00
6/6/2019	Walter Smith	Meet and discussion with SED; analyzed vicarious liability issues to assist in creating discovery plan.	0.5	\$500.00	\$250.00
6/10/2019	Walter Smith	E-mails with co-counsel re: [REDACTED]	0.3	\$500.00	\$150.00
6/10/2019	Walter Smith	Perform web-based search for [REDACTED]	0.5	\$500.00	\$250.00
6/10/2019	Walter Smith	Review draft discovery requests from co-counsel; edits to same and e-mail back with same attached.	1.8	\$500.00	\$900.00
6/11/2019	Walter Smith	E-mails with co-counsel re: draft discovery, review same and suggest final edits.	0.3	\$500.00	\$150.00
6/11/2019	Walter Smith	Perform legal research; review and analyze [REDACTED]	1.9	\$500.00	\$950.00
6/11/2019	Walter Smith	E-mail from co-counsel attaching discovery requests; save to file and add response deadline to calendar.	0.1	\$500.00	\$50.00
6/12/2019	Walter Smith	E-mails with co-counsel re: JSR timeline and unavailability until June 21.	0.1	\$500.00	\$50.00
6/18/2019	Walter Smith	Review e-mails including [REDACTED] e.	0.2	\$500.00	\$100.00
6/21/2019	Walter Smith	E-mails with co-counsel re: [REDACTED]	0.2	\$500.00	\$100.00

Date	Timekeeper	Narrative	Units	Rate	Value
6/21/2019	Walter Smith	Email to potential witness.	0.1	\$500.00	\$50.00
6/21/2019	Walter Smith	Exchanged multiple emails with potential witness.	0.2	\$500.00	\$100.00
6/21/2019	Walter Smith	E-mails with co-counsel re: discovery issues. Research [REDACTED]	0.1	\$500.00	\$50.00
6/21/2019	Walter Smith	[REDACTED]	1.3	\$500.00	\$650.00
6/27/2019	Walter Smith	E-mails with witness re: possible telephone call timing.	0.1	\$500.00	\$50.00
7/1/2019	Walter Smith	E-mails from co-counsel, O/C re: outstanding discovery responses from PillPack. E-mails with co-counsel re: Rule 26(f) conference wind-up; review case deadlines and TC to co-counsel re: initial disclosures due today.	0.2	\$500.00	\$100.00
7/8/2019	Walter Smith	Prepare draft initial disclosures, e-mails with co-counsel re: same and attach documents to bates stamp and include with production of same.	0.3	\$500.00	\$150.00
7/8/2019	Walter Smith	E-mails with co-counsel re: strategy going into 26(f) conference tomorrow; discuss bifurcation, case management issues with SED and with co-counsel; e-mails from co-counsel attaching drafts of discovery documents for consideration by opposing counsel and review same.	0.5	\$500.00	\$250.00
7/9/2019	Walter Smith	With co-counsel re: upcoming discovery conference; preparation for conference including brief review of e-mail from co-counsel.	0.6	\$500.00	\$300.00
7/10/2019	Walter Smith	Complete FRCP 26(f) conference with opposing counsel; e-mails with co-counsel re: same.	0.2	\$500.00	\$100.00
7/10/2019	Walter Smith	Complete FRCP 26(f) conference with opposing counsel; e-mails with co-counsel re: same.	1	\$500.00	\$500.00
7/12/2019	Walter Smith	TC with client re: [REDACTED]	0.5	\$500.00	\$250.00
7/15/2019	Walter Smith	TC with client re: [REDACTED]	0.3	\$500.00	\$150.00
7/19/2019	Walter Smith	Review and analyze discovery responses of defendants; review and analyze notes on Rule 26(f) conference and surrounding communications; conf. with SED re: discovery issues and e-mail to co-counsel re: same.	1.8	\$500.00	\$900.00
7/21/2019	Walter Smith	Read, review, and e-mails with SED re: [REDACTED]	0.4	\$500.00	\$200.00
7/22/2019	Walter Smith	TC with co-counsel re: subpoenas, other discovery concerns in this case. Prepare draft subpoenas to third parties; review and analyze court opinions, form subpoenas, and e-mails from co-counsel with suggestions for same.	0.5	\$500.00	\$250.00
7/22/2019	Walter Smith	Review and analyze discovery responses; perform legal research; prepare draft letter to counsel re: deficiencies in discovery responses; e-mails to SED/Jen Murray re: same.	1.9	\$500.00	\$950.00
7/23/2019	Walter Smith	E-mails with co counsel and perform legal research, review case opinions and letter forms and updates to draft discovery conference request ltr to O/C.	3.4	\$500.00	\$1,700.00
7/24/2019	Walter Smith	E-mails with co counsel and edits to draft subpoenas to third party marketing partners of defendant; review and analyze case file to ID additional matters to include in requests.	2.7	\$500.00	\$1,350.00
7/24/2019	Walter Smith	Continue with legal research after draft from co-counsel for discovery letter; updates to draft letter and e-mail back to co counsel.	1.6	\$500.00	\$800.00
7/24/2019	Walter Smith	Continue legal research to obtain additional authority on discovery rulings to cite in Rule 26 conference request ltr; e-mail to co counsel attach updated draft.	2.1	\$500.00	\$1,050.00
7/26/2019	Walter Smith	E-mails with co counsel re discovery letter.	1.9	\$500.00	\$950.00
7/29/2019	Walter Smith	E-mail to co counsel re discovery letter.	0.1	\$500.00	\$50.00
8/2/2019	Walter Smith	E-mails with co-counsel, review draft discovery letter and set up time for discovery conference.	0.1	\$500.00	\$50.00
8/7/2019	Walter Smith	Review local rules, prepare file and serve change of address form and e-mails with co-counsel re: same.	0.5	\$500.00	\$250.00
8/8/2019	Walter Smith	E-mails with co-counsel re: meet and confer; schedule same for next Thursday and note on calendar.	0.3	\$500.00	\$150.00
8/8/2019	Walter Smith	E-mail from OC and review draft subpoenas; e-mails with co-counsel re: same and share suggested edits to same; review subpoenas once served.	0.3	\$500.00	\$150.00
8/8/2019	Walter Smith	E-mails with opposing counsel, co-counsel re: rescheduling of tomorrow's discovery conference.	0.5	\$500.00	\$250.00
8/14/2019	Walter Smith	E-mails with co-counsel and edits to draft of motion for protective order, ESI stip.	0.2	\$500.00	\$100.00
8/15/2019	Walter Smith	Discuss case progress, answer questions.	0.3	\$500.00	\$150.00
8/23/2019	Walter Smith	Discovery conference with opposing counsel.	0.2	\$500.00	\$100.00
8/23/2019	Walter Smith	Discovery conference with opposing counsel.	1	\$500.00	\$500.00

Date	Timekeeper	Narrative	Units	Rate	Value
8/23/2019	Walter Smith	E-mails with co-counsel re: scheduling of the discovery conference today; re: follow-up to same; prepare and send draft message to counsel memorializing our discussion during the discovery conference and action items for the near future.	1.1	\$500.00	\$550.00
8/26/2019	Walter Smith	E-mail to J Murray re: follow up to discovery conference (message memorializing our discussion).	0.1	\$500.00	\$50.00
8/26/2019	Walter Smith	E-mail from Prospects DM counsel re: extension of time; with J Murray re: same.	0.1	\$500.00	\$50.00
8/26/2019	Walter Smith	E-mail from PillPack's counsel attaching letter about subpoena objections.	0.1	\$500.00	\$50.00
8/29/2019	Walter Smith	Review and take notes, highlight subpoena production from Performance Media Strategies with e-mails to Jen and Steve re: same.	2.2	\$500.00	\$1,100.00
8/29/2019	Walter Smith	With co-counsel re: possible addition of Anthony Paronich as additional co-counsel in this case.	0.6	\$500.00	\$300.00
8/30/2019	Walter Smith	E-mails with SED re: contents of Mark Dorf / Performance Media Strategies subpoena production.	0.2	\$500.00	\$100.00
8/30/2019	Walter Smith	E-mail from O/C re: search terms for discovery production and review same; e-mails with J Murray re: setting up a call for Tuesday to talk about this case and action plan.	0.2	\$500.00	\$100.00
9/3/2019	Walter Smith	With J Murray re: outstanding discovery matters; plan to deal with discovery dispute (as discussed at recent call with O/C), obtaining supplemental information from subpoena to PMSI, points about subpoena DT production; search terms for PillPack discovery; and objections to subpoenas and plan to draft subpoena to Byte Success.	0.6	\$500.00	\$300.00
9/4/2019	Walter Smith	Review authority re: Fed. R. Civ. P. 45 and PillPack's "objections" in their letter; confer with SED re: same.	0.6	\$500.00	\$300.00
9/4/2019	Walter Smith	Review notes from our call yesterday re: outstanding discovery to-do list; e-mail to co-counsel J Murray re: same and discovery to do list; response message from Jennifer re: same.	0.3	\$500.00	\$150.00
9/4/2019	Walter Smith	Prepare draft subpoena (Exhibit A) to Byte Success Marketing; research to verify address; e-mail to Jennifer Murray re: same.	0.4	\$500.00	\$200.00
9/5/2019	Walter Smith	E-mail from co-counsel re: JPA update; discuss briefly with SED, review, sign, scan, save, and e-mail around my signed version.	0.2	\$500.00	\$100.00
9/5/2019	Walter Smith	Additional edits to subpoena to Byte Success and send around updated draft to co-counsel.	0.1	\$500.00	\$50.00
9/6/2019	Walter Smith	Review documents produced under Prospects DM subpoena; compare original call records and recording; update my case notes and e-mail to co-counsel.	0.9	\$500.00	\$450.00
9/6/2019	Walter Smith	E-mails with co-counsel re: discovery task list; Prospects' subpoena response; meet and confer discussion with PillPack; objections and apparent joint defense agreement by PillPack/Prospects/Performance Media.	0.3	\$500.00	\$150.00
9/6/2019	Walter Smith	E-mail from co-counsel proposing draft stipulation to change class cert deadline; review and edits to same and e-mail back; e-mails from co-counsel re: same.	0.2	\$500.00	\$100.00
9/7/2019	Walter Smith	E-mails from co-counsel re: proposed meet and confer messages, follow-up to recent subpoena productions.	0.2	\$500.00	\$100.00
9/9/2019	Walter Smith	Review list of proposed search terms from A Paronich; review PillPack's proposed terms and subpoena production from Prospects DM; add additional proposed terms and send by e-mail to co-counsel.	0.3	\$500.00	\$150.00
9/9/2019	Walter Smith	Review draft subpoena for Tyler Hunt and e-mail to co-counsel re: proposed edits to same.	0.2	\$500.00	\$100.00
9/9/2019	Walter Smith	Review memo to file from co-counsel Anthony P; save to file and compare my own notes.	0.2	\$500.00	\$100.00
9/9/2019	Walter Smith	E-mail to client attaching updated JPA current as of 9/5.	0.1	\$500.00	\$50.00
9/9/2019	Walter Smith	Update time records.	0.3	\$500.00	\$150.00
9/12/2019	Walter Smith	E-mails from co-counsel re: discovery/subpoena responses; with co-counsel re: meet and confer about same with Prospects DM.	0.3	\$500.00	\$150.00
9/12/2019	Walter Smith	Review and analyze supplemental production from PMSI and e-mail to co-counsel re: same, noting matters for f/u.	0.7	\$500.00	\$350.00
9/13/2019	Walter Smith	E-mails with co-counsel re: meet and confer today, review notes and correspondence and prep outline for discovery conference.	0.5	\$500.00	\$250.00
9/13/2019	Walter Smith	Discovery conference with Defendant.	0.5	\$500.00	\$250.00
9/13/2019	Walter Smith	With J Murray re: strategy for discovery going forward.	0.3	\$500.00	\$150.00
9/13/2019	Walter Smith	E-mail to co-counsel proposing f/u message to OC about our discovery conference today; incorporate changes and e-mail to OC re: same.	0.4	\$500.00	\$200.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/17/2019	Walter Smith	E-mails from client re: [REDACTED] and to co-counsel re: same; e-mails from co-counsel re: subpoena to Cricket; e-mails with co-counsel re: service on Byte Success (subpoena DT) and research to [REDACTED], save data to case file and suggest alternate address.	0.3	\$500.00	\$150.00
9/18/2019	Walter Smith	E-mail from co-counsel re: subpoena consent form for client; respond to same; e-mail to client re: consent form and requesting signature.	0.1	\$500.00	\$50.00
9/18/2019	Walter Smith	With AP, JM re: serving Byte Success with subpoena; research re: NC SOS substitute service statute and send around citation to same as a fall back.	0.2	\$500.00	\$100.00
9/18/2019	Walter Smith	E-mails from OC re: service of discovery production; retrieve from secure server, save to file, unpack and decrypt.	0.2	\$500.00	\$100.00
9/18/2019	Walter Smith	E-mail from OC re: discovery conference.	0.1	\$500.00	\$50.00
9/19/2019	Walter Smith	Client e-mail re: will sign subpoena consent form.	0.1	\$500.00	\$50.00
9/19/2019	Walter Smith	E-mails with co-counsel re: progress on getting Prospects to produce calling records.	0.1	\$500.00	\$50.00
9/20/2019	Walter Smith	Co-counsel e-mails re: discovery production from PillPack; re: proposed joint motion to extend briefing deadlines; review and comment on same and send to co-counsel.	0.2	\$500.00	\$100.00
9/20/2019	Walter Smith	E-mail from co-counsel re: documents produced in response to subpoena; review and analyze same and prepare notes to file; e-mail to co-counsel re: same and fwd to SED.	2.6	\$500.00	\$1,300.00
9/20/2019	Walter Smith	E-mail to co counsel re ongoing Rule 26 back and forth with PillPack.	0.3	\$500.00	\$150.00
9/23/2019	Walter Smith	Email from co-counsel J Murray re: case schedule and work on draft stipulation.	0.2	\$500.00	\$100.00
9/23/2019	Walter Smith	Discuss outreach to potential witness.	0.1	\$500.00	\$50.00
9/23/2019	Walter Smith	E-mail from co-counsel and analyze and conduct legal research re: summary judgment opposition; discovery topics. Complete review and analysis of relevant legal authority for meet and confer message / SJ opp preparation and prep notes on same.	2.2	\$500.00	\$1,100.00
9/24/2019	Walter Smith	Draft meet and confer email to OC and send around for input by co-counsel. Include proposed special rogs on revenues, etc.	0.7	\$500.00	\$350.00
9/24/2019	Walter Smith	E-mails with co-counsel re: [REDACTED] re: meet and confer draft msg to OC.	1.2	\$500.00	\$600.00
9/24/2019	Walter Smith		0.3	\$500.00	\$150.00
9/26/2019	Walter Smith	Review discovery production from defendant and prep notes and questions; e-mail around my notes and reactions.	2.8	\$500.00	\$1,400.00
9/27/2019	Walter Smith	Discuss document review; discovery plan; litigation deadlines.	0.4	\$500.00	\$200.00
9/27/2019	Walter Smith	Strategized re: summary judgment opposition.	0.6	\$500.00	\$300.00
9/27/2019	Walter Smith	E-mail to co-counsel f/uing about various case management tasks.	0.1	\$500.00	\$50.00
9/27/2019	Walter Smith	E-mails with co-counsel re: case strategy on discovery disputes; e-mails with OC; confirming case details; class cert deadlines; additional regulatory issue subpoenas.	0.7	\$500.00	\$350.00
10/2/2019	Walter Smith	Save and forward client's consent for subpoena to Cricket Wireless.	0.2	\$500.00	\$100.00
10/2/2019	Walter Smith	E-mails with co counsel re: information from Prospects DM via subpoena, discovery matters. With SED and review information about data from Prospects DM. Discuss ongoing discovery productions and case strategy, timeline re: SJM and class cert mtn deadlines.	0.2	\$500.00	\$100.00
10/2/2019	Walter Smith		0.6	\$500.00	\$300.00
10/3/2019	Walter Smith	E-mails with J Murray re: [REDACTED]	0.1	\$500.00	\$50.00
10/3/2019	Walter Smith	Review and analyze latest PP RFP production; save notes to file and e-mail around to co counsel.	2.2	\$500.00	\$1,100.00
10/3/2019	Walter Smith	Review and edits to outline for SJM opposition; e-mail around to co counsel.	1.4	\$500.00	\$700.00
10/3/2019	Walter Smith	E-mails to co-counsel re: document production from defendant.	0.2	\$500.00	\$100.00
10/4/2019	Walter Smith	Review 30b6 Dep Notice from co-counsel; e-mails confirming let's serve it and the other individual dep notices attached by J Murray.	0.2	\$500.00	\$100.00
10/4/2019	Walter Smith	Review and analyze PP latest RFP production; meeting with SED re: same; prepare written summary of data and e-mail to co counsel, suggesting [REDACTED]	1.3	\$500.00	\$650.00
10/4/2019	Walter Smith	E-mails re: plan to prep depo notices, re: progress on subpoena production from Prospects DM.	0.3	\$500.00	\$150.00
10/5/2019	Walter Smith	E-mails from co-counsel re: [REDACTED]	0.1	\$500.00	\$50.00

Date	Timekeeper	Narrative	Units	Rate	Value
10/7/2019	Walter Smith	Review and analyze call data production from Prospects DM (4M calls or so) with SED and in my own analysis; prepare written analysis of same save to file and e-mail around to co-counsel with notes for f/u.	1.7	\$500.00	\$850.00
10/18/2019	Walter Smith	E-mails from O/C re: depo scheduling, service of additional doc production and save same to file and organize.	0.2	\$500.00	\$100.00
10/18/2019	Walter Smith	Review and analyze case documents and prepare notes on same.	2.4	\$500.00	\$1,200.00
10/20/2019	Walter Smith	Complete review and analysis of fourth batch of PillPack discovery production and update case notes; e-mail to co-counsel re: same.	2.3	\$500.00	\$1,150.00
10/24/2019	Walter Smith	E-mails with co counsel re: subpoena production process and outstanding to do list for subpoenas; review notes and identify information per A Paronich question.	0.4	\$500.00	\$200.00
10/28/2019	Walter Smith	E-mail from co-counsel J Murray re: subpoena served on Byte Success.	0.1	\$500.00	\$50.00
10/29/2019	Walter Smith	Review latest PillPack production; save notes to file.	0.4	\$500.00	\$200.00
10/29/2019	Walter Smith	Review latest PillPack discovery production; save notes to file.	2.8	\$500.00	\$1,400.00
10/31/2019	Walter Smith	E-mail to co counsel attach latest batch of PillPack discovery review notes.	0.1	\$500.00	\$50.00
11/1/2019	Walter Smith	E-mails with co-counsel re: discovery production; deposition schedule.	0.2	\$500.00	\$100.00
11/5/2019	Walter Smith	Co-counsel emails re: scheduling depositions.	0.2	\$500.00	\$100.00
11/6/2019	Walter Smith	Co-counsel emails re: discovery matters.	0.2	\$500.00	\$100.00
11/11/2019	Walter Smith	Re: Byte Success counsel, discovery priorities.	0.1	\$500.00	\$50.00
11/13/2019	Walter Smith	Review subpoena to Byte Success and identify [REDACTED]; e-mail to co-counsel re: same.	0.6	\$500.00	\$300.00
11/13/2019	Walter Smith	Exchanged emails with co-counsel regarding discussions with Mark Dorf.	0.1	\$500.00	\$50.00
11/13/2019	Walter Smith	Prepare draft [REDACTED]. Review and analyze Dorf subpoena production.	2.1	\$500.00	\$1,050.00
11/14/2019	Walter Smith	Continued to review draft Dorf declaration .	0.1	\$500.00	\$50.00
11/15/2019	Walter Smith	Continued to review draft Dorf declaration.	0.1	\$500.00	\$50.00
11/25/2019	Walter Smith	Msg to co counsel re: Dorf decl.	0.1	\$500.00	\$50.00
11/26/2019	Walter Smith	Continued to work on managing subpoena responses.	0.2	\$500.00	\$100.00
12/4/2019	Walter Smith	Review correspondence with opposing counsel re discovery process and case schedule. E-mail to co counsel re: same and proposing depo dates vs. f/u about written discovery responses.	0.3	\$500.00	\$150.00
12/6/2019	Walter Smith	Continued to analyze issues regarding Performance Media subpoena response.	0.3	\$500.00	\$150.00
12/16/2019	Walter Smith	Review Byte Success subpoena recordings; prepare notes on same.	1.5	\$500.00	\$750.00
1/6/2020	Walter Smith	Complete review of Byte Success subpoena call recordings; prep notes and save to file with email to co counsel.	4.2	\$500.00	\$2,100.00
1/13/2020	Walter Smith	E-mails with co counsel re subpoena to Little Brook Media, edits to same and send around.	0.6	\$500.00	\$300.00
1/14/2020	Walter Smith	E-mails with co-counsel re: various case matters.	0.4	\$500.00	\$200.00
1/14/2020	Walter Smith	With co counsel re: plan for completing discovery, etc.	0.9	\$500.00	\$450.00
1/15/2020	Walter Smith	E-mails with co counsel and OC re depositions Fri.	0.1	\$500.00	\$50.00
1/15/2020	Walter Smith	Emails re service of LBM subpoena, Fri discovery conf.	0.1	\$500.00	\$50.00
1/16/2020	Walter Smith	Emails re discovery conf tomorrow.	0.1	\$500.00	\$50.00
1/17/2020	Walter Smith	Discovery conference with OC re: various issues.	0.3	\$500.00	\$150.00
1/17/2020	Walter Smith	E-mails with co counsel, prepare for and debrief from discovery conference. Review and updates/planning on status of discovery, next steps.	0.4	\$500.00	\$200.00
1/22/2020	Walter Smith	Met and conferred with Josh Grant about subpoena response and exchanged emails with group regarding same.	1.5	\$500.00	\$750.00
1/23/2020	Walter Smith	E-mails with OC re: deposition dates, with co counsel re same.	0.1	\$500.00	\$50.00
1/24/2020	Walter Smith	Review and analyze Little Brook Media document production today.	0.8	\$500.00	\$400.00
1/24/2020	Walter Smith	E-mails with co counsel re LBM subpoena docs.	0.3	\$500.00	\$150.00
1/27/2020	Walter Smith	Review past discovery responses, note outstanding redaction issues for today's call with OC.	0.3	\$500.00	\$150.00
1/27/2020	Walter Smith	E-mails with co counsel re: today's discovery conference, draft subpoena.	0.3	\$500.00	\$150.00
1/27/2020	Walter Smith	Analyzed issues re: Prospects DM's draft declaration.	0.3	\$500.00	\$150.00

Date	Timekeeper	Narrative	Units	Rate	Value
1/27/2020	Walter Smith	Discovery conference with OC.	0.1	\$500.00	\$50.00
1/29/2020	Walter Smith	E-mails with co counsel re: declarations, subpoena doc production in this case.	0.2	\$500.00	\$100.00
1/29/2020	Walter Smith	Prep draft subpoena to Sharecare, analyzed Landfall's subpoena response.	0.3	\$500.00	\$150.00
1/29/2020	Walter Smith	E-mails with A Paronich re: subpoenas to Yodel, Sharecare, and Landfall subpoena response.	0.1	\$500.00	\$50.00
1/30/2020	Walter Smith	A Paronich email re case management	0.1	\$500.00	\$50.00
1/31/2020	Walter Smith	J Murray response email re case management	0.1	\$500.00	\$50.00
1/31/2020	Walter Smith	Supplemental discovery responses served by defendant, save to file.	0.1	\$500.00	\$50.00
2/3/2020	Walter Smith	Re service of subpoenas on Yodel, Sharecare.	0.2	\$500.00	\$100.00
2/4/2020	Walter Smith	Review and analyze supplemental discovery responses of defendant.	0.2	\$500.00	\$100.00
2/4/2020	Walter Smith	Calendar deadlines for class cert motion.	0.2	\$500.00	\$100.00
2/4/2020	Walter Smith	Legal research, begin outline to organize thoughts about outstanding work to do in coming months.	1.3	\$500.00	\$650.00
2/4/2020	Walter Smith	Email to co counsel re outstanding discovery issues and game plan for class cert, expert disclosure.	0.2	\$500.00	\$100.00
2/5/2020	Walter Smith	E-mails with OC, co counsel re: discovery questions.	0.5	\$500.00	\$250.00
2/5/2020	Walter Smith	Receive latest batch of documents from OC; save to file and review same, prep notes.	0.8	\$500.00	\$400.00
2/7/2020	Walter Smith	E-mails with co counsel, OC re: depo dates, etc.	0.5	\$500.00	\$250.00
2/10/2020	Walter Smith	E-mails from co counsel re: deposition scheduling.	0.1	\$500.00	\$50.00
2/11/2020	Walter Smith	E-mails with co counsel about declaration from C Anderson / Byte Success; deposition schedule.	0.4	\$500.00	\$200.00
2/12/2020	Walter Smith	E-mails about depositions in Utah including message from OC re: same.	0.1	\$500.00	\$50.00
2/14/2020	Walter Smith	Attention to attorney billing records, update case data.	0.6	\$500.00	\$300.00
2/14/2020	Walter Smith	E-mail to co counsel regarding case management.	0.1	\$500.00	\$50.00
2/18/2020	Walter Smith	E-mails from co counsel about expert proposal; review draft agreement.	0.2	\$500.00	\$100.00
2/19/2020	Walter Smith	E-mails with co counsel about response date for ShareCare subpoena; depo notices for Utah.	0.1	\$500.00	\$50.00
2/20/2020	Walter Smith	E-mails with co counsel, review numbers about class size.	0.1	\$500.00	\$50.00
2/21/2020	Walter Smith	E-mails from co counsel re: fees; discovery. Review Yodel subpoena response.	0.3	\$500.00	\$150.00
2/24/2020	Walter Smith	E-mails with co-counsel re: discovery conference / messages with Def. re: redacted phone numbers. Review past correspondence and point out previous meet and confer on this topic 1/27.	0.2	\$500.00	\$100.00
2/24/2020	Walter Smith	E-mail from OC with latest discovery batch of docs attached; download and attempts to open same; e-mails with OC and SED re: same.	0.3	\$500.00	\$150.00
2/25/2020	Walter Smith	Review and analyze latest document production from PillPack. Save notes to file.	3.1	\$500.00	\$1,550.00
2/25/2020	Walter Smith	E-mail to co-counsel about today's discovery review; discovery questions we may want to address before Thursday.	0.1	\$500.00	\$50.00
2/25/2020	Walter Smith	E-mails with co-counsel, OC re: getting latest discovery documents to open.	0.1	\$500.00	\$50.00
2/26/2020	Walter Smith	E-mails re: discovery conference scheduling, draft 30b6 notice.	0.3	\$500.00	\$150.00
2/26/2020	Walter Smith	E-mails with co counsel about Grant declaration.	0.5	\$500.00	\$250.00
2/26/2020	Walter Smith	Review draft updated decl for J Grant and comments to same.	0.3	\$500.00	\$150.00
2/27/2020	Walter Smith	E-mails with co counsel re: Josh Grant draft dec. Review drafts of same and propose edits/comments for discussion.	0.5	\$500.00	\$250.00
2/27/2020	Walter Smith	E-mails with co counsel about Prospects DM subpoena response.	0.3	\$500.00	\$150.00
2/27/2020	Walter Smith	Reviewed Prospects DM production and analyzed issues regarding same.	0.5	\$500.00	\$250.00
2/27/2020	Walter Smith	TC with OC about discovery conference topics. TC afterwards with J Murray re: debriefing on our discovery conference, opt in consent questions.	0.8	\$500.00	\$400.00
2/27/2020	Walter Smith	Email from co counsel attaching updated 30b6 notice. Review same.	0.3	\$500.00	\$150.00
2/27/2020	Walter Smith	Co-counsel e-mail re: third party subpoena discovery.	0.1	\$500.00	\$50.00
2/28/2020	Walter Smith	E-mails with co counsel about subpoena responses.	0.3	\$500.00	\$150.00
2/28/2020	Walter Smith	E-mail from OC about latest discovery production. Save to file.	0.1	\$500.00	\$50.00
2/28/2020	Walter Smith	Review and analyze Prospects DM subpoena production .	0.2	\$500.00	\$100.00
3/2/2020	Walter Smith	Review and analyze court opinions sent by SED.	0.3	\$500.00	\$150.00
3/3/2020	Walter Smith	E-mails with co counsel about changes to depo schedule; 3d party discovery issues.	0.1	\$500.00	\$50.00
3/3/2020	Walter Smith	Op Co email and review ltr on 30b6 objns.	0.2	\$500.00	\$100.00

Date	Timekeeper	Narrative	Units	Rate	Value
3/3/2020	Walter Smith	Review latest discovery production, save to file and prep notes on same.	1.8	\$500.00	\$900.00
3/4/2020	Walter Smith	Review discovery production from PillPack; prepare notes re: same; discuss with SED and email to co counsel re same.	2.2	\$500.00	\$1,100.00
3/5/2020	Walter Smith	E-mails with co-counsel re: expert witness matters; subpoena responses; draft documents in this case.	0.3	\$500.00	\$150.00
3/5/2020	Walter Smith	Review draft stip on [REDACTED].	0.1	\$500.00	\$50.00
3/5/2020	Walter Smith	Review subpoena questions, response from ShareCare.	0.2	\$500.00	\$100.00
3/6/2020	Walter Smith	E-mails with co counsel re: subpoena responses.	0.3	\$500.00	\$150.00
3/6/2020	Walter Smith	Review and analyze discovery production from PillPack; cross reference ShareCare subpoena responses.	0.5	\$500.00	\$250.00
3/10/2020	Walter Smith	Co counsel, OC emails about discovery.	0.2	\$500.00	\$100.00
3/10/2020	Walter Smith	Review draft stip marked up by PillPack. Outline ideas for response to same.	0.2	\$500.00	\$100.00
3/12/2020	Walter Smith	Reviewed draft Grant Declaration.	0.2	\$500.00	\$100.00
3/12/2020	Walter Smith	Confer with SED re: subpoena responses we have received to date; status of Prospects and Yodel subpoena productions.	0.2	\$500.00	\$100.00
3/12/2020	Walter Smith	E-mails with co counsel about subpoena productions.	0.2	\$500.00	\$100.00
3/12/2020	Walter Smith	Review complaint to confirm timeline of events w/r/t call recordings and dates of contact to our client.	0.1	\$500.00	\$50.00
3/13/2020	Walter Smith	Review and analyze calling records provided by defendant today in unredacted form.	0.8	\$500.00	\$400.00
3/13/2020	Walter Smith	Review subpoena responses, draft decl of Josh G and write up notes and conclusions about same.	1.3	\$500.00	\$650.00
3/17/2020	Walter Smith	E-mails with co counsel re: subpoena production, affidavits in process.	0.3	\$500.00	\$150.00
3/17/2020	Walter Smith	Conference with SED re: progress in discovery in this case; next steps.	0.3	\$500.00	\$150.00
3/18/2020	Walter Smith	E-mails with co counsel about discovery matters; analysis of materials obtained in discovery.	0.3	\$500.00	\$150.00
3/18/2020	Walter Smith	Review and analyze discovery production to identify possibly responsive materials.	0.3	\$500.00	\$150.00
3/20/2020	Walter Smith	Review and analyze objections to 30b6 notice by PillPack; review and analyze past records on meet and confers, supplemental responses by PillPack.	1.9	\$500.00	\$950.00
3/20/2020	Walter Smith	E-mail to co counsel re: response to PillPack's 30b6 objections.	0.2	\$500.00	\$100.00
3/23/2020	Walter Smith	E-mails with co-counsel re: expert report.	0.1	\$500.00	\$50.00
3/23/2020	Walter Smith	Legal research re: discovery dispute, vendors within scope of discovery.	1.3	\$500.00	\$650.00
3/23/2020	Walter Smith	Review factual record re: discovery in this case, past discovery conferences; prepare draft letter to OC re: discovery dispute about vendor information, revenues, etc. in context of Rule 30b6 notice.	2.8	\$500.00	\$1,400.00
3/23/2020	Walter Smith	Discovery requests received from OC; briefly review same and update calendar.	0.2	\$500.00	\$100.00
3/24/2020	Walter Smith	Incorporate SED edits and finalize draft letter re: discovery conference; send to co counsel for review.	0.2	\$500.00	\$100.00
3/24/2020	Walter Smith	E-mails with co counsel about various discovery matters.	0.4	\$500.00	\$200.00
3/25/2020	Walter Smith	Edits to final discovery conference letter; send to OC with CC to co counsel.	0.2	\$500.00	\$100.00
3/26/2020	Walter Smith	Review Def's discovery requests to note topics we need to go over with client. E-mail to client to review.	0.4	\$500.00	\$200.00
3/28/2020	Walter Smith	TC with client and complete discovery responses draft.	2	\$500.00	\$1,000.00
3/28/2020	Walter Smith	E-mail to client about discovery, documents to search for.	0.1	\$500.00	\$50.00
3/30/2020	Walter Smith	E-mails with co counsel, OC re: depo scheduling, discovery conf.	0.2	\$500.00	\$100.00
3/31/2020	Walter Smith	Emails re draft expert reports and review draft of same.	0.3	\$500.00	\$150.00
4/1/2020	Walter Smith	E-mails with co counsel, OC re: discovery conference, expert reports, etc.	0.3	\$500.00	\$150.00
4/1/2020	Walter Smith	Review draft expert reports from co counsel.	0.4	\$500.00	\$200.00
4/2/2020	Walter Smith	Discovery conference with OC re: 30b6 topics.	0.6	\$500.00	\$300.00
4/2/2020	Walter Smith	With J Murray to plan for discovery conference. E-mails re: same with co counsel.	0.1	\$500.00	\$50.00
4/3/2020	Walter Smith	E-mails with co-counsel about declaration of J Grant; review and analyze discovery requests responses and objections of PillPack for same.	0.5	\$500.00	\$250.00
4/6/2020	Walter Smith	E-mails with co-counsel about latest discovery meet and confer f/u message from OC. Review and analyze counsel's letter, cf. my own notes.	0.3	\$500.00	\$150.00
4/6/2020	Walter Smith	Review discovery to OC and responses; e-mail to co counsel re: f/u on PillPack's objections about common interest, joint defense.	0.4	\$500.00	\$200.00
4/10/2020	Walter Smith	Work on draft responses to discovery requests.	1.8	\$500.00	\$900.00
4/10/2020	Walter Smith	E-mails from co-counsel re: discussion with OC about scheduling in person depositions vs video.	0.2	\$500.00	\$100.00

Date	Timekeeper	Narrative	Units	Rate	Value
4/13/2020	Walter Smith	E-mails re: subpoenas served on our experts; re: meet and confer with counsel for ShareCare.	0.1	\$500.00	\$50.00
4/14/2020	Walter Smith	TC with client about completing discovery responses.	0.9	\$500.00	\$450.00
4/14/2020	Walter Smith	E-mails with co counsel about discovery drafts.	0.1	\$500.00	\$50.00
4/14/2020	Walter Smith	E-mails re: discovery conference between J Murray, OC.	0.1	\$500.00	\$50.00
4/14/2020	Walter Smith	Draft discovery responses and objections; review and analyze case file to identify potentially responsive materials.	2.3	\$500.00	\$1,150.00
4/15/2020	Walter Smith	E-mails with co-counsel, client and setup Sharefile platform to exchange discovery documents. Complete review of case file; analysis of discovery requests from Defendant; draft responses to same including comments, notes and questions for discussion; e-mail copy of draft to SED for discussion.	0.3	\$500.00	\$150.00
4/15/2020	Walter Smith	Apply edits to draft discovery responses. E-mail to co-counsel.	2.8	\$500.00	\$1,400.00
4/15/2020	Walter Smith	E-mail from co counsel about discovery motion decision. Email to SED re: same.	0.3	\$500.00	\$150.00
4/15/2020	Walter Smith	E-mail from co counsel about discovery motion decision. Email to SED re: same.	0.1	\$500.00	\$50.00
4/16/2020	Walter Smith	TC with J Murray re discovery.	0.5	\$500.00	\$250.00
4/16/2020	Walter Smith	E-mails with co counsel re: discovery responses/objections; comments on same; ruling from chambers on depo's.	0.3	\$500.00	\$150.00
4/16/2020	Walter Smith	Review comments from J Murray on discovery objns/responses drafts. Conf with SED re same.	0.5	\$500.00	\$250.00
4/17/2020	Walter Smith	Edits to draft discovery requests. Compare objections to expert subpoenas.	1.6	\$500.00	\$800.00
4/17/2020	Walter Smith	Review draft objections to expert subpoenas.	0.3	\$500.00	\$150.00
4/17/2020	Walter Smith	E-mails with co counsel re discovery responses, experts subpoenas, depo scheduling, discovery conf today.	0.4	\$500.00	\$200.00
4/17/2020	Walter Smith	Review draft letter to OC re: plaintiff moving to compel depositions.	0.1	\$500.00	\$50.00
4/18/2020	Walter Smith	E-mail to client re: discovery responses, etc.	0.1	\$500.00	\$50.00
4/19/2020	Walter Smith	Review client response; e-mail to client re: docs for discovery, signing responses. Review draft discovery responses; review e-mail file to ID subpoena productions, etc. already provided to defendant;	0.1	\$500.00	\$50.00
4/20/2020	Walter Smith	apply edits and changes.	0.6	\$500.00	\$300.00
4/20/2020	Walter Smith	TC with J Murray re: this case.	0.2	\$500.00	\$100.00
4/20/2020	Walter Smith	E-mail to co counsel, attach copy of draft discovery responses. E-mails with client re: same.	0.1	\$500.00	\$50.00
4/20/2020	Walter Smith	E-mail co counsel, request ShareFile login for client / discovery.	0.1	\$500.00	\$50.00
4/21/2020	Walter Smith	E-mails with co counsel re discovery responses; review requests for same. Complete discovery responses; review final from J Murray of written objns/responses; review documents for RFP	0.4	\$500.00	\$200.00
4/22/2020	Walter Smith	production and e-mails with co counsel re same.	1.2	\$500.00	\$600.00
4/23/2020	Walter Smith	Emails re scheduling depositions, subpoenas for doc production from expert.	0.2	\$500.00	\$100.00
4/24/2020	Walter Smith	Plaintiff's Objections served re: subpoena to Jeff H; mtn served for expert witness deadlines. Review and save.	0.3	\$500.00	\$150.00
4/27/2020	Walter Smith	OC suggests remote dep terms; review draft stip and e-mails with co counsel re: same.	0.3	\$500.00	\$150.00
4/28/2020	Walter Smith	Stip and order filed re: depositions; e-mails re dep scheduling.	0.2	\$500.00	\$100.00
5/4/2020	Walter Smith	E-mails about extension of time for expert discovery, etc.	0.1	\$500.00	\$50.00
5/4/2020	Walter Smith	E-mails from J Murray re: expert depo, etc.	0.1	\$500.00	\$50.00
5/6/2020	Walter Smith	Stip mtn to xtnd deadlines filed, review and save to file.	0.1	\$500.00	\$50.00
5/7/2020	Walter Smith	Review discovery letter from OC. E-mail to team re: same, suggest confer ahead of a discovery conference.	0.2	\$500.00	\$100.00
5/7/2020	Walter Smith	E-mails between OC/Co Counsel about subpoena productions, etc.	0.1	\$500.00	\$50.00
5/8/2020	Walter Smith	Court order extends expert deadlines; update calendar and FWD to SED.	0.1	\$500.00	\$50.00
5/11/2020	Walter Smith	Legal research re: motion to compel/protective order issues.	2.3	\$500.00	\$1,150.00
5/11/2020	Walter Smith	Review discovery conf req ltr from OC; review requests/answers; e-mail to co counsel re: strategy in responding.	0.4	\$500.00	\$200.00
5/11/2020	Walter Smith	E-mails between co counsel, OC re discovery conf scheduling; with co counsel re: our position on same.	0.2	\$500.00	\$100.00
5/12/2020	Walter Smith	E-mails with co counsel, OC re: scheduling discovery conference, issues to be addressed.	0.1	\$500.00	\$50.00
5/12/2020	Walter Smith	E-mail from A Paronich re: discovery production. Review and save docs.	0.4	\$500.00	\$200.00
5/12/2020	Walter Smith	E-mails with co counsel re: Yodel bankruptcy.	0.3	\$500.00	\$150.00
5/13/2020	Walter Smith	Review latest revised notices of depositions for PillPack's witnesses; verify calendaring and save to file.	0.1	\$500.00	\$50.00
5/13/2020	Walter Smith	Review A Paronich email chains ahead of tomorrow's discovery conference.	0.4	\$500.00	\$200.00



Date	Timekeeper	Narrative	Units	Rate	Value
5/13/2020	Walter Smith	Locate, ID and compile docs for possible disclosure/logging. E-mail to co counsel re same.	0.4	\$500.00	\$200.00
5/14/2020	Walter Smith	Discovery conference with OC.	0.4	\$500.00	\$200.00
5/14/2020	Walter Smith	TC with co-counsel re: follow up tasks in discovery.	0.2	\$500.00	\$100.00
5/14/2020	Walter Smith	E-mails with co counsel, prep for discovery conf today.	0.2	\$500.00	\$100.00
5/14/2020	Walter Smith	Perform legal research and draft meet and confer letter to OC re: joint defense issues.	1.3	\$500.00	\$650.00
5/18/2020	Walter Smith	Draft outline for G Swindle dep. Confer with SED re: same.	3.6	\$500.00	\$1,800.00
5/18/2020	Walter Smith	E-mails re discovery.	0.2	\$500.00	\$100.00
5/19/2020	Walter Smith	E-mails with co counsel re various discovery issues and strategy moving forward.	0.2	\$500.00	\$100.00
5/19/2020	Walter Smith	Complete draft outline for G Swindle dep.	1.7	\$500.00	\$850.00
5/20/2020	Walter Smith	Emails with client, co-counsel re: supplemental discovery production/responses.	0.3	\$500.00	\$150.00
5/20/2020	Walter Smith	Telephone call with client, co-counsel re: supplemental discovery production/responses.	0.9	\$500.00	\$450.00
5/21/2020	Walter Smith	Emails with co-counsel re: discovery requests to defendant and meet and confer request.	0.3	\$500.00	\$150.00
5/22/2020	Walter Smith	TC with case team. Discuss discovery issues.	1	\$500.00	\$500.00
5/22/2020	Walter Smith	Receive e-mailed production from PillPack, download save to file.	0.2	\$500.00	\$100.00
5/22/2020	Walter Smith	Emails with co counsel, client re: recordings of calls today from PillPack.	0.1	\$500.00	\$50.00
5/25/2020	Walter Smith	E-mails with co-counsel re: discovery.	0.2	\$500.00	\$100.00
5/26/2020	Walter Smith	Discussions about discovery production.	0.6	\$500.00	\$300.00
5/26/2020	Walter Smith	Review files from client's discovery production.	0.9	\$500.00	\$450.00
5/26/2020	Walter Smith	Review draft supplemental responses and edits to same. E-mail to co-counsel itemizing suggested changes, plan for completing supplemental responses and production.	0.8	\$500.00	\$400.00
5/27/2020	Walter Smith	TC with J Murray re: various discovery matters.	0.3	\$500.00	\$150.00
5/27/2020	Walter Smith	TC with client regarding various discovery matters.	0.2	\$500.00	\$100.00
5/27/2020	Walter Smith	E-mails to/from co counsel re: discovery.	0.2	\$500.00	\$100.00
5/28/2020	Walter Smith	TC, texts and e-mails with client to [REDACTED]	0.4	\$500.00	\$200.00
5/28/2020	Walter Smith	E-mails with co counsel re: subpoenas for client's records.	0.5	\$500.00	\$250.00
5/28/2020	Walter Smith	Revisions to release for subpoena.	0.1	\$500.00	\$50.00
5/29/2020	Walter Smith	Attended deposition of G Swindle.	5.5	\$500.00	\$2,750.00
5/29/2020	Walter Smith	E-mails with co counsel re: various discovery issues.	0.3	\$500.00	\$150.00
6/1/2020	Walter Smith	Review and analyze depo transcript for G Swindle; notes on same.	2.7	\$500.00	\$1,350.00
6/1/2020	Walter Smith	Prepare draft outline for T McKnight dep and email to co counsel.	0.8	\$500.00	\$400.00
6/2/2020	Walter Smith	Review discovery notes; prepare draft outline of exhibits for Anja Ranneberg and email to SED.	0.4	\$500.00	\$200.00
6/2/2020	Walter Smith	Emails with co-counsel regarding documents for Ranneberg deposition.	0.1	\$500.00	\$50.00
6/2/2020	Walter Smith	Email to co counsel re: outline for Anja Ranneberg deposition.	0.1	\$500.00	\$50.00
6/5/2020	Walter Smith	Attended Ranneberg deposition.	3.5	\$500.00	\$1,750.00
6/9/2020	Walter Smith	Emails with co counsel re: 2nd set of doc requests; re: f/u on discovery issues; subpoena docs and joint defense agreement issues, etc.; review draft letter and set of discovery requests to PillPack.	0.4	\$500.00	\$200.00
6/11/2020	Walter Smith	E-mail from J Murray re: expert analysis .	0.1	\$500.00	\$50.00
6/11/2020	Walter Smith	Review and analyze PillPack's discovery responses to segregate M Dorf's invoicing for # of calls paid and \$ values, dates of same. Prepare summary for response J Murray analysis question.	2.2	\$500.00	\$1,100.00
6/12/2020	Walter Smith	E-mails with co-counsel re: expert report details.	0.1	\$500.00	\$50.00
6/12/2020	Walter Smith	TC with J Nuss re: expert report details.	0.2	\$500.00	\$100.00
6/12/2020	Walter Smith	Review and analyze call transfer records to [REDACTED] Prepare summary of same.	1.9	\$500.00	\$950.00
6/15/2020	Walter Smith	Emails re: depo scheduling, discovery conference, expert rebuttal reports.	0.2	\$500.00	\$100.00
6/15/2020	Walter Smith	Review draft expert reports for rebuttal.	0.8	\$500.00	\$400.00
6/16/2020	Walter Smith	Emails re: various discovery matters.	0.4	\$500.00	\$200.00
6/16/2020	Walter Smith	Confer with SED regarding strategy to obtain additional discovery.	0.5	\$500.00	\$250.00
6/17/2020	Walter Smith	Discovery conference with Blythe, OC. Prep notes.	0.7	\$500.00	\$350.00

Date	Timekeeper	Narrative	Units	Rate	Value
6/17/2020	Walter Smith	Team emails re: [REDACTED].	0.2	\$500.00	\$100.00
6/18/2020	Walter Smith	Legal research re: [REDACTED].	0.5	\$500.00	\$250.00
6/18/2020	Walter Smith	Emails with co counsel re JDA discovery issues	0.2	\$500.00	\$100.00
6/19/2020	Walter Smith	Emails re setting dep for C Anderson / Sponsler (oc-co counsel) and save copies of suppl reports of Plaintiffs experts to file.	0.2	\$500.00	\$100.00
6/26/2020	Walter Smith	Co counsel email re outstanding discov issues from OC.	0.1	\$500.00	\$50.00
6/29/2020	Walter Smith	Emails with co-counsel regarding discovery; class representative deposition date; case strategy.	0.1	\$500.00	\$50.00
6/30/2020	Walter Smith	Discovery, class cert, class rep dep emails	0.5	\$500.00	\$250.00
7/1/2020	Walter Smith	Emails with co-counsel regarding privilege issues raised by defendant; class representative deposition.	0.6	\$500.00	\$300.00
7/2/2020	Walter Smith	E-mails with co counsel, opposing counsel, client re: deposition of class representative; depositions of Pillpack witnesses; defendant's confidentiality designations.	0.4	\$500.00	\$200.00
7/6/2020	Walter Smith	E-mails from co counsel re: third party discovery.	0.2	\$500.00	\$100.00
7/7/2020	Walter Smith	E-mails from co counsel re: third party discovery.	0.3	\$500.00	\$150.00
7/8/2020	Walter Smith	E-mails with co counsel about subpoenas for third party discovery.	0.3	\$500.00	\$150.00
7/9/2020	Walter Smith	Reviewed Defendant's answers to Plaintiff's Second Set of Discovery Requests.	0.2	\$500.00	\$100.00
7/9/2020	Walter Smith	E-mails to and from co counsel, opposing counsel re: third party discovery; and email to client regarding deposition.	0.3	\$500.00	\$150.00
7/10/2020	Walter Smith	E-mails from co counsel, opposing counsel re: third party subpoena enforcement; and client regarding deposition.	0.3	\$500.00	\$150.00
7/13/2020	Walter Smith	Client and co counsel emails re depo prep / discovery	0.2	\$500.00	\$100.00
7/14/2020	Walter Smith	Review defendant's 2nd suppl discov resps and save to file.	0.5	\$500.00	\$250.00
7/14/2020	Walter Smith	Emails re Friday dep of C Anderson	0.3	\$500.00	\$150.00
7/15/2020	Walter Smith	Emails, texts with co counsel, client to schedule dep prep times.	0.4	\$500.00	\$200.00
7/15/2020	Walter Smith	Save to file 11th PP set of doc prod'n; review and notes on same.	0.4	\$500.00	\$200.00
7/16/2020	Walter Smith	Various case emails	0.5	\$500.00	\$250.00
7/17/2020	Walter Smith	Attended deposition of Ms. Anderson. Notes on same.	4	\$500.00	\$2,000.00
7/20/2020	Walter Smith	Emails with co counsel, OC, re discovery.	0.3	\$500.00	\$150.00
7/20/2020	Walter Smith	Receive depo transcript from court reporter. Brief review and save to file.	0.2	\$500.00	\$100.00
7/21/2020	Walter Smith	Emails with co counsel re: discovery, depo prep for class rep, class cert motion, etc.	0.6	\$500.00	\$300.00
7/21/2020	Walter Smith	TC with J Murray re: prep for class rep depo next week.	0.8	\$500.00	\$400.00
7/22/2020	Walter Smith	Review draft declaration, motion for class cert from B Chandler.	0.5	\$500.00	\$250.00
7/22/2020	Walter Smith	Review case file; e-mails with co counsel re: [REDACTED]	0.3	\$500.00	\$150.00
7/22/2020	Walter Smith	Review C Anderson depo transcript. Save to file.	0.8	\$500.00	\$400.00
7/22/2020	Walter Smith	Prep outline for class rep depo prep call; review case file.	0.9	\$500.00	\$450.00
7/22/2020	Walter Smith	Co counsel email re confidentiality designations.	0.1	\$500.00	\$50.00
7/23/2020	Walter Smith	TC with J Murray, client re: depo prep.	1.4	\$500.00	\$700.00
7/23/2020	Walter Smith	E-mails with J Murray re: depo prep; with B Chandler re: class rep's declaration for signature for class cert motion; with A Paronich re: class cert mtn.	0.6	\$500.00	\$300.00
7/23/2020	Walter Smith	OC email re confidential designations.	0.1	\$500.00	\$50.00
7/23/2020	Walter Smith	Prep declaration for my own signature; prep declaration for class rep signature.	0.6	\$500.00	\$300.00
7/23/2020	Walter Smith	Client delivers signed dec for class cert motion; save to file and e-mail to co counsel.	0.1	\$500.00	\$50.00
7/23/2020	Walter Smith	Save PP_Prod12 to case file and briefly review same.	0.2	\$500.00	\$100.00
7/24/2020	Walter Smith	Edits to draft declaration. (class cert)	0.3	\$500.00	\$150.00
7/24/2020	Walter Smith	Review and proposed edits to draft class cert motion. Compare notes with SED.	1.3	\$500.00	\$650.00
7/27/2020	Walter Smith	Review and analyze [REDACTED]. Emails with co counsel re discovery topics ahead of tomorrow's deposition.	0.5	\$500.00	\$250.00
7/27/2020	Walter Smith	Emails re depo attendance	0.1	\$500.00	\$50.00
7/27/2020	Walter Smith	Review and analyze documents as filed Fri by co counsel. Discuss with SED.	1.4	\$500.00	\$700.00

Date	Timekeeper	Narrative	Units	Rate	Value
7/28/2020	Walter Smith	Test out software for deposition.	0.1	\$500.00	\$50.00
7/28/2020	Walter Smith	Emails with co counsel, client re: tomorrow's dep. Review instructions and attach for client. Texts with client.	0.2	\$500.00	\$100.00
7/29/2020	Walter Smith	Prepare for, debrief from and attend virtual deposition of plaintiff. Review motion to stay. Legal research re same. Sketch out counterarguments and e-mails with case team re ideas for same.	4.2	\$500.00	\$2,100.00
7/31/2020	Walter Smith	TC with client and discuss latest developments in this case.	2.4	\$500.00	\$1,200.00
8/4/2020	Walter Smith	Review latest communications re discovery with OC; ltr to OC re: discovery issues. (after exchanging emails with co counsel re same.)	0.3	\$500.00	\$150.00
8/4/2020	Walter Smith	TC with J Murray re discovery topics, etc	0.5	\$500.00	\$250.00
8/4/2020	Walter Smith	Email J Murray re [REDACTED]	0.1	\$500.00	\$50.00
8/5/2020	Walter Smith	Review and analyze draft stay mtn opp. Edits incorporating my own, and SED cmts; and emails with co counsel re same.	0.1	\$500.00	\$50.00
8/5/2020	Walter Smith	Emails with co counsel re depo exhibits for class rep dep, other topics.	1.7	\$500.00	\$850.00
8/5/2020	Walter Smith	Emails with co counsel re depo exhibits for class rep dep, other topics.	0.2	\$500.00	\$100.00
8/6/2020	Walter Smith	Emails with co counsel re opp to mtn to stay. Review edits to same.	0.3	\$500.00	\$150.00
8/7/2020	Walter Smith	Review discovery. Pull together documents for batesting/production/ID in priv log. Prep priv log.	0.3	\$500.00	\$150.00
8/7/2020	Walter Smith	TCs with co counsel re: today's doc production.	1.8	\$500.00	\$900.00
8/7/2020	Walter Smith	Emails with co counsel re today's doc prodn	0.3	\$500.00	\$150.00
8/7/2020	Walter Smith	Emails to co counsel, OC re production/discovery follow up questions. Approve docs to be produced.	0.3	\$500.00	\$150.00
8/7/2020	Walter Smith	Emails re opp to mtn to stay; re: service of suppl production of pltf (discov) on def TC with J Nuss. Compile documents for service on defendant in plaintiff's supplemental production. Note items in privilege log.	0.5	\$500.00	\$250.00
8/7/2020	Walter Smith	TC with J Nuss. Compile documents for service on defendant in plaintiff's supplemental production. Note items in privilege log.	0.5	\$500.00	\$250.00
8/7/2020	Walter Smith	Co counsel emails re mtn to stay opp changes, filing of same.	2.8	\$500.00	\$1,400.00
8/10/2020	Walter Smith	Co counsel emails re mtn to stay opp changes, filing of same.	0.4	\$500.00	\$200.00
8/11/2020	Walter Smith	Emails with OC, co counsel re discovery requests for Pillpack joint defense materials and call scheduling re: same.	0.3	\$500.00	\$150.00
8/12/2020	Walter Smith	Emails re suppl doc prodn of pl; re: various discovery topics / mtn to seal draft	0.3	\$500.00	\$150.00
8/13/2020	Walter Smith	E-mails with co counsel, opposing counsel regarding scheduling of discovery conference.	0.3	\$500.00	\$150.00
8/17/2020	Walter Smith	Emails with co counsel re discovery topics, with OC re same	0.4	\$500.00	\$200.00
8/17/2020	Walter Smith	Discovery conf with OC.	0.3	\$500.00	\$150.00
8/18/2020	Walter Smith	Emails re discovery dispute over DNC list	0.2	\$500.00	\$100.00
8/19/2020	Walter Smith	Emails re joint discovery mtn. Emails with co counsel, opposing counsel regarding discovery issues, class certification issues; legal research regarding same.	0.4	\$500.00	\$200.00
8/20/2020	Walter Smith	Review and analyze legal research materials on [REDACTED]	0.6	\$500.00	\$300.00
8/20/2020	Walter Smith	Review and analyze [REDACTED]	1.8	\$500.00	\$900.00
8/20/2020	Walter Smith	Review and analyze [REDACTED]	1.6	\$500.00	\$800.00
8/24/2020	Walter Smith	Emails with co counsel re: depo transcripts, re: class cert opp and reply outline	0.2	\$500.00	\$100.00
8/24/2020	Walter Smith	Factual and legal research (i.e review depo transcripts, add cites and drafting for joint discov mtn)	1.8	\$500.00	\$900.00
8/24/2020	Walter Smith	Review and analyze def's opp to class cert. Write up thoughts on same.	1.4	\$500.00	\$700.00
8/24/2020	Walter Smith	Draft plaintiff part of joint discovery motion.	2.4	\$500.00	\$1,200.00
8/25/2020	Walter Smith	Review, edits to draft joint discovery mtn and emails with co counsel.	1.3	\$500.00	\$650.00
8/26/2020	Walter Smith	Emails re Def will produce full DNC list Fri	0.1	\$500.00	\$50.00
8/31/2020	Walter Smith	Emails re mtn to seal ex; errata sheet from plaintiff	0.2	\$500.00	\$100.00
8/31/2020	Walter Smith	Review and analyze data from DNC list production from PillPack. Conf with SED re: same.	1.5	\$500.00	\$750.00
9/1/2020	Walter Smith	Order reassigning case and discuss with SED	0.1	\$500.00	\$50.00
9/2/2020	Walter Smith	Legal research regarding class certification and emails with SED re same.	0.2	\$500.00	\$100.00
9/2/2020	Walter Smith	Review and analyze DNC records from PP today. Email to team re same.	0.9	\$500.00	\$450.00
9/2/2020	Walter Smith	Review suppl Barsky decl by PillPack. Compare earlier decl.	0.2	\$500.00	\$100.00
9/3/2020	Walter Smith	Emails with co counsel re: drafting of class cert reply. Edits to same. Note SJM filed by PP. Review documents produced today by Fluent, PillPack; e-mails with co counsel and review/edits to reply ISO class cert brief; review and notes on def's SJM; call with co counsel re drafting SJM opp	1.9	\$500.00	\$950.00
9/4/2020	Walter Smith	Review documents produced today by Fluent, PillPack; e-mails with co counsel and review/edits to reply ISO class cert brief; review and notes on def's SJM; call with co counsel re drafting SJM opp	2.1	\$500.00	\$1,050.00

Date	Timekeeper	Narrative	Units	Rate	Value
9/8/2020	Walter Smith	Review and analyze depo transcr's and discovery; prep draft SJ opp	4.4	\$500.00	\$2,200.00
9/9/2020	Walter Smith	Co counsel emails re consent issues, re drafting SJ opp	0.2	\$500.00	\$100.00
9/9/2020	Walter Smith	Review discovery materials (esp transcr's for depts); prep draft SJ opp materials	3.4	\$500.00	\$1,700.00
9/10/2020	Walter Smith	Emails with co counsel re discovery issues for conference; re our draft outline of facts for SJ opp.	0.3	\$500.00	\$150.00
9/10/2020	Walter Smith	Finalize draft facts excerpts for co counsel review	0.8	\$500.00	\$400.00
9/11/2020	Walter Smith	Emails with co counsel/OC re discovery	0.3	\$500.00	\$150.00
9/14/2020	Walter Smith	E-mails with co counsel re: draft subpoena to Fluent (and propose edits on same); re: today's scheduled discovery conference with OC.	0.3	\$500.00	\$150.00
9/15/2020	Walter Smith	Discovery conference with OC.	0.7	\$500.00	\$350.00
9/15/2020	Walter Smith	Identified relevant facts for summary judgment opposition; e-mail to co counsel re: same.	0.5	\$500.00	\$250.00
9/15/2020	Walter Smith	Review briefing filed on motion for leave to file Barsky dec (our opp).	0.3	\$500.00	\$150.00
9/17/2020	Walter Smith	Emails re: rog responses, JDA's.	0.2	\$500.00	\$100.00
9/18/2020	Walter Smith	Emails with co counsel re: various discovery topics; from OC re: discovery.	0.4	\$500.00	\$200.00
9/18/2020	Walter Smith	Review and analyze PP discovery production today about [REDACTED]	1.6	\$500.00	\$800.00
9/21/2020	Walter Smith	Review, cmnts/edits on draft opp to SJM.	1.5	\$500.00	\$750.00
9/21/2020	Walter Smith	Co counsel, OC emails re: confidentiality designations for opp to SJM.	0.2	\$500.00	\$100.00
9/22/2020	Walter Smith	Review PP priv log. (Produced today)	0.2	\$500.00	\$100.00
9/25/2020	Walter Smith	Defendant reply to SJM filed. Review and save to file.	0.8	\$500.00	\$400.00
9/28/2020	Walter Smith	Co counsel, OC emails about Fluent third party discovery issues.	0.1	\$500.00	\$50.00
9/29/2020	Walter Smith	Co counsel emails about Fluent third party discovery.	0.2	\$500.00	\$100.00
9/30/2020	Walter Smith	Co counsel emails re Fluent third party discovery issues.	0.2	\$500.00	\$100.00
10/2/2020	Walter Smith	Co-counsel, OC emails re: Fluent deposition, service issues.	0.2	\$500.00	\$100.00
10/5/2020	Walter Smith	Emails between co -counsel, OC re: depo scheduling (Fluent/Barsky); ECF notices and save response to mtn to seal.	0.2	\$500.00	\$100.00
10/7/2020	Walter Smith	Emails with co-counsel re: Fluent deposition; with B Chandler and OC about confidential information in court filing.	0.5	\$500.00	\$250.00
10/26/2020	Walter Smith	Co counsel email re [REDACTED]	0.1	\$500.00	\$50.00
10/27/2020	Walter Smith	OC email re: [REDACTED].	0.1	\$500.00	\$50.00
10/28/2020	Walter Smith	Review and analyze [REDACTED]. Notes to file re: same and e-mail to team.	2.8	\$500.00	\$1,400.00
10/28/2020	Walter Smith	Correspondence with case team re: [REDACTED]	0.2	\$500.00	\$100.00
10/29/2020	Walter Smith	Emails re: [REDACTED]	0.1	\$500.00	\$50.00
11/4/2020	Walter Smith	Emails re latest discovery issue: call recording production. Emails re Fluent subpoena process from Jennifer Murray.	0.3	\$500.00	\$150.00
11/4/2020	Walter Smith	Call with Jennifer M re: Fluent subpoena progress, call recordings from PillPack. Notes re same to file.	0.3	\$500.00	\$150.00
11/9/2020	Walter Smith	Discovery conference with OC.	0.3	\$500.00	\$150.00
11/9/2020	Walter Smith	Call with co-counsel re: choosing recordings sample for discovery production from PillPack (and Jodi)	0.5	\$500.00	\$250.00
11/12/2020	Walter Smith	Review subpoenas duces tecum from co counsel to BBB.	0.1	\$500.00	\$50.00
11/13/2020	Walter Smith	Email from co counsel. Note subpoenas to be served on various 3rd parties.	0.1	\$500.00	\$50.00
11/19/2020	Walter Smith	B Chandler e-mail to OC re: request for confirmation about supplemental discovery responses to be provided.	0.1	\$500.00	\$50.00
11/20/2020	Walter Smith	E-mail from OC re: ongoing search for responsive records on Slack/recordings discovery. E-mails from co-counsel re: [REDACTED]	0.2	\$500.00	\$100.00
11/24/2020	Walter Smith	Co-counsel e-mails re: [REDACTED]	0.1	\$500.00	\$50.00
11/30/2020	Walter Smith	Notice from co counsel of intent to serve document subpoena on BBB/New Hampshire.	0.1	\$500.00	\$50.00
12/3/2020	Walter Smith	E-mails between B Chandler, M Almeida re: Slack files/call recordings document production.	0.1	\$500.00	\$50.00
12/11/2020	Walter Smith	PP produces 11th installment of docs responsive to discovery. Save to file and organize.	0.2	\$500.00	\$100.00
12/14/2020	Walter Smith	E-mails with case team about [REDACTED]	0.3	\$500.00	\$150.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/15/2020	Walter Smith	Exchanged emails regarding calling recording review. Enter data into form spreadsheet for tracking.	0.9	\$500.00	\$450.00
12/16/2020	Walter Smith	Review recordings of telemarketing calls. E-mails with co counsel about key highlighted recordings.	1.9	\$500.00	\$950.00
12/17/2020	Walter Smith	Review recordings provided by defendant (calls with class members).	2.8	\$500.00	\$1,400.00
12/17/2020	Walter Smith	E-mails with SED; compile data into spreadsheet from SED, my own review of call recordings.	0.5	\$500.00	\$250.00
12/18/2020	Walter Smith	Finalize notes on call review to share with team; e-mails with co counsel summarizing results of call review using recordings received from PillPack.	0.4	\$500.00	\$200.00
12/21/2020	Walter Smith	E-mails with co counsel about call recordings review; about motion to supplement the record.	0.2	\$500.00	\$100.00
12/22/2020	Walter Smith	E-mails with co counsel re: motion to supplement. Edits to same (draft).	1.1	\$500.00	\$550.00
12/23/2020	Walter Smith	Co counsel, OC emails about production of documents (Slack); about resetting deadlines into new year for hearing dates, etc.	0.3	\$500.00	\$150.00
1/4/2021	Walter Smith	Save production from PillPack to case file (discovery with the Slack messages included). E-mails with SED re: same.	0.2	\$500.00	\$100.00
1/5/2021	Walter Smith	E-mails with co counsel about password for Slack documents recently produced by defendant.	0.2	\$500.00	\$100.00
1/8/2021	Walter Smith	Review court order on SJ denied to defendant. E-mails with co counsel re: same.	0.3	\$500.00	\$150.00
1/14/2021	Walter Smith	E-mails with case team re: motion to supplement draft (and review and edits to same); e-mails about court's order on supplemental briefing today.	0.9	\$500.00	\$450.00
1/15/2021	Walter Smith	Review court's rulings on supplementing the record for class certification.	0.2	\$500.00	\$100.00
1/15/2021	Walter Smith	Meet with SED and prepare for call with case team by reviewing court's order on class cert suppl briefing. Call with case team about briefing plan.	0.5	\$500.00	\$250.00
1/18/2021	Walter Smith	Review memo, cases identified by AP in e-mail about supplemental briefing.	0.2	\$500.00	\$100.00
1/20/2021	Walter Smith	Legal research on [REDACTED]	1.7	\$500.00	\$850.00
1/21/2021	Walter Smith	Complete legal research, [REDACTED] prepare brief summary and send to co counsel via e-mail.	1.8	\$500.00	\$900.00
1/21/2021	Walter Smith	Case team e-mails about briefing on class cert supplement; meet and confer with PillPack about JSR.	0.2	\$500.00	\$100.00
1/22/2021	Walter Smith	Emails with case team about PillPack's draft JSR document, case schedule.	0.3	\$500.00	\$150.00
1/24/2021	Walter Smith	Co counsel emails commenting on draft JSR for this case.	0.1	\$500.00	\$50.00
1/28/2021	Walter Smith	E-mails among co counsel re: draft JSR provided today by PillPack; case scheduling and class notice considerations. Review draft JSR to prepare my comments to the group.	0.6	\$500.00	\$300.00
1/28/2021	Walter Smith	Phone call with defense counsel to discuss joint status report, potential evidentiary issues re: their consent defense suggested by their draft JSR contribution. Prepare and save notes on same to file.	0.3	\$500.00	\$150.00
1/29/2021	Walter Smith	E-mails among co counsel about [REDACTED]	0.2	\$500.00	\$100.00
2/1/2021	Walter Smith	Emails with co counsel about draft joint status report; damages and membership count for the class based on Jodi's research; deposition transcript of Josh Grant (from the Royal Cruises case in LA) and review opinion from Judge Bashant dismissing class claims in that case to distinguish PillPack. Forward Josh Grant transcript to SED.	1.2	\$500.00	\$600.00
2/4/2021	Walter Smith	Emails among co counsel about our briefing on the supplemental class cert issues.	0.1	\$500.00	\$50.00
2/5/2021	Walter Smith	E-mails with co counsel, OC re: our draft of the supplemental brief, re: defendant's agreement to file JSR today.	0.3	\$500.00	\$150.00
2/7/2021	Walter Smith	Review and edits to draft brief on class cert.	0.4	\$500.00	\$200.00
2/11/2021	Walter Smith	Review defendant's brief on class cert (supplement). E-mail to SED summarizing same.	0.1	\$500.00	\$50.00
2/12/2021	Walter Smith	Co counsel e-mails with each other about billing issues / expert report.	0.7	\$500.00	\$350.00
2/12/2021	Walter Smith	Receive ECF notice re: motion for class cert granted. Review court's order. E-mails with co-counsel re: same. Set call with the team.	0.5	\$500.00	\$250.00
2/12/2021	Walter Smith	TC with case team. Discuss class cert order and way forward.	0.3	\$500.00	\$150.00
2/12/2021	Walter Smith	Misc e-mails re: pretrial order entered by court; notify client re: trial date, class certification; co counsel emails about preservation letter for Yodel.	0.2	\$500.00	\$100.00
2/17/2021	Walter Smith	J Murray, A Paronich e-mails re: notice administration bid.	0.1	\$500.00	\$50.00
2/18/2021	Walter Smith	J Murray e-mail re: additional notice plan vendor suggestion.	0.1	\$500.00	\$50.00
2/19/2021	Walter Smith	Additional ECF notice / clarification from the court re: case deadlines.	0.1	\$500.00	\$50.00

Date	Timekeeper	Narrative	Units	Rate	Value
2/22/2021	Walter Smith	Co-counsel e-mails to one another about bids from notice vendors.	0.1	\$500.00	\$50.00
2/26/2021	Walter Smith	Co-counsel e-mails re: notice plan bids; draft notice forms for class.	0.2	\$500.00	\$100.00
3/1/2021	Walter Smith	Co-counsel emails from this weekend re: notice plan, subpoena to Yodel, PillPack's motion for reconsideration.	0.2	\$500.00	\$100.00
3/1/2021	Walter Smith	Read PillPack's motion for reconsideration and e-mail co counsel re same.	0.4	\$500.00	\$200.00
3/1/2021	Walter Smith	E-mails from co counsel re Yodel subpoenas.	0.1	\$500.00	\$50.00
3/1/2021	Walter Smith	Review and analyze draft notices for class members. Add notes/comments to same and e-mail to group attaching for review.	0.9	\$500.00	\$450.00
3/1/2021	Walter Smith	J Murray emails about draft notices for class, notice plan to file later this week.	0.1	\$500.00	\$50.00
3/2/2021	Walter Smith	A Paronich message to Yodel counsel about discovery supplement.	0.1	\$500.00	\$50.00
3/2/2021	Walter Smith	Review court's minute order denying motion to reconsider class certification ruling. E-mails with co counsel re: same.	0.4	\$500.00	\$200.00
3/8/2021	Walter Smith	Review Rule 23(f) appeal standard authority. E-mail to SED re: same.	0.5	\$500.00	\$250.00
3/8/2021	Walter Smith	J Murray e-mail re: notice plan motion draft.	0.1	\$500.00	\$50.00
3/9/2021	Walter Smith	Review latest draft notice plan. E-mail to case team re: same.	0.2	\$500.00	\$100.00
3/9/2021	Walter Smith	E-mails among case team about [REDACTED]. I review draft declaration and offer input on same.	0.8	\$500.00	\$400.00
3/10/2021	Walter Smith	Co-counsel e-mails about details of notice plan.	0.4	\$500.00	\$200.00
3/11/2021	Walter Smith	E-mails among co-counsel, with OC re: notice plan proposal.	0.8	\$500.00	\$400.00
3/11/2021	Walter Smith	Co-counsel files motion, supporting docs for notice plan. Save to file.	0.2	\$500.00	\$100.00
3/15/2021	Walter Smith	Co counsel emails re: Yodel data. E-mails about [REDACTED]	0.2	\$500.00	\$100.00
3/18/2021	Walter Smith	[REDACTED]	0.5	\$500.00	\$250.00
3/25/2021	Walter Smith	Update calendar with pretrial order deadlines.	0.2	\$500.00	\$100.00
3/29/2021	Walter Smith	J Murray e-mail re: PP response to ntc plan. Review PP response.	0.4	\$500.00	\$200.00
3/29/2021	Walter Smith	Re: various topics concerning discovery, etc.	0.3	\$500.00	\$150.00
3/30/2021	Walter Smith	Producing docs per yesterday's notifications from TMDW.	0.1	\$500.00	\$50.00
4/1/2021	Walter Smith	Review Duguid decision issued today by SCOTUS. Emails with case team re same.	0.4	\$500.00	\$200.00
4/1/2021	Walter Smith	E-mails between co counsel re: discussion with LBM counsel.	0.1	\$500.00	\$50.00
4/1/2021	Walter Smith	Review PillPack's opposition to notice plan. Review draft brief on notice to class members (reply ISO notice plan). Research about [REDACTED]	0.3	\$500.00	\$150.00
4/1/2021	Walter Smith	[REDACTED]	0.9	\$500.00	\$450.00
4/1/2021	Walter Smith	E-mails with co counsel about draft notice plan; review brief and emails about possible revisions to same.	1	\$500.00	\$500.00
4/1/2021	Walter Smith	Emails with co counsel about tomorrow phone call re Little Brook Media subpoena response. Confer with SED re: edits to brief on notice to class members. Draft proposed additional language for same. E-mail to case team.	0.1	\$500.00	\$50.00
4/2/2021	Walter Smith	E-mail case team re: call this morning.	0.8	\$500.00	\$400.00
4/2/2021	Walter Smith	E-mails with case team regarding draft briefing concerning notice plan.	0.1	\$500.00	\$50.00
4/2/2021	Walter Smith	E-mails with case team regarding draft briefing concerning notice plan.	0.3	\$500.00	\$150.00
4/2/2021	Walter Smith	Review reply brief on notice plan. Draft additional suggested language for same.	0.3	\$500.00	\$150.00
4/6/2021	Walter Smith	Review court order re: JSR about notice plan and class member count. Discussion with SED re: yesterday's minute order. Review court's order and Feb's class cert order and intervening e-mail communications, developments in this case. Prepare notes about the notice plan order.	0.1	\$500.00	\$50.00
4/7/2021	Walter Smith	TC with OC, case team re: preparing JSR.	1.1	\$500.00	\$550.00
4/16/2021	Walter Smith	Write up notes on today's JSR call and email to SED for update.	0.6	\$500.00	\$300.00
4/16/2021	Walter Smith	Read JSR. Familiarize self with latest positions on class definition issues; extent of folks within our class.	0.3	\$500.00	\$150.00
4/26/2021	Walter Smith	E-mails with co counsel and review draft letter about discovery issues.	0.3	\$500.00	\$150.00
4/27/2021	Walter Smith	E-mails with co counsel about [REDACTED]	0.2	\$500.00	\$100.00
4/28/2021	Walter Smith	[REDACTED]	0.3	\$500.00	\$150.00
4/28/2021	Walter Smith	ECF notice re court's order today on notice issues. Review and save.	0.2	\$500.00	\$100.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/6/2021	Walter Smith	Review letter from OC re: asserted privileges between PillPack and Fluent.	0.2	\$500.00	\$100.00
5/24/2021	Walter Smith	J Murray email re plan to file JSR.	0.1	\$500.00	\$50.00
5/25/2021	Walter Smith	Emails re draft for JSR. Review same.	0.5	\$500.00	\$250.00
6/1/2021	Walter Smith	Emails re JSR draft between co counsel, OC.	0.2	\$500.00	\$100.00
6/1/2021	Walter Smith	Reviewed e-mail correspondence from co-counsel, opposing counsel regarding joint status report on class notice, third party discovery document production.	0.2	\$500.00	\$100.00
6/2/2021	Walter Smith	Save to file and review JSR as filed.	0.5	\$500.00	\$250.00
6/4/2021	Walter Smith	Review motion to stay filed by PP (saved to case file).	0.4	\$500.00	\$200.00
6/9/2021	Walter Smith	Review and analyze documents produced today by co-counsel (correspondence with subpoena recipients). Save documents to discovery folder.	0.3	\$500.00	\$150.00
6/10/2021	Walter Smith	Review and analyze discovery request from OC. E-mails with co-counsel re: our plan to respond to same.	0.6	\$500.00	\$300.00
6/11/2021	Walter Smith	TC with co-counsel re: discovery requests from PP. Notes to file.	0.8	\$500.00	\$400.00
6/14/2021	Walter Smith	Review e-mails and suggested edits from co-counsel about opposition to motion for stay. Comments to draft and include in message to team.	0.5	\$500.00	\$250.00
6/15/2021	Walter Smith	Review and analyze case files to identify potentially responsive materials for PillPack's discovery. E-mails with case team re: same.	1.6	\$500.00	\$800.00
6/16/2021	Walter Smith	TC with client re: discovery requests. Notes to file.	1	\$500.00	\$500.00
6/17/2021	Walter Smith	Emails with case team re: discovery responses.	0.1	\$500.00	\$50.00
6/18/2021	Walter Smith	E-mails with co-counsel regarding privilege log, email response to OC request for position on discovery objections, privilege log items.	0.3	\$500.00	\$150.00
6/21/2021	Walter Smith	Draft responses to discovery requests.	2.7	\$500.00	\$1,350.00
6/21/2021	Walter Smith	Draft privilege log. Review materials to include in same.	0.5	\$500.00	\$250.00
6/22/2021	Walter Smith	Complete draft discovery responses.	1.4	\$500.00	\$700.00
6/22/2021	Walter Smith	Email to case team with draft discovery responses attached.	0.1	\$500.00	\$50.00
6/23/2021	Walter Smith	Email to defendant re: question about when privilege log will be done.	0.1	\$500.00	\$50.00
6/28/2021	Walter Smith	E-mail from J Murray re: discovery responses.	0.1	\$500.00	\$50.00
6/28/2021	Walter Smith	Email about draft responses to 2nd requests for discovery.	0.1	\$500.00	\$50.00
6/29/2021	Walter Smith	With J Murray. Discuss discovery responses (PillPack's 2nd set of requests).	0.8	\$500.00	\$400.00
6/29/2021	Walter Smith	E-mails with co-counsel re: call today.	0.2	\$500.00	\$100.00
6/30/2021	Walter Smith	Email with case team about discovery email I am going to send OC.	0.1	\$500.00	\$50.00
6/30/2021	Walter Smith	Email to OC re discovery; RFP 16 and suppl response about priv log etc.	0.1	\$500.00	\$50.00
7/1/2021	Walter Smith	Emails with co counsel about discovery; signing of plaintiff's responses.	0.2	\$500.00	\$100.00
7/5/2021	Walter Smith	TC to client respond to VM about our plan for timeline to get his responses/answers to discovery signed next week after his vacation. LM for client.	0.2	\$500.00	\$100.00
7/6/2021	Walter Smith	Review documents in case file / communications related to past litigation in NPAI/MFAI cases. Draft privilege log for PP's RFP 16.	2.9	\$500.00	\$1,450.00
7/6/2021	Walter Smith	E-mails with co-counsel re: discovery issues.	0.2	\$500.00	\$100.00
7/7/2021	Walter Smith	E-mails with case team / J Murray re: notice plan; discovery topics.	0.7	\$500.00	\$350.00
7/7/2021	Walter Smith	Review documents in case file / communications related to past litigation in NPAI/MFAI cases. Draft privilege log for PP's RFP 16.	3.2	\$500.00	\$1,600.00
7/8/2021	Walter Smith	With J Murray. Talk about RFP 16 supplement plan.	1.1	\$500.00	\$550.00
7/8/2021	Walter Smith	E-mails between J Murray, A Paronich re: documents for discovery.	0.2	\$500.00	\$100.00
7/8/2021	Walter Smith	Review potential discovery responses. E-mails with J Murray re same; and draft response to PP RFP 16.	1.8	\$500.00	\$900.00
7/8/2021	Walter Smith	Review and analyze docs in my file and note potential privilege/responsiveness issues for written objections etc.; e-mails with J Murray re: same.	1.6	\$500.00	\$800.00
7/9/2021	Walter Smith	E-mail from co-counsel re: this case, subpoena to be issued.	0.1	\$500.00	\$50.00
7/12/2021	Walter Smith	Edits to draft discovery responses. Review 2d supplemental responses. E-mail to case team.	0.4	\$500.00	\$200.00
7/15/2021	Walter Smith	E-mails between self, client, and co-counsel re: verification page for client's rog responses.	0.2	\$500.00	\$100.00
7/20/2021	Walter Smith	Co-counsel e-mails re: service of subpoena on Yodel; re: class data.	0.2	\$500.00	\$100.00

Date	Timekeeper	Narrative	Units	Rate	Value
7/22/2021	Walter Smith	E-mails with J Murray re: notice plan and discovery; with SED re same.	0.3	\$500.00	\$150.00
7/29/2021	Walter Smith	A Paronich email re: Yodel deposition scheduling.	0.1	\$500.00	\$50.00
8/2/2021	Walter Smith	E-mails among co-counsel about discovery and Yodel deposition.	0.2	\$500.00	\$100.00
8/3/2021	Walter Smith	E-mails with co-counsel about draft notices for amended notice plan; review and edits to same.	0.5	\$500.00	\$250.00
8/4/2021	Walter Smith	Review and edits to draft amended motion to approve notice plan.	0.4	\$500.00	\$200.00
8/4/2021	Walter Smith	E-mails with co-counsel re: draft amended motion to approve notice plan.	0.1	\$500.00	\$50.00
8/5/2021	Walter Smith	Email from J Murray re draft amended motion to approve notice plan.	0.1	\$500.00	\$50.00
8/6/2021	Walter Smith	Review latest draft from J Murray re amended motion to approve notice plan. No changes.	0.3	\$500.00	\$150.00
8/25/2021	Walter Smith	TC with Jennifer M re: prep for discovery conference Monday.	0.5	\$500.00	\$250.00
8/26/2021	Walter Smith	Review and analyze latest discovery conf req ltr from OC. Draft response. Review all objections / answers in course of same. E-mail to group for discussion.	3	\$500.00	\$1,500.00
8/27/2021	Walter Smith	TC with B Chandler re: prep for discovery conference.	0.2	\$500.00	\$100.00
8/30/2021	Walter Smith	With co-counsel re: preparation for discovery conference today.	1	\$500.00	\$500.00
8/30/2021	Walter Smith	TC with client to discuss proposed protocol for electronic inspection of devices.	0.2	\$500.00	\$100.00
8/30/2021	Walter Smith	with J Murray; f/u re: call with AW today (client)	0.1	\$500.00	\$50.00
8/31/2021	Walter Smith	E-mails with W Salim re [REDACTED]. E-mails with Jen and Blythe re: [REDACTED]. E-mails with co counsel re recent discovery conference fu plan.	1.1	\$500.00	\$550.00
9/1/2021	Walter Smith	Emails with co counsel, client re device inspection remote imaging option.	0.4	\$500.00	\$200.00
9/1/2021	Walter Smith	Co counsel, OC emails about depo schedule.	0.3	\$500.00	\$150.00
9/2/2021	Walter Smith	Review client message with [REDACTED]. E-mails with Jen M re same. Co counsel emails to OC about depo dates.	0.5	\$500.00	\$250.00
9/3/2021	Walter Smith	Jen M email to Yodel counsel re this depo completion.	0.1	\$500.00	\$50.00
9/7/2021	Walter Smith	Emails re 1) imaging / searches of Pltf devices (co counsel emails); 2) subpoenas and depo schedule per PP's subpoenas; 3) f/u emails to OC and doc production 2dary to recent discovery conf.	0.7	\$500.00	\$350.00
9/8/2021	Walter Smith	E-mails re: 1) device inspection; 2) subpoenas Def issued to 3d parties (OC emails here); briefing on mtn to modify class definition.	0.4	\$500.00	\$200.00
9/8/2021	Walter Smith	Review and comments on draft motion to modify class definition. Review and no comments on reply ISO mtn to approve ntc plan.	0.4	\$500.00	\$200.00
9/9/2021	Walter Smith	Emails with OC, co counsel re: 1) requested time xtn on resp / mtn to enlarge class; 2) deposition dates for subpoenaed parties (by PillPack); 3) device inspection protocol (review and analyze past discovery conference notes and vendor quote to answer Q re what phone pltf owns).	0.9	\$500.00	\$450.00
9/10/2021	Walter Smith	Prepare draft stipulation for device inspection / Plaintiff's personal devices.	1.4	\$500.00	\$700.00
9/10/2021	Walter Smith	E-mails with co counsel about 1) proposed protocol for device inspection; 2) Def request for time xtn on response to mtn to change class def'n; 3) additional discovery suppl to name witnesses with knowledge; 4) Yodel dep continuation.	0.8	\$500.00	\$400.00
9/10/2021	Walter Smith	Telephone call with co counsel J Murray regarding plaintiff's discovery responses, privilege log.	0.4	\$500.00	\$200.00
9/13/2021	Walter Smith	E-mails among co-counsel, OC re discovery, various topics.	0.3	\$500.00	\$150.00
9/14/2021	Walter Smith	Discovery related emails among OC, co counsel; review ECF notices and note updated case briefing deadlines.	0.2	\$500.00	\$100.00
9/15/2021	Walter Smith	Attention to discovery related emails among OC, co counsel.	0.3	\$500.00	\$150.00
9/16/2021	Walter Smith	Emails with vendor, co-counsel and TC with vendor re device inspection.	0.5	\$500.00	\$250.00
9/17/2021	Walter Smith	TC with client about device inspection protocol.	0.8	\$500.00	\$400.00
9/17/2021	Walter Smith	Emails with client, Jen Murray re: device inspection protocol details and client's input re same.	0.8	\$500.00	\$400.00
9/17/2021	Walter Smith	Emails among team, with OC re: f/u about our privilege log updates; defendant's discovery supplement due Wed 9/22.	0.2	\$500.00	\$100.00
9/17/2021	Walter Smith	Email to poss 2d vendor re discovery plan / device inspection.	0.1	\$500.00	\$50.00
9/18/2021	Walter Smith	Edits to draft device inspection protocol. Emails with client re: same and with J Murray to advise re client's approval.	0.6	\$500.00	\$300.00



Date	Timekeeper	Narrative	Units	Rate	Value
9/20/2021	Walter Smith	E-mail J Murray re: device inspection protocol.	0.1	\$500.00	\$50.00
9/21/2021	Walter Smith	TC with J Murray re: device inspection protocol and our game plan.	0.2	\$500.00	\$100.00
9/21/2021	Walter Smith	Email to co counsel proposing message to client about device inspection protocol edits. J Murray response to same.	0.1	\$500.00	\$50.00
9/21/2021	Walter Smith	Email to client [REDACTED].	0.1	\$500.00	\$50.00
9/22/2021	Walter Smith	Telephone conference with J Murray, A Williams re: discovery. Review and analyze documents in case file to locate privileged materials. Save and compile, Bates stamp same.	0.3	\$500.00	\$150.00
9/22/2021	Walter Smith	Update Privilege Log. Email to OC once complete.	3.7	\$500.00	\$1,850.00
9/23/2021	Walter Smith	TC with co counsel. Go over our strategy, game plan for various trial preparation topics, and discovery issues.	0.6	\$500.00	\$300.00
9/23/2021	Walter Smith	Discovery conference with OC re: device inspection protocol.	0.5	\$500.00	\$250.00
9/24/2021	Walter Smith	AP email with outline of depo of Lexis witness. Jen M email to OC re Fluent depo. E-mails with case team re: dispute over discovery with OC, re depositions, doc supplements/answers to Pltf's	0.1	\$500.00	\$50.00
9/27/2021	Walter Smith	discovery.	0.2	\$500.00	\$100.00
9/27/2021	Walter Smith	Client texts about discovery. Emails with J Murray re same.	0.2	\$500.00	\$100.00
9/28/2021	Walter Smith	TCs with Vestige, texts with client re: device inspection, and e-mail Jen M re: same.	0.3	\$500.00	\$150.00
9/30/2021	Walter Smith	Emails with co counsel re discovery.	0.1	\$500.00	\$50.00
10/1/2021	Walter Smith	Emails with co counsel re signature for rog responses from client.	0.2	\$500.00	\$100.00
10/4/2021	Walter Smith	Legal research and prepare memorandum on evidence topics; e-mail to case team re same. Emails with co counsel re: [REDACTED]	2.2	\$500.00	\$1,100.00
10/7/2021	Walter Smith	[REDACTED]	0.2	\$500.00	\$100.00
10/8/2021	Walter Smith	Review and comments on draft brief re mtn to change class def'n. Send to co counsel.	0.4	\$500.00	\$200.00
10/11/2021	Walter Smith	E-mails from OC about device inspection protocol draft; with co counsel re same.	0.1	\$500.00	\$50.00
10/12/2021	Walter Smith	Emails with client, co counsel re: device inspection protocol draft and proposed edits.	1	\$500.00	\$500.00
10/12/2021	Walter Smith	Call with client; talk about [REDACTED].	0.4	\$500.00	\$200.00
10/13/2021	Walter Smith	Emails with co counsel, OC re device inspection protocol agreement.	0.2	\$500.00	\$100.00
10/14/2021	Walter Smith	Emails with client, Vestige, J Murray re: [REDACTED]	1.2	\$500.00	\$600.00
10/14/2021	Walter Smith	Client phone call re [REDACTED]	0.4	\$500.00	\$200.00
10/15/2021	Walter Smith	Email verification page for discovery responses to OC.	0.1	\$500.00	\$50.00
10/18/2021	Walter Smith	Emails with device inspection company, client re: device inspection.	0.4	\$500.00	\$200.00
10/22/2021	Walter Smith	Co-counsel emails about device inspection protocol. Write to client re same.	0.3	\$500.00	\$150.00
10/22/2021	Walter Smith	Lunch meeting with client; discuss device inspection, etc.	1	\$500.00	\$500.00
11/2/2021	Walter Smith	E-mails with co counsel re case schedule changes, device inspection progress. E-mails with co-counsel about [REDACTED]	0.2	\$500.00	\$100.00
11/3/2021	Walter Smith	[REDACTED]	0.2	\$500.00	\$100.00
11/3/2021	Walter Smith	Review and analyze court ruling on motion to change class certification / decertify / approve notice plan / etc.	0.3	\$500.00	\$150.00
11/4/2021	Walter Smith	Emails with co counsel about [REDACTED].	0.2	\$500.00	\$100.00
11/5/2021	Walter Smith	Emails with co counsel re: our phone call for Tuesday to plan for next steps in this case.	0.2	\$500.00	\$100.00
11/8/2021	Walter Smith	Emails with J Murray, client re: [REDACTED].	0.3	\$500.00	\$150.00
11/8/2021	Walter Smith	Review and analyze produced information from device inspection.	0.3	\$500.00	\$150.00
11/9/2021	Walter Smith	E-mails with client, J Murray re: [REDACTED]	0.3	\$500.00	\$150.00
11/9/2021	Walter Smith	TC with client about [REDACTED].	0.4	\$500.00	\$200.00
11/9/2021	Walter Smith	TC with J Murray. [REDACTED]	0.3	\$500.00	\$150.00
11/9/2021	Walter Smith	Telephone conference with litigation team regarding plan to file a renewed class certification motion. E-mails with co-counsel, OC about case schedule, client can do trial late Sept 2022; discovery topics and device	1.3	\$500.00	\$650.00
11/10/2021	Walter Smith	inspection protocol.	0.6	\$500.00	\$300.00
11/10/2021	Walter Smith	Emails with client about [REDACTED] TC with client. [REDACTED]	0.2	\$500.00	\$100.00
11/11/2021	Walter Smith	[REDACTED]	0.8	\$500.00	\$400.00
11/11/2021	Walter Smith	E-mails between OC, J Murray re: phone call about remaining case schedule plan.	0.2	\$500.00	\$100.00

Date	Timekeeper	Narrative	Units	Rate	Value
11/12/2021	Walter Smith	E-mails with co-counsel about [REDACTED]	0.4	\$500.00	\$200.00
11/15/2021	Walter Smith	E-mails with J Murray, client re: [REDACTED]	0.3	\$500.00	\$150.00
11/16/2021	Walter Smith	TC with case team. Talk through PillPack's issues with device inspection protocol, strategy re: old phone of client.	0.7	\$500.00	\$350.00
11/16/2021	Walter Smith	Emails with client [REDACTED]	0.1	\$500.00	\$50.00
11/16/2021	Walter Smith	With Greg Kelley at Vestige, go over imaging and searches plan for 'old' phone.	0.1	\$500.00	\$50.00
11/17/2021	Walter Smith	E-mails with case team re: completing device inspection (including Vestige); e-mails with OC re edits to proposed changes to remaining case schedule.	0.4	\$500.00	\$200.00
11/17/2021	Walter Smith	Lunch with A Williams; [REDACTED].	0.8	\$500.00	\$400.00
11/18/2021	Walter Smith	Emails with co-counsel re: finishing the device inspection, with Vestige re same, with OC re their take on the device inspection; texts with client to supply info needed for above.	0.6	\$500.00	\$300.00
11/19/2021	Walter Smith	TC with counsel and follow up discussion with J Murray re: device inspection protocol.	0.5	\$500.00	\$250.00
11/19/2021	Walter Smith	Emails about today's discovery conference with J Murray, I email client re [REDACTED]	0.2	\$500.00	\$100.00
11/20/2021	Walter Smith	E-mails with client, J Murray re: [REDACTED].	0.1	\$500.00	\$50.00
11/21/2021	Walter Smith	Prepare and share with client [REDACTED]	1.9	\$500.00	\$950.00
11/21/2021	Walter Smith	TCs with B Chandler (2 calls) and client A Williams to discuss [REDACTED]	1.2	\$500.00	\$600.00
11/22/2021	Walter Smith	E-mails with co counsel re call today and review OC email about device inspection; e-mails with Vestige about whereabouts of client's phone.	0.2	\$500.00	\$100.00
12/6/2021	Walter Smith	Emails with client, co counsel re device inspection report.	0.4	\$500.00	\$200.00
12/7/2021	Walter Smith	Emails about edits to draft expert report with client, co counsel.	0.5	\$500.00	\$250.00
12/8/2021	Walter Smith	E-mails with client, co-counsel re [REDACTED]	0.5	\$500.00	\$250.00
12/9/2021	Walter Smith	E-mails with co-counsel and client re: expert report about device inspection.	1.3	\$500.00	\$650.00
12/9/2021	Walter Smith	TCs with client [REDACTED]	0.4	\$500.00	\$200.00
12/10/2021	Walter Smith	Co-counsel produce Vestige report to OC; review emails.	0.1	\$500.00	\$50.00
12/17/2021	Walter Smith	With co counsel re: plan to deal with latest discovery questions from PillPack.	1	\$500.00	\$500.00
12/17/2021	Walter Smith	Emails and texts with client, co counsel re latest PillPack discovery conference process.	0.7	\$500.00	\$350.00
12/18/2021	Walter Smith	Emails with co counsel, client about [REDACTED]	0.2	\$500.00	\$100.00
12/20/2021	Walter Smith	Call with client, J Murray, B Chandler re device inspection protective order motion / response to motion to compel.	1	\$500.00	\$500.00
12/21/2021	Walter Smith	Emails with co counsel to [REDACTED]. Send to client, and response from client.	1.2	\$500.00	\$600.00
12/23/2021	Walter Smith	E-mails with co-counsel re [REDACTED]; TC with J Murray re: same.	0.5	\$500.00	\$250.00
12/27/2021	Walter Smith	Emails with case team re: draft messages for OC, client; edits to same. Communications about [REDACTED]	0.5	\$500.00	\$250.00
12/27/2021	Walter Smith	Prep for and hold TC with co counsel about discovery dispute over device inspection. Notes to file.	0.5	\$500.00	\$250.00
12/27/2021	Walter Smith	Review case file. Locate documents needed for [REDACTED].	0.7	\$500.00	\$350.00
12/28/2021	Walter Smith	With client, B Terrell, J Murray re: [REDACTED].	1	\$500.00	\$500.00
12/28/2021	Walter Smith	TC with consulting expert re: [REDACTED].	0.7	\$500.00	\$350.00
12/28/2021	Walter Smith	Emails with case team re: [REDACTED]	0.2	\$500.00	\$100.00
12/28/2021	Walter Smith	Emails among co counsel, client re [REDACTED].	0.8	\$500.00	\$400.00
12/28/2021	Walter Smith	Prep for and attend TC with counsel about [REDACTED]; TC with client re [REDACTED].	1.1	\$500.00	\$550.00
12/29/2021	Walter Smith	Emails among co counsel, client about [REDACTED].	1	\$500.00	\$500.00
1/3/2022	Walter Smith	Emails among co counsel about [REDACTED].	0.5	\$500.00	\$250.00
1/4/2022	Walter Smith	Emails with co counsel about client communication on [REDACTED].	0.2	\$500.00	\$100.00
1/5/2022	Walter Smith	Emails among co counsel, client re: [REDACTED].	0.3	\$500.00	\$150.00
1/7/2022	Walter Smith	J Murray message sending PO motion. Respond to same.	0.1	\$500.00	\$50.00

Date	Timekeeper	Narrative	Units	Rate	Value
1/10/2022	Walter Smith	Emails with co counsel about draft motion for PO and review/edits to same; about client communications concerning [REDACTED]	1.2	\$500.00	\$600.00
1/11/2022	Walter Smith	Emails with co counsel, client about [REDACTED]	0.4	\$500.00	\$200.00
1/24/2022	Walter Smith	Emails with co counsel about [REDACTED]	0.1	\$500.00	\$50.00
2/2/2022	Walter Smith	Texts, call with client re Vestige device inspection.	0.3	\$500.00	\$150.00
2/2/2022	Walter Smith	TC with Greg at Vestige about data topics and retention. Emails, TC with co counsel about plan.	0.8	\$500.00	\$400.00
2/3/2022	Walter Smith	Email to co counsel re: [REDACTED]	0.1	\$500.00	\$50.00
2/7/2022	Walter Smith	Court orders deadlines for briefing on class cert motion. Update calendar.	0.1	\$500.00	\$50.00
2/18/2022	Walter Smith	Lunch with client [REDACTED]	1	\$500.00	\$500.00
2/25/2022	Walter Smith	Supplemental expert report of Jennifer Smith provided by OC.	0.1	\$500.00	\$50.00
3/8/2022	Walter Smith	Emails with co counsel about rebuttal expert report.	0.1	\$500.00	\$50.00
3/11/2022	Walter Smith	Emails among co counsel about objections to subpoena to expert Jeff H.	0.1	\$500.00	\$50.00
3/14/2022	Walter Smith	Emails among OC, co counsel about expert report of Jeff Hansen.	0.1	\$500.00	\$50.00
4/21/2022	Walter Smith	Review and comment on draft class cert motion. E-mails with co counsel and client re same.	0.8	\$500.00	\$400.00
5/19/2022	Walter Smith	Review proposed class cert filing details from defendant. E-mails with co counsel re: potential issues with confidentiality, etc.	0.5	\$500.00	\$250.00
6/2/2022	Walter Smith	Review and e-mails with co-counsel re: brief on class cert reply. E-mails with client re: same.	0.6	\$500.00	\$300.00
7/11/2022	Walter Smith	Review and e-mail to counsel about brief on SJ opposition.	0.5	\$500.00	\$250.00
12/5/2022	Walter Smith	Read court order denying defendant's SJM.	0.5	\$500.00	\$250.00
12/5/2022	Walter Smith	Emails with co counsel about SJM denial order today.	0.1	\$500.00	\$50.00
12/23/2022	Walter Smith	Read order on class cert motion.	0.4	\$500.00	\$200.00
12/23/2022	Walter Smith	E-mails with co counsel about class cert order today.	0.2	\$500.00	\$100.00
12/27/2022	Walter Smith	E-mails with co counsel and client re: class cert order.	0.1	\$500.00	\$50.00
12/28/2022	Walter Smith	E-mail co counsel confirming re class cert order.	0.1	\$500.00	\$50.00
1/10/2023	Walter Smith	Emails among co-counsel and OC re: today's meet and confer about the notice plan, trial schedule.	0.1	\$500.00	\$50.00
1/10/2023	Walter Smith	Meet and confer with OC, co counsel about notice plan, case schedule.	0.5	\$500.00	\$250.00
1/13/2023	Walter Smith	OC email re follow up topics from recent meet and confer about notice plan, case schedule.	0.1	\$500.00	\$50.00
1/17/2023	Walter Smith	Emails with client, co counsel about [REDACTED]	0.2	\$500.00	\$100.00
1/18/2023	Walter Smith	Client emails re [REDACTED]	0.1	\$500.00	\$50.00
1/19/2023	Walter Smith	Email to client re [REDACTED]	0.1	\$500.00	\$50.00
1/20/2023	Walter Smith	Emails with co counsel J Murray, client to set call today for case updates.	0.1	\$500.00	\$50.00
1/20/2023	Walter Smith	OC email listing topics with expected updates from us (notice plan, trial dates, etc.).	0.1	\$500.00	\$50.00
1/24/2023	Walter Smith	With client A Williams and J Murray. [REDACTED]	0.6	\$500.00	\$300.00
1/30/2023	Walter Smith	OC provides draft JSR/proposed case schedule; review same. Emails with co counsel about proposed timeline for case.	0.3	\$500.00	\$150.00
1/31/2023	Walter Smith	Emails with client, co-counsel about trial schedule [.2]; emails between OC and co counsel about JSR[.1].	0.2	\$500.00	\$100.00
2/2/2023	Walter Smith	ECF notices of document filing today. Update case file.	0.2	\$500.00	\$100.00
2/2/2023	Walter Smith	OC, co-counsel emails about JSR draft.	0.1	\$500.00	\$50.00
2/7/2023	Walter Smith	ECF notice re: scheduling conference coming up.	0.1	\$500.00	\$50.00
2/22/2023	Walter Smith	Co-counsel emails about today's conference on the trial schedule.	0.2	\$500.00	\$100.00
2/22/2023	Walter Smith	Update calendar to reflect case deadlines. Review and analyze correspondence from co-counsel, opposing counsel.	0.4	\$500.00	\$200.00
2/23/2023	Walter Smith	Co-counsel and court emails about JSR; ECF notice re: case schedule and save to file.	0.2	\$500.00	\$100.00
3/20/2023	Walter Smith	Emails about notice plan following court order today.	0.2	\$500.00	\$100.00
3/20/2023	Walter Smith	ECF notice and order on notice plan. Review and save to file.	0.2	\$500.00	\$100.00
3/23/2023	Walter Smith	Email to client re: trial date, ask to block out on calendar.	0.1	\$500.00	\$50.00
3/24/2023	Walter Smith	Emails among co-counsel and notice plan admin. re: data to complete notice.	0.1	\$500.00	\$50.00
3/28/2023	Walter Smith	ECF notice of W/D for defense counsel.	0.1	\$500.00	\$50.00
4/3/2023	Walter Smith	Review co-counsel emails re: plan to serve subpoenas [REDACTED]	0.1	\$500.00	\$50.00

Date	Timekeeper	Narrative	Units	Rate	Value
4/5/2023	Walter Smith	E-mail communications among co-counsel and OC about notice plan, subpoenas for TC records to complete same; OC letter about discovery and review same.	0.4	\$500.00	\$200.00
4/6/2023	Walter Smith	Emails among litigation team and with OC about extension of time to complete notice plan per class cert order. Save copy of ECF filings.	0.3	\$500.00	\$150.00
4/10/2023	Walter Smith	OC email about notice plan, etc.	0.1	\$500.00	\$50.00
4/11/2023	Walter Smith	Group e-mails about [REDACTED]	0.3	\$500.00	\$150.00
4/13/2023	Walter Smith	Co-counsel e-mail messages about notice plan, subpoena details.	0.1	\$500.00	\$50.00
4/13/2023	Walter Smith	New notice of appearance from OC.	0.1	\$500.00	\$50.00
4/14/2023	Walter Smith	ECF notice re: filing of reply ISO mtn for xtn on notice plan.	0.1	\$500.00	\$50.00
4/14/2023	Walter Smith	Co-counsel e-mail with draft motion to extend notice plan. Review and follow up.	0.3	\$500.00	\$150.00
4/14/2023	Walter Smith	Review and save to file copies of OC response to mtn on notice plan d/l's.	0.2	\$500.00	\$100.00
4/17/2023	Walter Smith	Review email from opposing counsel about notice plan.	0.1	\$500.00	\$50.00
4/20/2023	Walter Smith	Court order re: trial schedule. Save to file.	0.1	\$500.00	\$50.00
4/20/2023	Walter Smith	Download subpoena documents to file (provided by co-counsel).	0.1	\$500.00	\$50.00
4/26/2023	Walter Smith	Emails between co-counsel, OC about confidentiality objections concerning subpoena for phone records, etc.	0.3	\$500.00	\$150.00
4/27/2023	Walter Smith	OC email re: confidential designations dispute, subpoena requests concerning calling data.	0.1	\$500.00	\$50.00
5/2/2023	Walter Smith	Client emails re trial date for July 2024.	0.1	\$500.00	\$50.00
5/3/2023	Walter Smith	Email from OC about subpoena requests for phone call data; resolution of concerns.	0.1	\$500.00	\$50.00
5/11/2023	Walter Smith	Review correspondence between OC, co-counsel about resolution of defendant's concerns about protective order, confidential designations, subpoenas for phone records.	0.1	\$500.00	\$50.00
5/17/2023	Walter Smith	Client email confirming trial date; OC e-mail re: date for doc production from PillPack.	0.1	\$500.00	\$50.00
5/18/2023	Walter Smith	Review co-counsel messages attaching subpoena enforcement action information.	0.1	\$500.00	\$50.00
5/22/2023	Walter Smith	Retrieve and save latest subpoena docs produced by co-counsel.	0.2	\$500.00	\$100.00
5/25/2023	Walter Smith	ECF notices re: filing of motion to enforce subpoena / co-counsel. Save to file. Co-counsel correspondence with OC re: subpoena to T-Mobile.	0.2	\$500.00	\$100.00
6/1/2023	Walter Smith	Retrieve and save latest (5/26) subpoena document production from TMDW.	0.1	\$500.00	\$50.00
7/28/2023	Walter Smith	Email with case team re plan to talk about notice plan with Epiq.	0.1	\$500.00	\$50.00
8/1/2023	Walter Smith	Review and respond re: draft email text for PP counsel communications.	0.1	\$500.00	\$50.00
8/2/2023	Walter Smith	TC with Epiq, co counsel to verify points about the notice plan.	0.8	\$500.00	\$400.00
8/23/2023	Walter Smith	Review draft motion re discovery from B Chandler. Email back to confirm approval.	0.3	\$500.00	\$150.00
8/29/2023	Walter Smith	Rule out existence of any additional documents to produce re discovery responses for correspondence with Epiq.	0.6	\$500.00	\$300.00
8/29/2023	Walter Smith	Email client re court's case schedule order.	0.1	\$500.00	\$50.00
9/1/2023	Walter Smith	Client email re case schedule.	0.1	\$500.00	\$50.00
9/13/2023	Walter Smith	Review draft response re protective order mtn and e-mail to B Chandler re: my approval.	0.3	\$500.00	\$150.00
9/28/2023	Walter Smith	Email to B Chandler re strategy for discovery motion.	0.1	\$500.00	\$50.00
10/4/2023	Walter Smith	Emails with client, J Murray re: [REDACTED]	0.3	\$500.00	\$150.00
10/4/2023	Walter Smith	Videoconference with co counsel to help Ms. Chandler prepare for oral argument on motion to compel.	1	\$500.00	\$500.00
10/5/2023	Walter Smith	Email to co counsel re: court's ruling on discovery motion.	0.1	\$500.00	\$50.00
10/5/2023	Walter Smith	Attended oral argument on discovery motion.	0.5	\$500.00	\$250.00
1/11/2024	Walter Smith	TC with lit team regarding trial strategy.	0.5	\$500.00	\$250.00
1/17/2024	Walter Smith	Review draft and e-mail to case team re: draft letter to OC about discovery. No edits to suggest.	0.1	\$500.00	\$50.00
2/7/2024	Walter Smith	Email to case team [REDACTED]	0.1	\$500.00	\$50.00
2/8/2024	Walter Smith	E-mails to co-counsel to discuss plan to set up a call with client to discuss case schedule, trial plan, etc.; plan for trial to-do list.	0.1	\$500.00	\$50.00
2/9/2024	Walter Smith	Meeting with lit team to discuss discovery, remaining case schedule, ID of add'l class members, etc. Zoom discussion.	0.8	\$500.00	\$400.00
3/29/2024	Walter Smith	Email client re update on mediation in downtown LA.	0.1	\$500.00	\$50.00

Date	Timekeeper	Narrative	Units	Rate	Value
5/20/2024	Walter Smith	Email to co counsel about mediation plan, preparation, etc.	0.1	\$500.00	\$50.00
5/21/2024	Walter Smith	Emails with co counsel about mediation and prep.	0.2	\$500.00	\$100.00
5/21/2024	Walter Smith	Emails with client A Williams re mediation prep.	0.1	\$500.00	\$50.00
5/23/2024	Walter Smith	Emails with co counsel about Zoom call with A Williams for mediation prep.	0.2	\$500.00	\$100.00
5/25/2024	Walter Smith	Review draft mediation letter. Edits and comments on same and e-mails with co counsel re: same.	0.5	\$500.00	\$250.00
5/28/2024	Walter Smith	Assisted co-counsel with mediation preparation.	0.5	\$500.00	\$250.00
6/6/2024	Walter Smith	SED email re mediation outcome.	0.1	\$500.00	\$50.00
6/8/2024	Walter Smith	Texts with client re case progress.	0.2	\$500.00	\$100.00
6/8/2024	Walter Smith	Relay mediation info from client to SED.	0.2	\$500.00	\$100.00
6/10/2024	Walter Smith	Emails with case team re: case progress.	0.1	\$500.00	\$50.00
11/12/2024	Walter Smith	Attention to motion for settlement approval. Emails with Jennifer Murray re: same.	1.4	\$500.00	\$700.00
11/19/2024	Walter Smith	Attention to materials for motion for approval of fees, costs, and service award and e-mail to client.	0.2	\$500.00	\$100.00
11/19/2024	Walter Smith	Attention to motion for fee approval. Emails with Jennifer Murray re: same.	2.1	\$500.00	\$1,050.00
<b>Statement Professional: Walter Smith</b>			<b>445.7</b>		<b>\$222,850.00</b>
<b>Total</b>			<b>521.9</b>		<b>\$272,380.00</b>