

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

TIFFANY HILL and MICHELLE ANDERSON,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

CONTINUUM GLOBAL SOLUTIONS, LLC, a
Delaware Limited Liability Company, XEROX
BUSINESS SERVICES, LLC, a Delaware Limited
Liability Company, LIVEBRIDGE, INC., an
Oregon Corporation, AFFILIATED COMPUTER
SERVICES, INC., a Delaware Corporation,
AFFILIATED COMPUTER SERVICES, LLC, a
Delaware Limited Liability Company,

Defendants.

NO. 2:12-cv-00717-JCC

**DECLARATION OF TOBY J. MARSHALL IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND CLASS
REPRESENTATIVE AWARDS**

I, Toby J. Marshall, declare as follows:

A. Background and experience.

1. I am a member of the law firm of Terrell Marshall Law Group PLLC, counsel of record for plaintiff in this matter. I am admitted to practice before this Court and am a member in good standing of the bar of the state of Washington. I respectfully submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Class Representative Awards.

DECLARATION OF TOBY J. MARSHALL IN SUPPORT OF
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE AWARDS - 1

Case No. 2:12-cv-00717-JCC

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1 Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration
2 and could testify competently to them if called upon to do so.

3 2. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex
4 civil and commercial litigation with an emphasis on consumer protection, product defect, civil
5 rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel
6 representing multi-state and nationwide classes in state and federal court in Washington and
7 throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have
8 represented scores of classes, tried class actions in state and federal court, and obtained
9 hundreds of millions of dollars in monetary relief to workers, consumers, and other individuals.

10 3. I am a founding member of Terrell Marshall who represents clients in a wide
11 variety of class actions and other complex litigation, including wage and hour, product defect,
12 civil rights, and consumer protection cases. I have served as co-lead counsel in numerous class
13 and collective actions and have tried and won individual and class cases in state and federal
14 court. I have also argued several times before the Washington Supreme Court, the Washington
15 Court of Appeals, and the Ninth Circuit Court of Appeals. In 2002, I received my J.D. from the
16 University of Washington School of Law, where I served on the Moot Court Honor Board and
17 was selected to the Order of Barristers. Before forming Terrell Marshall, I was a member of
18 Tousley Brain Stephens PLLC. I have presented at many seminars on employment and class
19 action issues. I am a member of the Washington Employment Lawyers Association (WELA) and
20 serve on WELA's amicus and legislative committees. I also am a member of the Washington
21 State Association for Justice. I have been named several times to the Washington Super
22 Lawyers list.

23 **B. Qualifications of other Terrell Marshall attorneys.**

24 4. Jennifer Rust Murray is a founding member of Terrell Marshall who practices
25 complex litigation, including the prosecution of consumer and wage and hour class actions. In
26 2005, Ms. Murray received her J.D. from the University of Washington School of Law where she
27

1 was a member of the Washington Law Review. Ms. Murray's law review article entitled
2 "Proving Cause in Fact under Washington's Consumer Protection Act: The Case for a Rebuttable
3 Presumption of Reliance" won the Carkeek prize for best submission by a student author.
4 Before law school, Ms. Murray earned a Ph.D. in Philosophy from Emory University. Ms. Murray
5 has been an active member of the Washington State Bar Association since her admission to the
6 bar in 2005. She was admitted to the Oregon State Bar in 2010. Ms. Murray currently is vice-
7 president of the board of Washington's Unemployment Law Project and is a Washington State
8 Association for Justice Eagle member. She regularly presents at legal conferences on consumer
9 issues.

10 5. Amanda M. Steiner became a member of Terrell Marshall in 2015. She practices
11 complex litigation, including the prosecution of consumer, defective product, wage and hour,
12 and civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in
13 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that
14 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex
15 securities, antitrust, consumer and civil rights class action in federal and state courts
16 throughout the United States. Ms. Steiner was selected for inclusion in the annual Northern
17 California "Super Lawyers" list and was named to the Top 50 Women Lawyers of Northern
18 California. She is a Fellow of the American Bar Foundation.

19 6. Blythe H. Chandler joined Terrell Marshall in 2014 and became a member in
20 2018. Ms. Chandler practices complex litigation with a focus on prosecution of consumer class
21 actions. She has been appointed class counsel in cases challenging a wide range of unfair or
22 deceptive practices, including debt collection practices. In 2010, she received her J.D. from the
23 University of Washington School of Law with high honors, Order of the Coif. Ms. Chandler
24 served as Chief Articles Editor for the Washington Law Review. Before joining Terrell Marshall,
25 Ms. Chandler served as a law clerk to the Honorable Betty B. Fletcher, Senior United States
26 Circuit Judge for the Ninth Circuit Court of Appeals, and to the Honorable John C. Coughenour,
27 Senior United States District Judge for the Western District of Washington. Ms. Chandler also

served as a judicial extern to the Honorable Robert S. Lasnik, United States District Judge for the Western District of Washington. Ms. Chandler co-authored chapters of the Consumer Protection Deskbook published by the Washington State Association for Justice (WSAJ) and has spoken on topics including use of experts and personal jurisdiction in class actions. Ms. Chandler is a member of the Public Justice Foundation Board of Directors, is a Co-Coordinator of the Washington Employment Lawyers Association Amicus Committee and currently co-chairs WSJA's Consumer Protection Section. She was named to the 2020 Rising Star List by Washington Super Lawyers.

7. Elizabeth A. Adams joined Terrell Marshall in 2015 and became a member of Terrell Marshall in 2022. Ms. Adams concentrates her practice in complex litigation, including the prosecution of consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams received her J.D. from the UCLA School of Law, where she received the Order of the Coif and served as a Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms. Adams served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu, and the Honorable John A. Kronstadt, all of the United States District Court for the Central District of California. Ms. Adams is a member of the Washington Employment Lawyers Association, Washington State Association for Justice Eagle member, Public Justice Student Civil Rights Committee, and a member of the Eastern District of Washington Local Civil Rules Committee for 2024.

8. Marc Cote is a former member of Terrell Marshall. He graduated from the University of Washington School of Law with high honors in 2007. He served as a law clerk to the Honorable Walter L. Carpeneti of the Alaska Supreme Court. He concentrated his practice on employment law while at Terrell Marshall and subsequently as a partner with Frank Freed Subit & Thomas LLP. Mr. Cote now serves as a full-time mediator with Cote Law & Mediation PLLC.

9. Erika Lane (previously Nusser) is a former member of Terrell Marshall. She joined the firm in 2008 and was a member from 2018 to 2023. Ms. Lane practiced complex litigation,

1 including the prosecution of consumer, wage and hour, and civil rights class actions. She has
 2 served as co-lead counsel on numerous multi-state and nationwide class actions. Ms. Lane
 3 received her J.D. from the University of San Francisco School of Law in 2008. She co-authored
 4 the chapter on discovery in the National Consumer Law Center's Class Action Manual. She also
 5 co-edited and wrote several chapters of the Consumer Protection Deskbook published by the
 6 Washington State Association for Justice. Ms. Lane is the current co-chair of the interpersonal
 7 violence section of the Washington State Association for Justice and has previously served as
 8 the co-chair of the employment law section. Ms. Lane has been repeatedly named to the
 9 annual Rising Star List (2013 – 2019) by Washington Super Lawyers.

10 10. Samuel J. Strauss is a former associate at Terrell Marshall. Mr. Strauss graduated
 11 from the University of Washington School of Law with honors in 2013. At Terrell Marshall he
 12 concentrated his practice on consumer class actions. Mr. Strauss is now a founding member of
 13 Strauss Borelli PLLC in Madison, Wisconsin.

14 11. Jennifer Boschen is a senior paralegal at Terrell Marshall, and she has worked at
 15 the firm since its inception in 2008. Ms. Boschen has 23 years of paralegal experience. She is
 16 qualified to perform substantive legal work based on her training and experience. She was also
 17 an integral part of the team that investigated and prosecuted the *Wilbur v. City of Mount*
 18 *Vernon* litigation, performing indispensable work throughout the case and at trial. Ms. Boschen
 19 was also the paralegal in *Lummi Nation v. Cooke Aquaculture Pacific, LLC*, King County Case No.
 20 20-2-12869-4 SEA, which was tried via Zoom over three weeks in May and June of 2022. The
 21 trial resulted in a jury verdict for Terrell Marshall's client the Lummi Nation. Ms. Boschen
 22 supported all aspects of the trial attorneys' work in this matter, including by establishing and
 23 maintaining the technology for the remote trial. She also had primary responsibility for
 24 preparing deposition transcripts and exhibits and presenting them electronically to jurors, as
 25 well as managing admitted exhibits, including in the Court's sharefile system.

26 12. Jodi Nuss has been a Senior Paralegal at Terrell Marshall since 2018. She has a
 27 B.A. from the University of Massachusetts and an AAS in Paralegal Studies from Baton Rouge

Community College. Ms. Nuss has worked in the legal field since 2010 and has served as paralegal on five trials. Ms. Nuss also has extensive experience with sophisticated data analysis using software and programming languages including Alteryx, Excel, and Python.

13. Eden Nordby was a Senior Paralegal at Terrell Marshall from the time the firm opened in 2008 until starting law school in 2018. She is now an associate at the firm.

C. Other cases litigated by Terrell Marshall.

14. Examples of wage and hour class and collective actions that Terrell Marshall is litigating or has litigated to successful completion include:

- a. *Barnett, et al. v. Wal-Mart Stores, Inc.*—Filed in 2001 on behalf of Washington employees who alleged wage and hour violations by the country’s largest private employer. Terrell Marshall obtained certification on behalf of the class of 90,000 current and former employees and was preparing for trial when the case settled. The King County Superior Court granted final approval of the \$35 million settlement on July 20, 2009.
- b. *Burnett v. Pagliacci Pizza, Inc.*—Filed in 2017 on behalf of pizza delivery drivers who alleged violations of state wage and hour laws. The Washington Supreme Court ruled that the drivers’ claims were not subject to mandatory arbitration. *Burnett v. Pagliacci Pizza, Inc.*, 196 Wash.2d 38, 470 P.3d 486 (2020). The King County Superior Court granted final approval of a \$3.785 million settlement on July 16, 2021.
- c. *Spencer v. FedEx Ground Package Sys., Inc.*—Filed in 2014 on behalf of delivery drivers who alleged violations of state wage and hour laws. The Superior Court of King County granted final approval of the \$10.5 million settlement on December 2, 2016.
- d. *Mendis v. Schneider Nat’l Carriers, Inc.*—Filed in 2014 on behalf of more than 1,200 truck drivers who alleged wage and hour violations, including failure to pay for rest breaks and overtime, and unlawful deductions from wages. The Western District of Washington granted final approval of the \$5.75 million settlement on November 13, 2018.

- e. *Lowry v. Ralph's Concrete Pumping, Inc.*—Filed in 2012 on behalf of 200 employees who alleged violations of Washington rest and meal break, minimum wage, and prevailing wage laws. The King County Superior Court granted final approval of the \$2.55 million settlement on December 10, 2018.
- f. *Rhode v. T-Mobile USA, Inc.*—Filed in 2015 on behalf of retail sales associates who alleged T-Mobile failed to properly and timely pay them all their earned commissions in violation of Washington law. The King County Superior Court granted final approval of the \$1.27 million settlement on May 24, 2019.
- g. *Helde v. Knight Transp., Inc.*—Filed in 2012 on behalf of truck drivers who alleged violations of wage and hour laws in Washington, including failure to pay for rest breaks and unlawful deductions from wages. The Western District of Washington granted final approval of the \$1.45 million settlement and separately awarded \$1.2 million in attorneys' fees and costs in October 2017.
- h. *Tolliver, et al. v. Avvo, Inc.*—Filed in 2016 on behalf of sales employees who alleged they were misclassified as overtime exempt. The King County Superior Court granted final approval of the \$1.75 million settlement on September 15, 2017.
- i. *Garrett v. The CJS Solutions Group, LLC*—Filed in 2017 on behalf of employees who alleged they had been misclassified as independent contractors and who were therefore not paid overtime compensation in violation of state and federal law. The Southern District of New York granted final approval of the \$3.24 million settlement on June 26, 2018.
- j. *Kariuki v. Pacific Bells, LLC*—Filed in 2017 on behalf of employees of several Taco Bell franchises who alleged they were not provided with proper rest and meal breaks, among other violations. The King County Superior Court granted final approval of the \$750,000 settlement on July 11, 2019.
- k. *Carranza v. Dovex Fruit Co.*—Filed in 2016 on behalf of migrant and seasonal farm workers who alleged their employer failed to pay for all hours worked. Terrell Marshall successfully litigated the claims, which resulted in an opinion by the Washington Supreme Court in *Carranza v. Dovex Fruit Company*, 190 Wn.2d 612 (2018). Following the Washington Supreme Court decision,

the Eastern District of Washington granted final approval of the \$1.22 million settlement on August 22, 2019.

- l. *Martinez v. Auvil Fruit Co.*—Filed in 2016 on behalf of more than 4,000 migrant and seasonal farm workers who alleged their employer failed to pay for all hours worked, including rest breaks, in violation of Washington law. The Eastern District of Washington granted final approval of the \$2.5 million settlement on October 10, 2018.
- m. *Paz v. Sakuma Brothers Farms, Inc.*—Filed in 2013 on behalf of almost 1,000 migrant and seasonal berry pickers who alleged violations of state wage and hour law and the federal Agricultural Worker Protection Act. The Western District of Washington approved two settlements totaling more than \$935,000 with a separate payment of attorneys’ fees and costs of more than \$239,000. The primary claims in the case settled for \$850,000 plus an agreement on injunctive relief, which the court approved in November 2014. Terrell Marshall successfully litigated additional claims not covered by the 2014 settlement, which resulted in a unanimous opinion by the Washington Supreme Court in *Lopez Demetrio v. Sakuma Brothers Farms, Inc.*, 183 Wn.2d 649 (2015). Following the Washington Supreme Court decision, the court approved a final settlement of all claims and ordered payment of plaintiffs’ attorneys’ fees and costs on July 8, 2016.
- n. *Witschel v. IMCO General Construction, Inc.*—Filed in 2013 on behalf of construction employees who alleged wage and hour violations. The Superior Court of Skagit County granted final approval of the \$1.1 million settlement on June 16, 2016.
- o. *McCracken v. Pacific Cargo Services, LLC*—Filed 2011 on behalf of truck drivers in Washington and Oregon who alleged wage and hour violations. The Superior Court of King County granted final approval of the \$475,000 settlement on August 25, 2017.
- p. *Ramirez v. Precision Drywall, Inc.*—Filed in 2008 on behalf of drywall workers who alleged wage and hour violations including rest and meal break and overtime violations. Terrell Marshall represented the class through a five-week jury trial and obtained a judgment for the workers in excess of \$4 million.

- 1 q. *Hudson v. Oatridge Security Group, Inc.*—Filed in 2018 on
2 behalf of private security officers who alleged wage and hour
3 violations including rest and meal break and overtime
4 violations. The King County Superior Court granted final
5 approval of the \$1.75 million settlement on April 9, 2021.
- 6 r. *Tschosik v. Diamond Freight Systems, Inc.*—Filed in 2016 on
7 behalf of Washington employees who alleged wage and hour
8 violations including rest and meal break, overtime, and off-the-
9 clock violations. The Spokane County Superior Court granted
10 final approval of the \$385,000 settlement on August 30, 2019.
- 11 s. *Ortiz v. Amazon.com, Inc.*—Filed in 2017 on behalf of nearly
12 3,000 Amazon delivery drivers who alleged violations of state
13 wage and hour law including rest and meal break, overtime,
14 and off-the-clock violations. The King County Superior Court
15 granted final approval of the \$8.2 million settlement on May 7,
16 2021.
- 17 t. *Chandler v. International Marine and Industrial Applicators,*
18 *LLC*—Filed in 2022 on behalf of welders who alleged overtime
19 violations. In June 2023, the Western District of Washington
20 granted final approval of a settlement of \$2.5 million.
- 21 u. *Freitas v. Heartland Express*—Filed in November 2019 on
22 behalf of truck drivers who alleged they were not paid for
23 sleeper berth time and failed to receive proper rest and meal
24 breaks. In July 2023, the San Bernardino County Superior
25 Court granted final approval of a settlement of \$10.25 million.
- 26 v. *Keller v. Yakima Valley Memorial Hospital Association, d/b/a*
27 *Virginia Mason Medical Center*—Filed in 2020 on behalf of
hospital employees who alleged they were not paid for time
spent donning and doffing surgical attire. In August 2022, the
Yakima County Superior Court granted final approval of a
settlement of \$500,000.
- w. *Kurtz v. RCCH Trios Health*—Filed in April 2019 on behalf of
healthcare workers who alleged they were not provided with
rest and meal breaks. In August 2024, the Eastern District of
Washington granted final approval of a settlement of \$4.4
million.

- 1 x. *Randall v. Integrated Communication Service, Inc.*—Filed in
2 July 2020 on behalf of cable installation technicians who
3 alleged they were not paid for all hours worked or reimbursed
4 for work-related expenses. In March 2024, the Western
5 District of Washington granted final approval of a settlement
6 of \$2.2 million.
- 7 y. *Sampson v. Knight Transportation*—Filed in October 2016 on
8 behalf of current and former drivers at Knight Transportation
9 who alleged wage and hour violations, including not receiving
10 pay for all hours work, unlawful deductions, and not receiving
11 all earned rest and meal breaks. In April 2023, the Western
12 District of Washington granted final approval of a settlement
13 of \$450,000

14 **D. The prosecution of this action.**

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

22 16. The work performed by paralegals and legal assistants was work that I or an
23 attorney would have had to perform absent such assistance. In the case of Jennifer Boschen,
24 Jodi Nuss, and Eden Nordby, the work required an understanding of the facts and claims at
25 issue in the case and was important to the development of those facts and claims. Indeed, Ms.
26 Boschen's work included extensive data analysis that was instrumental to calculate damages,
27 and Ms. Nuss's work included data analysis necessary to calculate settlement awards. Ms.
Nordby's work required an understanding of relevant legal rules and concepts. All of these staff
members are qualified to perform substantive legal work based on their training and past
experience working for attorneys.

17. A spreadsheet that compiles the contemporaneously maintained billing records of Terrell Marshall attorneys and staff is attached as **Exhibit 1**. We have reviewed these billing records and reduced and eliminated time where appropriate. We removed all time recorded for timekeepers with fewer than five hours in the case and all time for administrative work. In total, we reduced Terrell Marshall's time by over 100 hours. It is my firm belief that the remaining time billed was reasonably necessary to litigate this case and secure a settlement on behalf of Plaintiffs and the Class.

18. The following table identifies the attorneys and staff members from Terrell Marshall who worked on this case and for whom the recovery of fees is sought. For each of the timekeepers below I have stated the current hourly rate, the number of hours worked through September 25, 2025, and the total amount of fees. These time summaries are taken from the contemporaneous, daily time reports the firm prepares and maintains in the regular course of business.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
ATTORNEYS				
Toby J. Marshall Founding Member J.D. from Univ. of Washington School of Law, 2002	Managed all aspects of litigation, responsible for overall strategy, developed facts and legal claims, led discovery, briefing, expert work, settlement negotiations, argued motions and appeals.	\$675	1128.6	\$761,805.00
Jennifer Rust Murray Founding Member J.D. from Univ. of Washington School of Law, 2005	Assisted with appellate briefing.	\$650	11.9	\$7,735.00

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Amanda M. Steiner Member J.D. from UC Berkeley School of Law, 1997	Drafted motion for preliminary approval and worked on settlement administration.	\$650	52.2	\$33,930.00
Mark C. Cote Former Member J.D. from Univ. of Wash. School of Law, 2007	Investigated facts and drafted complaint, took depositions, worked on case strategy, discovery, early settlement negotiations, class certification, and summary judgment and appellate briefing.	\$625	1048.7	\$655,437.50
Elizabeth A. Adams Member J.D. from UCLA School of Law, 2012	Drafted response to motion to stay.	\$525	6.6	\$3,465.00
Erika Lane (ELN) Former Member Univ. of San Francisco School of Law, 2008	Defended class member depositions, assisted with briefing.	\$500	11.6	\$5,800.00
Beau Haynes Former Associate J.D. from Univ. of Wash. School of Law, 2011	Assisted with discovery responses and class certification.	\$450	5.8	\$2,610.00
Samuel J. Strauss Former Associate J.D. from Univ. of Wash. School of Law, 2013	Drafted class member declarations for class certification.	\$450	205.0	\$92,250.00
Eleanor Eagan Former Law Clerk (now associate with the firm)	Legal research regarding damages theories.	\$200	21.2	\$4,240.00
Shira Zucker Former Law Clerk	Drafted motion to seal.	\$150	11.8	\$1,770.00

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Case No. 2:12-cv-00717-JCC

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NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Jennifer Boschen Senior Paralegal 24 years legal experience	Worked on ESI and other discovery matters, analyzed class member data for damages calculations.	\$250	129.6	\$32,400.00
Eden B. Nordby Former Senior Paralegal 16 years legal experience	Communicated with Ms. Hill and class members, worked on discovery and document review, drafted class member declarations.	\$250	203.6	\$50,900.00
Jodi Nuss Senior Paralegal 11 years legal experience	Communicated with class members, analyzed data relating to settlement administration.	\$250	13.1	\$3,275.00
Holly Rota Legal Assistant 20 years legal experience	Assisted with discovery, motions, and appeals.	\$200	18.6	\$3,720.00
Bradford Kinsey Former Legal Assistant 28 years legal experience	Assisted with discovery, motions, and appeals.	\$200	35.2	\$7,040.00
Christine L. Stanley Former Legal Assistant	Worked on class member declarations in support of class certification.	\$200	24.7	\$4,940.00
Janelle E. Chase Former Legal Assistant	Drafted class member declarations.	\$150	11.5	\$1,725.00
China E. Davis Former Legal Assistant	Responded to class member inquiries following certification notice.	\$150	20.8	\$3,120.00
Hannah Buckendorf Former Legal Assistant	Communicated with Ms. Hill and class members, drafted class member declarations.	\$150	21.9	\$3,285.00

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CLASS REPRESENTATIVE AWARDS - 13

Case No. 2:12-cv-00717-JCC

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NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
TOTAL			2982.4	\$1,679,447.50

19. The firm will incur additional fees in relation to the final approval and settlement administration process. Terrell Marshall estimates it will incur an additional \$45,000 in fees to prosecute this case through final settlement approval.

20. The lodestar calculations are based on reasonable hourly rates. Terrell Marshall counsel sets rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets where legal services are typically performed; and the experience, reputation and ability of the attorneys and staff members.

21. Terrell Marshall has incurred out-of-pocket litigation expenses totaling \$64,258.44, primarily to cover expenses related to expert work, legal research, deposition and hearing transcripts, mediation fees, filing fees, and administrative costs such as copying, mailing, and process service expenses. The following chart summarizes Terrell Marshall's litigation costs:

Category of Expense	Total
Courier/Process Server	636.95
Court Reporter Fees	868.75
Electronic Production/Data Hosting	1,083.71
Expert Costs	39,067.50
Fax	26.97
FedEx	59.28
Filing Fees	350.00

Category of Expense	Total
Meals	248.14
Mediation	1,197.00
Mileage	201.96
Online Research	5,563.66
Parking/Tolls	285.26
Photocopies/Reproductions	5,849.74
Postage	43.19
Transcripts	8,776.33
TOTAL	64,258.44

E. Estimated payments to members of the Settlement Classes

22. Xerox will pay \$9.1 million to resolve this litigation, which equals 202% of the total potential damages for both Settlement Classes or 100% of the total damages plus 66% of the prejudgment interest accrued over 13 years.

23. If the Court awards the requested attorneys' fees (\$3,185,000), expenses (\$81,759.41), settlement administration costs (\$34,500), and class representative awards (\$18,000), the remainder will be \$5,780,740.59. Class counsel estimate that the employer-side taxes due on that amount total \$131,222.81. When those are subtracted, the remainder is \$5,649,517.78.

24. The First Settlement Class will recover \$5,084,566, which is 165% of its total estimated damages or 100% of its estimated damages plus 42% of the prejudgment interest accrued over 13 years.

25. The Second Settlement Class, which had all of its claims dismissed, will recover \$564,952, which is 40% of its total damages and 16% of its damages plus interest; however, if a risk deduction of 75% is applied (meaning a 25% chance of reversing the Court's res judicata

1 ruling on appeal), the Second Settlement Class will recover 158% of its reduced damages or
2 100% of its reduced damages plus 38% of the prejudgment interest accrued on those reduced
3 damages over 13 years.

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

6 EXECUTED this 13th day of October, 2025.

7 By: /s/ Toby J. Marshall, WSBA #32726
8 Toby J. Marshall, WSBA #32726
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- Exhibit A -

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/12/2012	MCC	Researched related cases against ACS and company information [.8]; drafted case synopsis of related case filed in 2008 [.6]; email correspondence relating to case against ACS [.1].	1.5	\$ 625.00	\$ 937.50		
4/12/2012	TJM	Telephone call from co-counsel regarding factual background issues [.2]; researched same [.2]; opened case and ran conflict check [.2].	0.6	\$ 675.00	\$ 405.00		
4/13/2012	MCC	Researched related cases and company information in preparation for meeting with Ms. Hill [.5]; conference with Mr. Marshall in preparation for meeting [.1]; meeting with Ms. Hill [1.5]; continued researching and investigating related cases against ACS [1.3].	3.4	\$ 625.00	\$ 2,125.00		
4/13/2012	TJM	Prepared for meeting with client and analyzed issues regarding factual background [.3]; meeting with client and co-counsel regarding factual background and case strategy issues [2.2].	2.5	\$ 675.00	\$ 1,687.50		
4/16/2012	MCC	Worked on complaint [2.4]; phone call with Ms. Hill regarding complaint and employment documents [.2].	2.6	\$ 625.00	\$ 1,625.00		
4/17/2012	MCC	Worked on complaint [1.6]; phone call with Ms. Hill regarding facts for complaint [.4].	2.0	\$ 625.00	\$ 1,250.00		
4/18/2012	MCC	Worked on amended complaint.	1.5	\$ 625.00	\$ 937.50		
4/19/2012	MCC	Worked on complaint [2.2]; conference regarding ACS overtime payment scheme and complaint [.9]; researched Washington employer recordkeeping requirements [.8]; email correspondence regarding recordkeeping requirements [.2]; researched successor liability issue and drafted email summary of law [.3].	4.4	\$ 625.00	\$ 2,750.00		
4/19/2012	TJM	Analyzed issues regarding factual background and worked on complaint [.7].	0.7	\$ 675.00	\$ 472.50		
4/20/2012	MCC	Worked on complaint [1.2]; phone calls with Ms. Hill regarding claims [.4]; conference regarding complaint [.2].	1.8	\$ 625.00	\$ 1,125.00		
4/20/2012	TJM	Worked on complaint [.8].	0.8	\$ 675.00	\$ 540.00		
4/23/2012	MCC	Email correspondence and conference regarding complaint.	0.1	\$ 625.00	\$ 62.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/24/2012	EBN	Worked on complaint and initiating case documents [1.3]; reviewed case opening procedures for federal court [.4]; filed complaint, summons and civil cover sheet [.6]; served complaint on client and co-counsel [.2]; updated contact information [.2].	2.7	\$ 250.00	\$ 675.00		
4/24/2012	MCC	Worked on revisions to complaint [1]; conference regarding complaint filing and service [.2]; phone calls with Ms. Hill regarding complaint [.5]; researched defendant's registered agent information for service [.3].	2.0	\$ 625.00	\$ 1,250.00		
4/24/2012	TJM	Analyzed issues regarding factual background [.2].	0.2	\$ 675.00	\$ 135.00		
4/25/2012	MCC	Received phone call from client regarding case issues [.1]; researched arbitration issue [.2].	0.3	\$ 625.00	\$ 187.50		
4/26/2012	BKK	Reviewed complaint [.1]; prepared caption [.2].	0.3	\$ 200.00	\$ 60.00		
4/26/2012	MCC	Received phone calls from Ms. Hill regarding case documents and case issues [.4]; began reviewing documents sent by Ms. Hill [1.2]; researched arbitration issues in light of dispute resolution plan [2.5]; phone conference with Mr. Johnson and and follow-up conference regarding case strategy [.4].	4.5	\$ 625.00	\$ 2,812.50		
4/26/2012	TJM	Telephone conference with Mr. Johnson regarding factual background issues [.4]; analyzed issues regarding same [.3].	0.7	\$ 675.00	\$ 472.50		
4/27/2012	BKK	Reviewed court issued summons directed to defendants [.1]; arranged service of process on Defendants Xerox Corp., Livebridge, Inc., Affiliated Computer Services, Inc. and Affiliated Computer Services, LLC [.5]; prepared caption [.2]	0.6	\$ 200.00	\$ 120.00		
4/27/2012	MCC	Email correspondence regarding contact from witness [.3]; phone call with witness regarding potential claims and ACS practices [.4]; researched issues regarding same [.3].	1.0	\$ 625.00	\$ 625.00		
5/1/2012	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
5/1/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
5/4/2012	MCC	Worked on case strategy issues.	0.2	\$ 625.00	\$ 125.00		
5/4/2012	TJM	Analyzed issues regarding factual background [.1].	0.1	\$ 675.00	\$ 67.50		
5/8/2012	MCC	Reviewed Judge Jones's order in Comcast case and analyzed need to amend complaint.	0.5	\$ 625.00	\$ 312.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/9/2012	TJM	Telephone conference with co-counsel regarding case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
5/10/2012	MCC	Reviewed arbitration documents submitted by Ms. Hill.	0.5	\$ 625.00	\$ 312.50		
5/11/2012	MCC	Email correspondence regarding appearance by Xerox.	0.1	\$ 625.00	\$ 62.50		
5/11/2012	TJM	Telephone call from opposing counsel regarding request for extension to answer and email to opposing counsel regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
5/16/2012	MCC	Prepared for meeting regarding case strategy [.4]; meeting regarding case strategy [2.2]; reviewed stipulated motion for extension of time to answer [.2]; email correspondence regarding stipulated motion [.1].	2.9	\$ 625.00	\$ 1,812.50		
5/16/2012	TJM	Meeting with Mr. Johnson and co-counsel regarding factual background and case strategy issues [2.4]; reviewed email from opposing counsel with proposed stipulation to extend answering deadline [.1]; email to co-counsel regarding same [.1].	2.6	\$ 675.00	\$ 1,755.00		
5/17/2012	MCC	Phone call with Ms. Hill regarding internet advertising for position [.2]; worked on amended complaint [1]; conferences regarding amended complaint [.2].	1.4	\$ 625.00	\$ 875.00		
5/17/2012	TJM	Email correspondence with opposing counsel regarding stipulation to extend deadline for answering [.1]; analyzed issues regarding amendment of complaint [.3]; email correspondence with opposing counsel regarding same [.1]; email correspondence with Mr. Johnson regarding arbitration issues [.1].	0.6	\$ 675.00	\$ 405.00		
5/18/2012	MCC	Worked on amended complaint [1.5]; conferences regarding strategy for amendment [.5]; email correspondence regarding amendment and appearance of Xerox [.4]; reviewed notice of appearance [.2]; analyzed CPA issues [.3].	2.9	\$ 625.00	\$ 1,812.50		
5/18/2012	TJM	Worked on amended complaint and analyzed issues regarding same [1.0]; email correspondence with opposing counsel regarding same [.1]; worked on case strategy issues [.3].	1.4	\$ 675.00	\$ 945.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/21/2012	BKK	Reviewed case reassignment order [.1]; reviewed notice of appearance of defendants [.1]; amended caption and certificate of service [.2]; reviewed, revised and finalized amended complaint [.4]; arranged filing and service [.2]; arranged delivery of chambers copy by Fedex [.2].	1.2	\$ 200.00	\$ 240.00		
5/21/2012	MCC	Worked on amended complaint.	0.3	\$ 625.00	\$ 187.50		
5/30/2012	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
5/30/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
6/3/2012	MCC	Reviewed answer and began analyzing arguments of defendants and issues for potential amendment [.6]; email correspondence regarding issues raised by answer and potential amendment and [.2]; reviewed orders from court and schedule for discovery conference [.3]; email correspondence regarding discovery conference timing [.1].	1.2	\$ 625.00	\$ 750.00		
6/3/2012	TJM	Reviewed answer to complaint and drafted notes and action items regarding same [.5].	0.5	\$ 675.00	\$ 337.50		
6/4/2012	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
6/4/2012	EBN	Forwarded complaint and amended complaint to vendor for process service on Attorney General.	0.3	\$ 250.00	\$ 75.00		
6/4/2012	MCC	Email correspondence and research regarding requirement to submit filings to AG [.2]; email correspondence regarding case strategy and deadlines for discovery conference and discovery plan [.2].	0.4	\$ 625.00	\$ 250.00		
6/4/2012	TJM	Analyzed issues regarding service of complaint on Attorney General [.1]; analyzed issues regarding discovery [.2].	0.3	\$ 675.00	\$ 202.50		
6/4/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
6/5/2012	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00		
6/5/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
6/8/2012	MCC	Researched alter ego issue and emailed regarding findings [.8].	0.8	\$ 625.00	\$ 500.00		
6/12/2012	MCC	Researched issues relating to Xerox's defenses and analyzed potential amendment of complaint.	3.4	\$ 625.00	\$ 2,125.00		
6/13/2012	MCC	Phone call with Ms. Hill regarding Xerox Business Services.	0.1	\$ 625.00	\$ 62.50		

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
6/14/2012	MCC	Conference regarding case issues, investigation, and witness contact [.3]; phone call regarding potential witness [.1]; began reviewing Group Health opinion regarding witness contact [.6].	1.0	\$ 625.00	\$ 625.00		
6/14/2012	TJM	Analyzed issues regarding communications with witness [.4].	0.4	\$ 675.00	\$ 270.00		
6/22/2012	BKK	Prepared draft of joint report of Rule 26(f) report.	0.6	\$ 200.00	\$ 120.00		
6/22/2012	EBN	Worked on certificate of service [.2]; filed declaration of service of complaint and amended complaint on Attorney General [.3].	0.5	\$ 250.00	\$ 125.00		
6/22/2012	MCC	Reviewed FRCP 26(f) requirements for status conference and discovery plan [.2]; worked on outline of issues to cover in 26(f) conference [.1]; email correspondence regarding discovery plan [.1].	0.4	\$ 625.00	\$ 250.00		
6/29/2012	TJM	Telephone call from co-counsel regarding discovery and case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
7/2/2012	MCC	Email correspondence regarding call from ACS employee.	0.1	\$ 625.00	\$ 62.50		
7/16/2012	EBN	Left messages for potential class member regarding lawsuit status.	0.2	\$ 250.00	\$ 50.00		
7/17/2012	EBN	Telephone conferences with potential class members regarding claims [.5]; email to counsel regarding summary of interviews [.4].	0.9	\$ 250.00	\$ 225.00		
7/17/2012	MCC	Email correspondence regarding phone calls from potential class members.	0.2	\$ 625.00	\$ 125.00		
7/17/2012	TJM	Telephone call from and email correspondence with Mr. Dale regarding factual background issues and status of case [.2].	0.2	\$ 675.00	\$ 135.00		
7/23/2012	MCC	Conference regarding calls from witnesses [.1]; phone call with potential class member [.2].	0.3	\$ 625.00	\$ 187.50		
7/23/2012	TJM	Worked on witness and discovery issues [.1].	0.1	\$ 675.00	\$ 67.50		
7/24/2012	MCC	Prepared for meeting with potential class member [1.3]; phone call with potential class member [.1].	1.4	\$ 625.00	\$ 875.00		
7/24/2012	TJM	Analyzed issues regarding additional plaintiffs [.2]; meeting with co-counsel regarding same [.4]; left message with Mr. Johnson regarding case management [.1].	0.7	\$ 675.00	\$ 472.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/25/2012	MCC	Prepared for phone call with former ACS employee regarding ACS practices [.3]; phone call with former ACS employee regarding ACS practices [.7]; conferences regarding ACS case strategy [.3].	1.3	\$ 625.00	\$ 812.50		
7/25/2012	TJM	Worked on witness and case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
7/26/2012	MCC	Met with potential class member regarding case (including travel time) [3.4]	3.4	\$ 625.00	\$ 2,125.00		
7/27/2012	MCC	Reviewed client documents in preparation for amendment of complaint [.5]; email correspondence regarding client meeting and email correspondence with client regarding claims [.5].	1.0	\$ 625.00	\$ 625.00		
7/30/2012	MCC	Researched Verizon call centers in preparation for amendment of complaint [.3]; reviewed new case law regarding arbitration decision [.4]; email correspondence to client regarding case issues [.2]; conferences regarding case strategy [.2].	1.1	\$ 625.00	\$ 687.50		
7/30/2012	TJM	Telephone conference with Mr. Johnson regarding factual background and case strategy issues [.3]; worked on joint prosecution agreement [.2]; email correspondence with co-counsel regarding same [.1]; worked on case strategy, discovery, witness, and factual background issues [1.3]; analyzed issues regarding possibility of arbitration [.2].	2.1	\$ 675.00	\$ 1,417.50		
7/31/2012	MCC	Phone call with potential class member regarding claims and potential witnesses.	0.2	\$ 625.00	\$ 125.00		
7/31/2012	TJM	Email correspondence with co-counsel regarding joint prosecution agreement [.1].	0.1	\$ 675.00	\$ 67.50		
8/1/2012	EBN	Call with potential class member regarding case status [.3]; updated call log [.2].	0.5	\$ 250.00	\$ 125.00		
8/1/2012	MCC	Phone call with potential class member regarding claims and witnesses [.3]; email correspondence with potential class member regarding case issues [.1].	0.4	\$ 625.00	\$ 250.00		
8/7/2012	MCC	Analyzed case status and strategy.	0.1	\$ 625.00	\$ 62.50		
8/10/2012	TJM	Email correspondence with class member regarding lawsuit [.1]; email correspondence with co-counsel regarding same [.1].	0.2	\$ 675.00	\$ 135.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/13/2012	MCC	Email correspondence regarding 26(f) conference [.1]; phone call with co-counsel regarding 26(f) conference strategy and arbitration issue [.3]; conferences regarding 26(f), case strategy and settlement strategy [.5]; worked on 26(f) conference outline and prepared for conference [.8]; researched entitlement to class list [.3]; reviewed news and settlement documents regarding Oregon ACS settlement [.7]; drafted notice regarding case for website [.2].	2.9	\$ 625.00	\$ 1,812.50		
8/13/2012	TJM	Worked on case strategy and discovery issues [.3]; researched factual background issues [.4].	0.7	\$ 675.00	\$ 472.50		
8/14/2012	MCC	Worked on letter concerning Rule 26(f) conference to Mr. Madden, including analysis of documents and information needed in discovery [2.1]; received call from potential class member regarding ACS pay practices [.4]; conferences regarding case strategy and ACS pay practices [.4]; reviewed WD of Washington ESI protocols in preparation for revision of letter to Mr. Madden and Rule 26(f) conference [.3].	3.2	\$ 625.00	\$ 2,000.00		
8/14/2012	TJM	Analyzed issues regarding witnesses, factual background, and strategy for declarations [.8]; worked on letter to opposing counsel regarding discovery [.3].	1.1	\$ 675.00	\$ 742.50		
8/15/2012	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
8/15/2012	MCC	Worked on revisions of document request description and letter to Mr. Madden [1.2]; email correspondence regarding Rule 26(f) conference [.1]; reviewed Western District proposed model protocol for ESI and worked on ESI outline for Rule 26(f) conference [1.3].	2.6	\$ 625.00	\$ 1,625.00		
8/15/2012	TJM	Worked on discovery issues [.2].	0.2	\$ 675.00	\$ 135.00		
8/15/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/16/2012	MCC	Worked on revisions of document categories for discovery and letter to Mr. Madden [.8]; worked on outline of ESI issues [.6]; phone conference with co-counsel regarding case strategy and ESI issues [.5]; phone call with potential class member regarding relevant documents and meeting [.2]; analyzed issues regarding same [.2].	2.3	\$ 625.00	\$ 1,437.50		
8/16/2012	TJM	Analyzed issues regarding additional plaintiffs [.1].	0.1	\$ 675.00	\$ 67.50		
8/16/2012	TJM	Telephone conference with co-counsel regarding discovery and case strategy issues [.5]; worked on same [.3].	0.8	\$ 675.00	\$ 540.00		
8/17/2012	MCC	Revised and sent letter and ESI outline to counsel for review [.2]; prepared for and participated in meeting with potential class member regarding factual background and claims [2.1]; reviewed documents and summarized meeting with potential class member [.5].	2.8	\$ 625.00	\$ 1,750.00		
8/20/2012	EBN	Finalized and forwarded letter to opposing counsel and outline regarding discovery conference.	0.8	\$ 250.00	\$ 200.00		
8/20/2012	MCC	Conference regarding case strategy and potential class representative [.4]; revised letter to Mr. Madden regarding 26(f) conference [.4]; email correspondence regarding 26(f) letter and other case issues [.1].	0.9	\$ 625.00	\$ 562.50		
8/20/2012	TJM	Analyzed issues regarding additional named plaintiff [.1]; worked on discovery issues [.1]; analyzed factual background issues [.7].	0.9	\$ 675.00	\$ 607.50		
8/21/2012	BKK	Reviewed notice of appearance of Daniel Johnson [.1]; updated caption [.1]; updated ProLaw contacts [.1]; email correspondence from potential class member [.2].	0.5	\$ 200.00	\$ 100.00	\$ 100.00	0.5
8/21/2012	MCC	Email correspondence regarding email from potential class member [.1]; reviewed and analyzed ABC plan documents [.5]; email correspondence regarding ABC plan documents [.1].	0.7	\$ 625.00	\$ 437.50		
8/21/2012	TJM	Researched and analyzed issues regarding factual background and legal claims [.6].	0.6	\$ 675.00	\$ 405.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/22/2012	MCC	Email correspondence regarding assessment of legality of ACS/Xerox's compensation system [.5]; researched issues related to federal regulations on productive vs. non-productive time [.7].	1.2	\$ 625.00	\$ 750.00		
8/22/2012	TJM	Researched and analyzed issues regarding factual background and legal claims and drafted memorandum regarding same [2.5].	2.5	\$ 675.00	\$ 1,687.50		
8/23/2012	MCC	Reviewed authorities interpreting federal regulation on productive time vs. nonproductive time [.7]; summarized relevant portions of case law [.7]; email correspondence regarding authorities interpreting regulation [.2]; email correspondence regarding Rule 26(f) conference [.1]; phone call with Ms. Hill regarding case status [.2].	1.9	\$ 625.00	\$ 1,187.50		
8/23/2012	TJM	Researched and analyzed issues regarding legal claims [.2].	0.2	\$ 675.00	\$ 135.00		
8/24/2012	EBN	Call with class member regarding termination from ACS [.2]; email regarding same [.2].	0.4	\$ 250.00	\$ 100.00		
8/24/2012	MCC	Email correspondence regarding witnesses and class representatives [.1]; worked on outline of issues for Rule 26(f) conference and status report [1.8]; email correspondence regarding call from ACS employee [.3]; conference regarding discovery issues and other case issues [.7]; researched jury or bench trial issues [.3].	3.2	\$ 625.00	\$ 2,000.00		
8/24/2012	TJM	Analyzed issues regarding discovery case strategy [.6].	0.6	\$ 675.00	\$ 405.00		
8/27/2012	MCC	Email correspondence regarding Rule 26(f) conference [.2]; conference regarding phone call from call center employee [.3]; prepared for Rule 26(f) conference and discovery requests [.5].	1.0	\$ 625.00	\$ 625.00		
8/27/2012	TJM	Worked on discovery issues [.6]; telephone call from co-counsel regarding same [.2]; telephone call from potential class member regarding factual background issues [.3]; worked on same [.4].	1.5	\$ 675.00	\$ 1,012.50		
8/28/2012	MCC	Received phone call from potential class member regarding ACS pay practices [.7]; prepared for Rule 26(f) conference [1.5]; pre-26(f) phone conference with co-counsel [.7]; Rule 26(f) phone conference with opposing counsel [2]; conferences regarding case strategy [.3].	5.2	\$ 625.00	\$ 3,250.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/28/2012	TJM	Telephone conferences with co-counsel regarding case strategy and discovery issues [.6]; prepared for and participated in Rule 26(f) conference with opposing counsel [2.4]; worked on discovery and witness issues [.6].	3.6	\$ 675.00	\$ 2,430.00		
8/29/2012	MCC	Worked on discovery plan and joint status report [1.6]; phone call with call center worker [.2]; memorandum email regarding issues arising from Rule 26(f) conference [.4].	2.2	\$ 625.00	\$ 1,375.00		
8/29/2012	TJM	Worked on factual background issues [.2]; left message with potential class member regarding same [.1].	0.3	\$ 675.00	\$ 202.50		
8/29/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
8/30/2012	REH	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/4/2012	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
9/4/2012	MCC	Worked on discovery plan and status report [.8]; analyzed damages model and information needed for assumptions and calculations [2.5]; conferences regarding information needed from ACS/Xerox for settlement assessment [.7]; worked on letter to Mr. Madden regarding request for information [1]; received phone call from Ms. Hill regarding case status [.2]; phone call with Lacey call center employee regarding unpaid wages and ACS/Xerox compensation system [.7].	5.9	\$ 625.00	\$ 3,687.50		
9/4/2012	TJM	Worked on damages analysis for settlement discussions [.8]; worked on joint status report and case strategy issues [.8].	1.6	\$ 675.00	\$ 1,080.00		
9/5/2012	MCC	Worked on revisions to joint status report and discovery plan [.7]; extensive email correspondence regarding joint status report and discovery plan and letter regarding information for damages calculations [.8]; conference regarding information needed for damages calculations for potential settlement [.5]; revised letter regarding information needed for damages calculations [.8].	2.8	\$ 625.00	\$ 1,750.00		
9/5/2012	TJM	Worked on discovery and case and settlement strategy issues [.7].	0.7	\$ 675.00	\$ 472.50		
9/5/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/7/2012	BKK	Prepared draft of plaintiff's Rule 26(a)(1) initial disclosures.	0.3	\$ 200.00	\$ 60.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/7/2012	EBN	Worked on public disclosure request to Department of Labor & Industries [.5].	0.5	\$ 250.00	\$ 125.00		
9/7/2012	EBN	Worked on letter to opposing counsel regarding expedited discovery [.5].	0.5	\$ 250.00	\$ 125.00		
9/7/2012	MCC	Email correspondence regarding informal discovery letter [.8]; documented class member phone calls [.8]; began reviewing Defendants' revisions of status report [.2]; worked on PDR letter to Department of L&I [.3]; began working on initial disclosures [.4].	2.5	\$ 625.00	\$ 1,562.50		
9/7/2012	TJM	Analyzed issues regarding informal discovery requests [.1].	0.1	\$ 675.00	\$ 67.50		
9/9/2012	MCC	Reviewed Defendants' revisions to joint status report and began analyzing counter-revisions.	0.5	\$ 625.00	\$ 312.50		
9/10/2012	BKK	Reviewed Redekopp notice of appearance [.2]; amended certificate of service [.2].	0.4	\$ 200.00	\$ 80.00	\$ 80.00	0.4
9/10/2012	MCC	Worked on revisions to status report and discovery plan [.9]; email correspondence regarding revisions to status report and amendment issue [.3].	1.2	\$ 625.00	\$ 750.00		
9/11/2012	EBN	Researched UBI numbers for entities listed in public disclosure request [.2]; email to L&I public records officer regarding same [.1]; received call from L&I public records officer regarding scope of request and time frame for response [.1]; email correspondence regarding same [.3]; finalized and filed joint status report [.6].	1.3	\$ 250.00	\$ 325.00		
9/11/2012	MCC	Phone call with opposing counsel regarding suggested revisions of joint status report [.5]; email correspondence regarding suggested revisions of joint status report [.5]; phone call with co-counsel regarding same [.1]; worked on review and revisions of joint status report [.6].	1.7	\$ 625.00	\$ 1,062.50		
9/11/2012	TJM	Worked on discovery issues [.2].	0.2	\$ 675.00	\$ 135.00		
9/12/2012	EBN	Email to potential class member regarding status of case.	0.2	\$ 250.00	\$ 50.00		
9/13/2012	MCC	Began working on initial disclosures.	0.1	\$ 625.00	\$ 62.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/14/2012	MCC	Conference regarding case strategy [.1]; phone calls with class members regarding claims [.5]; email correspondence regarding class member calls [.1].	0.7	\$ 625.00	\$ 437.50		
9/14/2012	TJM	Worked on case strategy issues [.1]; analyzed issues regarding class member inquiries [.1]; email correspondence with class member regarding same [.1].	0.3	\$ 675.00	\$ 202.50		
9/16/2012	MCC	Worked on initial disclosures.	3.3	\$ 625.00	\$ 2,062.50		
9/16/2012	TJM	Analyzed issues regarding initial disclosures [.2].	0.2	\$ 675.00	\$ 135.00		
9/17/2012	EBN	Telephone conferences with class members regarding case status [.5]; updated class member database [.3].	0.8	\$ 250.00	\$ 200.00		
9/17/2012	MCC	Worked on initial disclosures and revisions of initial disclosures [.8]; phone conference regarding initial disclosures [.4].	1.2	\$ 625.00	\$ 750.00		
9/17/2012	TJM	Worked on initial disclosure issues and telephone conference with co-counsel regarding same [.8].	0.8	\$ 675.00	\$ 540.00		
9/18/2012	EBN	Finalized and forwarded initial disclosures [.3]; telephone conferences with class members regarding case status [.6].	0.9	\$ 250.00	\$ 225.00		
9/18/2012	MCC	Worked on initial disclosures [.7]; email correspondence and conference regarding initial disclosures [.1]; reviewed protective order from Sump case [.2]; email correspondence regarding same [.1].	1.1	\$ 625.00	\$ 687.50		
9/18/2012	TJM	Analyzed issues regarding initial disclosures [.1].	0.1	\$ 675.00	\$ 67.50		
9/20/2012	EBN	Call with class member regarding letter from Xerox regarding lawsuit; email to counsel regarding same.	0.4	\$ 250.00	\$ 100.00		
9/20/2012	MCC	Reviewed and analyzed Heartland's initial disclosures.	0.3	\$ 625.00	\$ 187.50		
9/20/2012	MCC	Received phone call from potential class member regarding Xerox's attempt to prevent class action participation [.5]; phone call regarding strategy concerning Xerox's attempt to prevent class action participation [.3].	0.8	\$ 625.00	\$ 500.00		
9/20/2012	TJM	Telephone call from potential class member regarding employer's decision to ban employees from participating in class action [.2]; researched and analyzed issues regarding same and retaliation laws [.5].	0.7	\$ 675.00	\$ 472.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/21/2012	MCC	Began reviewing new Xerox documents regarding prohibition on participation in class action.	0.4	\$ 625.00	\$ 250.00		
9/24/2012	EBN	Email to potential class member regarding lawsuit status [.2]; email correspondence regarding class member termination issue [.4].	0.6	\$ 250.00	\$ 150.00		
9/24/2012	MCC	Reviewed and analyzed new dispute resolution documents [.3]; outlined relevant new provisions [.3]; email correspondence regarding new dispute resolution documents [.1].	0.7	\$ 625.00	\$ 437.50		
9/25/2012	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
9/25/2012	MCC	Email correspondence regarding call from class member [.1]; analyzed DRP changes [.3]; conference regarding DRP changes and appropriate response [.4].	0.8	\$ 625.00	\$ 500.00		
9/25/2012	TJM	Analyzed issues regarding defendants' efforts to prevent employees from participating in class actions [.3].	0.3	\$ 675.00	\$ 202.50		
9/25/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/26/2012	EBN	Updated call log.	0.3	\$ 250.00	\$ 75.00		
9/26/2012	MCC	Email correspondence regarding letter to Mr. Madden [.4]; analyzed legal issues for letter to Mr. Madden [.7]; worked on revisions of letter to Mr. Madden [.8].	1.9	\$ 625.00	\$ 1,187.50		
9/26/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/27/2012	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
9/27/2012	EBN	Finalized and forwarded letter to opposing counsel.	0.2	\$ 250.00	\$ 50.00		
9/27/2012	MCC	Phone call with class member regarding claims [.7]; email correspondence regarding case [.1].	0.8	\$ 625.00	\$ 500.00		
9/27/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/28/2012	MCC	Conference regarding case strategy [.1]; reviewed and analyzed letter from opposing counsel regarding settlement information [.3]; analyzed damages data [.3]; email correspondence regarding same [.1].	0.8	\$ 625.00	\$ 500.00		
10/1/2012	EBN	Telephone conference with class members.	0.6	\$ 250.00	\$ 150.00		
10/2/2012	EBN	Call with class member regarding case status.	0.3	\$ 250.00	\$ 75.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/2/2012	MCC	Email correspondence regarding damages issues and case strategy [.4]; worked on troubleshooting CD decryption [.3]; analyzed damages [.1].	0.8	\$ 625.00	\$ 500.00		
10/2/2012	TJM	Worked on damages issues [.2].	0.2	\$ 675.00	\$ 135.00		
10/3/2012	EBN	Worked on file organization.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
10/3/2012	MCC	Email correspondence regarding case strategy and damages calculations [.5]; meeting with witness regarding timekeeping system, unpaid time, and other issues related to case [1.7]; worked on damages analysis [.3]; analyzed case strategy issues [.2].	2.7	\$ 625.00	\$ 1,687.50		
10/3/2012	TJM	Meeting with potential class member regarding factual background issues [.4]; analyzed factual background issues [.2].	0.6	\$ 675.00	\$ 405.00		
10/4/2012	MCC	Reviewed and analyzed letter from Mr. Madden regarding DRP changes.	0.2	\$ 625.00	\$ 125.00		
10/4/2012	MCC	Meeting regarding case strategy and settlement strategy [2]; reviewed and analyzed documents produced by Xerox [.8]; analyzed potential witnesses [.1].	2.9	\$ 625.00	\$ 1,812.50		
10/4/2012	TJM	Analyzed issues regarding factual background, legal claims, case strategy, and settlement [2.5].	2.5	\$ 675.00	\$ 1,687.50		
10/5/2012	MCC	Reviewed and analyzed correspondence from Mr. Madden [.7]; conferences regarding case strategy [.4]; email correspondence with co-counsel regarding case issues [.3]; phone call with witness regarding facts relating to Xerox timekeeping practices [.4]; analyzed damages issues [.4].	2.2	\$ 625.00	\$ 1,375.00		
10/5/2012	TJM	Analyzed factual background issues and worked on case and settlement strategy [.6].	0.6	\$ 675.00	\$ 405.00		
10/8/2012	MCC	Worked on damages calculations.	0.9	\$ 625.00	\$ 562.50		
10/9/2012	EBN	Forwarded defendants' document production to co-counsel.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
10/9/2012	EBN	Telephone conferences with class members regarding case status.	0.3	\$ 250.00	\$ 75.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/9/2012	MCC	Researched piecework issue [1.1]; emails regarding case strategy [.6]; emails regarding damages calculation and settlement [.5]; prepared for phone conference regarding case strategy and settlement issues [1.5]; participated in phone conference regarding case strategy and settlement issues [1]; analyzed DRP issues [.7]; reviewed documents produced by Defendants [1].	6.4	\$ 625.00	\$ 4,000.00		
10/9/2012	TJM	Analyzed and worked on issues regarding damages calculations, legal claims, factual background, case strategy, and settlement strategy [3.7].	3.7	\$ 675.00	\$ 2,497.50		
10/11/2012	EBN	Correspondence regarding issues with production CD from Defendants [.2]; call with potential class member regarding case status [.2].	0.4	\$ 250.00	\$ 100.00		
10/11/2012	TJM	Analyzed issues regarding case strategy [.4].	0.4	\$ 675.00	\$ 270.00		
10/12/2012	EBN	Correspondence with opposing counsel regarding production.	0.2	\$ 250.00	\$ 50.00		
10/14/2012	MCC	Analyzed information needed for settlement and status conference issues.	0.1	\$ 625.00	\$ 62.50		
10/14/2012	TJM	Researched and analyzed issues regarding piecerate pay and rest break claims [.2].	0.2	\$ 675.00	\$ 135.00		
10/15/2012	MCC	Phone call with co-counsel in preparation for status conference [.3]; outlined summary of relevant issues for status conference [.9]; email correspondence regarding damages issues and letter [.2]; drafted letter and collected documents in response to defendants' request for information [.7]; email correspondence regarding various case issues [.1].	2.2	\$ 625.00	\$ 1,375.00		
10/15/2012	TJM	Analyzed issues regarding status conference and case scheduling deadlines [.3]; telephone conference with opposing counsel regarding same [.2]; researched and analyzed issues regarding consolidation of cases [.2]; drafted outline for status conference [.2].	0.9	\$ 675.00	\$ 607.50		
10/16/2012	EBN	Downloaded document production [.2]; worked on file organization [.1].	0.3	\$ 250.00	\$ 75.00	\$ 75.00	0.3

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/16/2012	EBN	Worked on document production [.3]; finalized and forwarded correspondence and production to opposing counsel [.2].	0.5	\$ 250.00	\$ 125.00		
10/16/2012	MCC	Prepared for status conference and meeting [.4]; attended status conference and meeting with co-counsel, including travel time [1.6]; finalized letter regarding discovery production [.2]; worked on stipulation and order regarding class certification [.4]; reviewed Defendant's limited production of FEPS data [.3].	2.9	\$ 625.00	\$ 1,812.50		
10/16/2012	TJM	Prepared for and attended status conference and returned from same [1.4]; meetings with co-counsel and opposing counsel regarding settlement negotiations and exchange of information [.3]; meeting with co-counsel regarding case strategy issues [.2]; worked on discovery issues [.1].	2.0	\$ 675.00	\$ 1,350.00		
10/17/2012	EBN	Updated class member contact spreadsheet [.5]; email to class member regarding contact information [.2].	0.7	\$ 250.00	\$ 175.00		
10/17/2012	MCC	Worked on stipulation and proposed order regarding class certification scheduling [.4]; email correspondence regarding stipulation and proposed order [.4]; analyzed time records produced by Defendants and worked on comparisons to pay stubs and damages calculations [1.9].	2.7	\$ 625.00	\$ 1,687.50		
10/17/2012	TJM	Reviewed spreadsheets with pay data for Ms. Hill and analyzed issues regarding same [.5]; email correspondence with co-counsel regarding same [.1]; worked on damages formulae [.2]; analyzed issues regarding proposed order on class certification briefing [.1].	0.9	\$ 675.00	\$ 607.50		
10/18/2012	MCC	Analyzed damages calculations and Defendants' records for Ms. Hill [.3]; meeting regarding damages calculations and Defendants' records [.8]; email correspondence regarding proposed order regarding class certification schedule [.1].	1.2	\$ 625.00	\$ 750.00		
10/18/2012	TJM	Reviewed payroll data for Ms. Hill and worked on damages analyses [.8].	0.8	\$ 675.00	\$ 540.00		
10/18/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/19/2012	MCC	Phone call with Tiffany Hill regarding case status [.3]; email correspondence regarding Tiffany Hill and protective order [.1].	0.4	\$ 625.00	\$ 250.00		
10/22/2012	MCC	Reviewed email correspondence and waiver docs [.1]; email correspondence regarding average hourly rate [.1].	0.2	\$ 625.00	\$ 125.00		
10/23/2012	MCC	Email correspondence regarding contact from class member and status of information from Xerox.	0.4	\$ 625.00	\$ 250.00		
10/24/2012	EBN	Completed form declining magistrate judge; forwarded same to Court Clerk.	0.2	\$ 250.00	\$ 50.00		
10/24/2012	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
10/24/2012	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
10/26/2012	EBN	Correspondence regarding response to public records request to Department of L&I [.1]; worked on file organization [.1].	0.2	\$ 250.00	\$ 50.00		
10/29/2012	BKK	Reviewed Daniel Hurley notice of withdrawal [.1]; amended certificate of service [.1].	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
10/30/2012	MCC	Conference regarding consolidation issue and settlement negotiation status [.2]; email correspondence regarding consolidation issues [.7].	0.9	\$ 625.00	\$ 562.50		
10/30/2012	TJM	Analyzed issues regarding consolidation of state case with FLSA case [.1]; email correspondence with co-counsel regarding same [.1].	0.2	\$ 675.00	\$ 135.00		
10/31/2012	MCC	Phone call with co-counsel regarding consolidation issues [.2]; analyzed consolidation and settlement issues in preparation for call with opposing counsel [.3]; phone call with opposing counsel regarding consolidation/coordination and variance report data for settlement [.6]; conference regarding case issues [.2].	1.3	\$ 625.00	\$ 812.50		
10/31/2012	TJM	Telephone conference with opposing counsel regarding settlement issues [.2]; worked on case strategy issues [.3].	0.5	\$ 675.00	\$ 337.50		
11/1/2012	EBN	Commenced document review of L&I complaints.	0.5	\$ 250.00	\$ 125.00		
11/1/2012	MCC	Email correspondence regarding variance reports and damages calculations [.3]; analyzed Ms. Hill's FEPS spreadsheets [.2].	0.5	\$ 625.00	\$ 312.50		
11/1/2012	TJM	Analyzed issues regarding damages and settlement strategy [.2].	0.2	\$ 675.00	\$ 135.00		
11/2/2012	EBN	Worked on review and index of complaints received from L&I.	2.5	\$ 250.00	\$ 625.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/6/2012	EBN	Updated class member contact spreadsheet.	0.2	\$ 250.00	\$ 50.00		
11/7/2012	EBN	Updated class member contact database; email regarding follow up call with class member [.3].	0.3	\$ 250.00	\$ 75.00		
11/7/2012	MCC	Received phone call from Ms. Hill regarding case [.3]; reviewed complaints in response to PDR [.2]; began reviewing settlement letter from Mr. Madden and analyzing necessary damages calculations [.5].	1.0	\$ 625.00	\$ 625.00		
11/8/2012	MCC	Worked on damages calculations for settlement [2]; phone calls with Mr. Johnson regarding damages calculations for settlement [.8]; email correspondence regarding same [.3]	3.1	\$ 625.00	\$ 1,937.50		
11/9/2012	MCC	Reviewed and analyzed emails regarding damages information and co-counsel's call with Mr. Madden.	0.2	\$ 625.00	\$ 125.00		
11/9/2012	TJM	Analyzed issues regarding damages and settlement negotiations [.5].	0.5	\$ 675.00	\$ 337.50		
11/12/2012	EBN	Email to potential class member regarding case status [.2]; left message for same [.1].	0.3	\$ 250.00	\$ 75.00		
11/12/2012	MCC	Reviewed email correspondence and information from Mr. Madden in preparation for settlement strategy meeting [.6]; conferences regarding settlement strategy and damages information [1.2].	1.8	\$ 625.00	\$ 1,125.00		
11/12/2012	TJM	Analyzed issues regarding damages calculations and factual background development [1.0]; telephone conference with co-counsel regarding same [.2]; researched and analyzed issues regarding gap time claims [1.6].	2.8	\$ 675.00	\$ 1,890.00		
11/13/2012	MCC	Worked on argument for off-the-clock portion of settlement demand, including legal research [3.2]; analyzed Washington WAC regulations for gap time claim [.4]; email correspondence regarding same [.2].	3.8	\$ 625.00	\$ 2,375.00		
11/13/2012	TJM	Researched and analyzed issues regarding gap-time claim under state law and drafted memorandum to co-counsel regarding same [.8]; email correspondence with co-counsel regarding same [.1].	0.9	\$ 675.00	\$ 607.50		
11/14/2012	EBN	Call with potential class member regarding case status.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/14/2012	MCC	Worked on settlement demand section for off-the-clock claims [1.3]; phone call with Ms. Hill regarding same [.5].	1.8	\$ 625.00	\$ 1,125.00		
11/15/2012	MCC	Received and began reviewing and analyzing correspondence regarding hours worked and compensation paid [.2]; phone call with class member witness regarding ACS/Xerox practices [.5].	0.7	\$ 625.00	\$ 437.50		
11/16/2012	MCC	Worked on data analysis and calculations for settlement offer [.3]; conferences regarding same [.3].	0.6	\$ 625.00	\$ 375.00		
11/16/2012	TJM	Worked on factual background and case strategy issues [.4].	0.4	\$ 675.00	\$ 270.00		
11/19/2012	MCC	Worked on damages calculations and settlement demand section for off-the-clock claims.	2.0	\$ 625.00	\$ 1,250.00		
11/20/2012	MCC	Worked on settlement offer section on "off-the-clock" work [.8]; worked on damages calculations [.7]; phone call with Mr. Johnson regarding settlement strategy [.3]; reviewed emails regarding information for settlement offer [.2]; email correspondence regarding same [.1]; analyzed settlement issues [.3].	2.4	\$ 625.00	\$ 1,500.00		
11/24/2012	TJM	Worked on damages calculations and factual background issues [1.3].	1.3	\$ 675.00	\$ 877.50		
11/25/2012	MCC	Analyzed off-the clock settlement demand; email correspondence regarding demand and off-the-clock damages calculations.	0.2	\$ 625.00	\$ 125.00		
11/26/2012	MCC	Worked on off-the-clock section for settlement demand [.7]; worked on damages calculations and damages spreadsheets to produce to opposing counsel [1.3]; email correspondence regarding damages and settlement demand letter [.2].	2.2	\$ 625.00	\$ 1,375.00		
11/26/2012	TJM	Worked on issues regarding damages calculations and settlement proposal [.2].	0.2	\$ 675.00	\$ 135.00		
11/27/2012	MCC	Worked on ER 408 damages spreadsheet for gap time claims.	0.5	\$ 625.00	\$ 312.50		
11/27/2012	TJM	Telephone conference with co-counsel regarding case strategy [.2]; worked on damages calculations [.2].	0.4	\$ 675.00	\$ 270.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/28/2012	MCC	Worked on damages spreadsheets [.8]; phone call from Tiffany Hill regarding witnesses and case status [.2]; email correspondence regarding damages spreadsheets [.2]; conference regarding strategy for demand [.4].	1.6	\$ 625.00	\$ 1,000.00		
11/28/2012	TJM	Worked on damages issues and settlement strategy [.4].	0.4	\$ 675.00	\$ 270.00		
11/29/2012	MCC	Worked on damages calculations and spreadsheets [2]; phone call with class member witness [.7]; conference regarding settlement strategy [.9]; analyzed settlement strategy [.4].	4.0	\$ 625.00	\$ 2,500.00		
11/29/2012	TJM	Worked on damages calculations and factual background issues [1.6].	1.6	\$ 675.00	\$ 1,080.00		
11/30/2012	MCC	Began reviewing settlement demand draft; email correspondence regarding consent forms.	0.2	\$ 625.00	\$ 125.00		
12/3/2012	MCC	Worked on settlement letter and aggregate damages calculations, including interest calculation.	3.0	\$ 625.00	\$ 1,875.00		
12/4/2012	MCC	Worked on settlement letter and damages spreadsheets [.8]; conference regarding settlement letter, spreadsheets and strategy [.3].	1.1	\$ 625.00	\$ 687.50		
12/4/2012	TJM	Worked on settlement letter to opposing counsel and damages calculations and analyzed issues regarding same [1.4].	1.4	\$ 675.00	\$ 945.00		
12/5/2012	MCC	Worked on settlement letter and damages spreadsheets.	1.5	\$ 625.00	\$ 937.50		
12/5/2012	TJM	Worked on settlement issues and damages calculations [.3].	0.3	\$ 675.00	\$ 202.50		
12/6/2012	JJB	Personal conferences regarding damages calculations [.1].	0.1	\$ 250.00	\$ 25.00		
12/6/2012	MCC	Worked on settlement demand and damages spreadsheets [2.2]; conference regarding settlement strategy [.6].	2.8	\$ 625.00	\$ 1,750.00		
12/6/2012	TJM	Analyzed issues regarding settlement demand [.5]; telephone conference with co-counsel regarding settlement strategy [.6].	1.1	\$ 675.00	\$ 742.50		
12/7/2012	MCC	Analyzed settlement strategy [.5]; phone call with co-counsel regarding settlement strategy [.5]; compiled and submitted settlement offer package [.3]; worked on amended complaint [.8].	2.1	\$ 625.00	\$ 1,312.50		
12/10/2012	MCC	Worked on amendments to complaint.	1.2	\$ 625.00	\$ 750.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/11/2012	MCC	Analyzed discovery issues [.1]; phone call from client regarding case status [.2].	0.3	\$ 625.00	\$ 187.50		
12/12/2012	MCC	Worked on discovery requests.	0.2	\$ 625.00	\$ 125.00		
12/13/2012	EBN	Telephone conference with potential class member regarding case status [.5]; worked on discovery requests to defendants [1]; telephone conference with class member from related case regarding settlement [.1].	1.6	\$ 250.00	\$ 400.00		
12/13/2012	MCC	Email correspondence regarding potential class member; analyzed discovery issues.	0.1	\$ 625.00	\$ 62.50		
12/14/2012	EBN	Worked on draft discovery requests.	0.5	\$ 250.00	\$ 125.00		
12/14/2012	MCC	Worked on discovery requests.	1.3	\$ 625.00	\$ 812.50		
12/17/2012	EBN	Worked on draft requests for production [2]; correspondence regarding production log and index [.2].	2.2	\$ 250.00	\$ 550.00		
12/17/2012	MCC	Worked on discovery requests.	0.2	\$ 625.00	\$ 125.00		
12/17/2012	TJM	Worked on discovery and case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
12/18/2012	EBN	Worked on production index.	0.3	\$ 250.00	\$ 75.00		
12/18/2012	MCC	Worked on discovery requests.	1.3	\$ 625.00	\$ 812.50		
12/19/2012	JJB	Personal conference regarding discovery requests [.3].	0.3	\$ 250.00	\$ 75.00		
12/19/2012	MCC	Worked on discovery requests [2.3]; conference regarding search term issues and discovery strategy [.3].	2.6	\$ 625.00	\$ 1,625.00		
12/20/2012	EBN	Continued work on document review.	2.0	\$ 250.00	\$ 500.00		
12/20/2012	MCC	Worked on discovery requests.	1.5	\$ 625.00	\$ 937.50		
12/26/2012	MCC	Worked on discovery requests [.5]; email correspondence regarding discovery requests and settlement strategy [.2].	0.7	\$ 625.00	\$ 437.50		
12/27/2012	EBN	Completed production index; worked on production log.	0.3	\$ 250.00	\$ 75.00		
12/27/2012	MCC	Began reviewing letter from Mr. Madden regarding settlement demand.	0.4	\$ 625.00	\$ 250.00		
12/27/2012	TJM	Reviewed defendants' response to settlement offer and analyzed issues regarding same [.5]; telephone call from co-counsel regarding same [.2].	0.7	\$ 675.00	\$ 472.50		
12/31/2012	MCC	Analyzed settlement issues.	0.1	\$ 625.00	\$ 62.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/31/2012	MCC	Continued reviewing and analyzing settlement letter from Mr. Madden.	0.2	\$ 625.00	\$ 125.00		
1/2/2013	EBN	Email correspondence regarding class member issue.	0.2	\$ 250.00	\$ 50.00		
1/2/2013	MCC	Reviewed and analyzed settlement letter, researched cases and regulations cited by Mr. Madden, and outlined issues for responses.	2.9	\$ 625.00	\$ 1,812.50		
1/3/2013	MCC	Prepared for call regarding settlement strategy [.4]; call regarding settlement strategy [1]; outlined issues for call with Mr. Madden and prepared for call [.4]; conferences regarding settlement strategy [.4]; analyzed Sump settlement issues [.2].	2.4	\$ 625.00	\$ 1,500.00		
1/3/2013	TJM	Reviewed defendants' response to settlement offer, researched and analyzed issues regarding same, and participated in telephone conference with co-counsel regarding same [2.7]; email correspondence with opposing counsel regarding scheduling of conference call to discuss settlement issues [.1].	2.8	\$ 675.00	\$ 1,890.00		
1/4/2013	EBN	Worked on class member contact database.	0.6	\$ 250.00	\$ 150.00		
1/4/2013	MCC	Prepared for call with Mr. Madden [.3]; call with Mr. Madden regarding settlement issues [1]; drafted summary of call [.5]; email correspondence regarding phone call with Mr. Madden and case strategy [.5]; began reviewing Spokane ABC plan [.1].	2.4	\$ 625.00	\$ 1,500.00		
1/4/2013	TJM	Prepared for and participated in phone call with opposing counsel regarding settlement, legal issues, and factual background issues [1.1]; analyzed issues regarding same [.7].	1.8	\$ 675.00	\$ 1,215.00		
1/6/2013	MCC	Analyzed Spokane ABC plan [.1]; email correspondence regarding case strategy [.1].	0.2	\$ 625.00	\$ 125.00		
1/7/2013	MCC	Worked on amended complaint [.4]; began reviewing and analyzing protective agreement [.3]; outlined response letter to Mr. Madden [.6].	1.3	\$ 625.00	\$ 812.50		
1/8/2013	MCC	Worked on letter to Mr. Madden regarding gap time and off-the-clock claims [1.8]; began analyzing proposed protective order issues [.4]; email correspondence regarding amended complaint [.2].	2.4	\$ 625.00	\$ 1,500.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/8/2013	TJM	Worked on amended complaint [.3].	0.3	\$ 675.00	\$ 202.50		
1/9/2013	EBN	Worked on discovery requests.	0.6	\$ 250.00	\$ 150.00		
1/9/2013	MCC	Worked on settlement response letter [3]; analyzed proposed protective order and new local rules regarding protective orders [1.2]; email correspondence regarding new local rules and protective order process [.4]; phone calls with Ms. Hill and class member regarding off-the-clock work during training period [.4]; worked on discovery [.2]; email correspondence regarding amended complaint [.1].	5.3	\$ 625.00	\$ 3,312.50		
1/10/2013	EBN	Worked on discovery requests; served same.	0.8	\$ 250.00	\$ 200.00		
1/10/2013	MCC	Worked on discovery requests, including emails re same [.6]; email correspondence regarding settlement and protective order issues [.2]; worked on proposed amended complaint [.5]; phone call with witness [.4]; worked on settlement letter [1.7].	3.4	\$ 625.00	\$ 2,125.00		
1/11/2013	MCC	Worked on and finalized proposed amended complaint [.2]; phone call with class member/class representative [.2]; email correspondence regarding settlement information [.1].	0.5	\$ 625.00	\$ 312.50		
1/11/2013	TJM	Worked on amended complaint [.2].	0.2	\$ 675.00	\$ 135.00		
1/14/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
1/14/2013	MCC	Conference regarding class representatives [.3]; began reviewing settlement letter and materials from Mr. Madden [.4].	0.7	\$ 625.00	\$ 437.50		
1/14/2013	TJM	Analyzed issues regarding case strategy and possibility of adding another named plaintiff [.3].	0.3	\$ 675.00	\$ 202.50		
1/14/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
1/15/2013	EBN	Revised discovery requests.	0.5	\$ 250.00	\$ 125.00		
1/15/2013	MCC	Worked on discovery requests [.5]; analyzed materials submitted with settlement letter [.4]; email correspondence regarding settlement letter [.1].	1.0	\$ 625.00	\$ 625.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/16/2013	MCC	Worked on revisions of discovery requests and email correspondence regarding discovery strategy [1]; email correspondence with Mr. Madden regarding amended complaint and settlement interest [.2]; email correspondence with class member regarding class claims [.3].	1.5	\$ 625.00	\$ 937.50		
1/17/2013	EBN	Worked on stipulation to file amended complaint.	0.7	\$ 250.00	\$ 175.00		
1/17/2013	MCC	Worked on discovery [1]; worked on stipulation for amended complaint [.3]; analyzed service issues for XBS [.3]; email correspondence regarding amended complaint and discovery [.2].	1.8	\$ 625.00	\$ 1,125.00		
1/22/2013	BKK	Reviewed, revised and finalized stipulation to file first amended complaint; arranged filing and service; reviewed, revised and finalized first amended complaint; prepared draft of and finalized praecipe to issue summons; prepared summons directed to Xerox Business Services, LLC; arranged filing and service.	1.3	\$ 200.00	\$ 260.00		
1/22/2013	EBN	Email to potential class member regarding case status [.2]; worked on finalizing discovery requests [1].	1.2	\$ 250.00	\$ 300.00		
1/22/2013	MCC	Worked on discovery, amended complaint and stipulation; email correspondence regarding same.	0.9	\$ 625.00	\$ 562.50		
1/23/2013	BKK	Reviewed summons issued by court; prepared notice of lawsuit and request for waiver of service; email correspondence to Mr. Madden requesting execution of waiver of service.	1.3	\$ 200.00	\$ 260.00		
1/23/2013	EBN	Served discovery requests on opposing counsel by mail.	0.2	\$ 250.00	\$ 50.00		
1/23/2013	MCC	Analyzed waiver of service issue.	0.1	\$ 625.00	\$ 62.50		
1/24/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
1/24/2013	MCC	Worked on and analyzed necessary information for damages calculations [1]; reviewed and analyzed letter and data from Mr. Madden [.5]; conference regarding settlement strategy [.3].	1.8	\$ 625.00	\$ 1,125.00		
1/24/2013	TJM	Worked on discovery issues [.1]; worked on settlement strategy issues [.3].	0.4	\$ 675.00	\$ 270.00		
1/24/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
1/25/2013	BKK	Reviewed executed waiver of service for Xerox Business Services; arranged filing and service.	0.4	\$ 200.00	\$ 80.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/25/2013	MCC	Worked on damages calculations.	0.9	\$ 625.00	\$ 562.50		
1/28/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
1/28/2013	MCC	Worked on revised damages calculations and settlement letter.	4.2	\$ 625.00	\$ 2,625.00		
1/28/2013	TJM	Telephone call from opposing counsel regarding discovery and settlement [1.2]; worked on damages calculations and settlement strategy [1.7].	1.9	\$ 675.00	\$ 1,282.50		
1/28/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
1/29/2013	MCC	Worked on damages calculations and settlement offer letter.	1.2	\$ 625.00	\$ 750.00		
1/29/2013	TJM	Telephone conference with opposing counsel regarding settlement issues [1.2]; worked on same [1.3].	0.5	\$ 675.00	\$ 337.50		
1/30/2013	MCC	Worked on damages calculations and settlement letter.	2.3	\$ 625.00	\$ 1,437.50		
1/30/2013	TJM	Worked on second demand letter and researched and analyzed issues regarding same [1.2].	1.2	\$ 675.00	\$ 810.00		
1/31/2013	MCC	Worked on settlement offer letter [1.2]; conference regarding settlement offer strategy [1.2]; email correspondence regarding settlement offer [1.1].	1.5	\$ 625.00	\$ 937.50		
1/31/2013	TJM	Worked on settlement demand letter and case strategy issues [1.3].	0.3	\$ 675.00	\$ 202.50		
2/1/2013	MCC	Phone call with co-counsel regarding settlement offer letter [1.3]; worked on settlement offer letter [1.5]; email correspondence regarding offer letter [1.1].	0.9	\$ 625.00	\$ 562.50		
2/4/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
2/4/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
2/5/2013	MCC	Worked on damages spreadsheet.	0.1	\$ 625.00	\$ 62.50		
2/5/2013	TJM	Email correspondence with opposing counsel regarding settlement issues and damages calculations [1.2]; worked on case strategy issues [1.1].	0.3	\$ 675.00	\$ 202.50		
2/6/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
2/11/2013	MCC	Reviewed Defendants' answer to second amended complaint.	0.4	\$ 625.00	\$ 250.00		
2/12/2013	MCC	Analyzed CPA claim issues.	0.1	\$ 625.00	\$ 62.50		
2/13/2013	EBN	Worked on issues regarding service of discovery requests; drafted declaration of service; correspondence regarding same.	0.6	\$ 250.00	\$ 150.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/13/2013	MCC	Analyzed discovery issues.	0.2	\$ 625.00	\$ 125.00		
2/15/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
2/15/2013	MCC	Reviewed and analyzed settlement letter and settlement strategy.	1.1	\$ 625.00	\$ 687.50		
2/15/2013	TJM	Telephone call from co-counsel regarding defendants' settlement offer [.1]; analyzed issues regarding same and settlement strategy [.3].	0.4	\$ 675.00	\$ 270.00		
2/18/2013	MCC	Analyzed mediation strategy.	0.1	\$ 625.00	\$ 62.50		
2/19/2013	MCC	Analyzed mediation issues and drafted letter to Mr. Madden regarding mediation.	0.8	\$ 625.00	\$ 500.00		
2/19/2013	TJM	Analyzed issues regarding mediation [.2].	0.2	\$ 675.00	\$ 135.00		
2/19/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
2/20/2013	EBN	Researched availability of mediators for possible mediation dates; email regarding same.	0.3	\$ 250.00	\$ 75.00		
2/20/2013	MCC	Worked on stipulated protective order.	0.3	\$ 625.00	\$ 187.50		
2/21/2013	MCC	Worked on revisions of stipulated protective order.	0.2	\$ 625.00	\$ 125.00		
2/22/2013	MCC	Worked on revisions of stipulated protective order.	0.8	\$ 625.00	\$ 500.00		
2/25/2013	MCC	Worked on proposed stipulated protective order.	0.2	\$ 625.00	\$ 125.00		
2/25/2013	TJM	Telephone call from opposing counsel regarding settlement issues [.4].	0.4	\$ 675.00	\$ 270.00		
2/26/2013	BKK	Prepared draft of stipulation and proposed order extending class certification briefing deadlines.	0.4	\$ 200.00	\$ 80.00		
2/26/2013	MCC	Analyzed and outlined strategy for settlement and discovery [.3]; worked on stipulation to extend class certification briefing deadlines [.2].	0.5	\$ 625.00	\$ 312.50		
2/26/2013	TJM	Analyzed issues regarding settlement strategy and extension of discovery and case schedule deadlines [.3].	0.3	\$ 675.00	\$ 202.50		
2/27/2013	MCC	Strategy sessions concerning settlement and class certification.	0.7	\$ 625.00	\$ 437.50		
2/27/2013	TJM	Worked on case and settlement strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
2/28/2013	MCC	Worked on stipulation for extension of class certification deadlines, including analysis of new local rule re stipulations [1]; analyzed discovery strategy [.2].	1.2	\$ 625.00	\$ 750.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/1/2013	MCC	Identified key discovery requests for class certification and settlement discussions [.5]; worked on stipulation to extend class certification deadline [.3]; worked on letter to Mr. Madden regarding discovery, settlement discussions, and class certification extension [.6]; email correspondence regarding settlement strategy [.2].	1.6	\$ 625.00	\$ 1,000.00		
3/1/2013	TJM	Worked on case strategy and discovery issues [.3].	0.3	\$ 675.00	\$ 202.50		
3/4/2013	EBN	Left message with mediator's office regarding mediation dates.	0.2	\$ 250.00	\$ 50.00		
3/4/2013	MCC	Received phone call from client regarding case status and mediation [.1]; email correspondence regarding contact by reporter [.1].	0.2	\$ 625.00	\$ 125.00		
3/5/2013	MCC	Phone call with potential class member regarding Lacey call center.	0.3	\$ 625.00	\$ 187.50		
3/6/2013	EBN	Telephone conferences with potential class members regarding case status.	0.6	\$ 250.00	\$ 150.00		
3/6/2013	MCC	Phone call with Mr. Madden regarding discovery and stipulation to extend class certification deadlines [.5]; conference regarding discovery and settlement strategy [.3]; worked on revised stipulation [.4]; analyzed information we need before formal discovery responses [1.5]; analyzed discovery and settlement strategy [.2].	2.9	\$ 625.00	\$ 1,812.50		
3/6/2013	TJM	Prepared for and participated in telephone conference with opposing counsel regarding discovery and settlement issues [1.0]; worked on same [.2].	1.2	\$ 675.00	\$ 810.00		
3/7/2013	EBN	Updated class member contact spreadsheet.	0.8	\$ 250.00	\$ 200.00		
3/7/2013	MCC	Worked on informal discovery requests [1]; analyzed damages for settlement counteroffer [.9]; began drafting text for settlement counteroffer [.6]; email correspondence regarding stipulation and discovery deadline [.2]; conference regarding discovery strategy and settlement strategy [.4]; conference with co-counsel regarding case strategy and gap time claims [.4]; email correspondence regarding case status and strategy [.3].	3.8	\$ 625.00	\$ 2,375.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/7/2013	TJM	Analyzed issues regarding discovery, legal claims, case strategy, and settlement strategy and telephone conference with co-counsel regarding same [1.4].	1.4	\$ 675.00	\$ 945.00		
3/8/2013	MCC	Strategy call regarding discovery, class certification extension, and settlement issues [.5]; analyzed discovery and settlement issues [.3]; worked on informal document request list [.2]; worked on proposed stipulation to extend class certification deadlines [.1].	1.1	\$ 625.00	\$ 687.50		
3/8/2013	TJM	Analyzed issues regarding case and settlement strategy and telephone conference with co-counsel regarding same [.4]; worked on discovery requests and proposed case scheduling amendments [.2].	0.6	\$ 675.00	\$ 405.00		
3/11/2013	MCC	Worked on proposed stipulation and letter regarding discovery [1]; analyzed issues relating to additional payment types in preparation for call with opposing counsel [.2]; call with opposing counsel regarding additional payment types [.8]; conference regarding strategy for settlement offer [.5]; worked on damages calculations with reduction for partial incentive pay [.4]; email correspondence regarding settlement issues [.2]; conference regarding settlement strategy [.3].	3.4	\$ 625.00	\$ 2,125.00		
3/11/2013	TJM	Worked on letter to opposing counsel regarding discovery requests and analyzed issues regarding same [.2]; telephone conference with opposing counsel regarding factual background issues [1.0]; worked on case and settlement strategy issues [.6].	1.8	\$ 675.00	\$ 1,215.00		
3/12/2013	MCC	Researched gap time claims in other jurisdictions [2.4]; worked on letter to Mr. Madden regarding settlement counteroffer [.9].	3.3	\$ 625.00	\$ 2,062.50		
3/12/2013	TJM	Researched and analyzed issues regarding failure to pay for all hours worked on ground that productive pay covers non-productive work time [.9]; worked on settlement letter to opposing counsel [.2]..	1.1	\$ 675.00	\$ 742.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/13/2013	EBN	Finalized and forwarded letter to Mr. Madden regarding settlement offer [.3]; worked on class member contact spreadsheet [.1]; email to potential class member regarding case status [.1].	0.5	\$ 250.00	\$ 125.00		
3/13/2013	MCC	Email correspondence regarding settlement letter [.1]; analyzed settlement strategy [.1]; email correspondence and review of case law on gap time issue [.2].	0.4	\$ 625.00	\$ 250.00		
3/13/2013	TJM	Analyzed issues regarding communications with witnesses [.1]; analyzed issues regarding case strategy [.1].	0.2	\$ 675.00	\$ 135.00		
3/14/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
3/14/2013	MCC	Email correspondence regarding gap time claims and research [.3]; phone calls with class members regarding claims [.5]; long phone call with Mr. Madden regarding discovery issues and stipulation and post-call conference with Mr. Marshall [1.8].	2.6	\$ 625.00	\$ 1,625.00		
3/14/2013	TJM	Telephone conference with opposing counsel regarding discovery and settlement issues [1.9]; worked on same [.2].	2.1	\$ 675.00	\$ 1,417.50		
3/14/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
3/15/2013	EBN	Email to class member regarding case update; updated contact information in class member spreadsheet [.2].	0.2	\$ 250.00	\$ 50.00		
3/15/2013	MCC	Worked on revisions of stipulation, discovery issues, and emails regarding same.	1.6	\$ 625.00	\$ 1,000.00		
3/18/2013	MCC	Analyzed issues regarding changes to stipulation.	0.2	\$ 625.00	\$ 125.00		
3/19/2013	TJM	Reviewed time records and analyzed issues regarding factual background [.1].	0.1	\$ 675.00	\$ 67.50		
3/20/2013	BKK	Reviewed, revised and finalized stipulation and proposed order extending briefing deadlines regarding motion for class certification; arranged filing and service of same; email correspondence to chambers transmitting same.	0.4	\$ 200.00	\$ 80.00		
3/20/2013	MCC	Email correspondence regarding stipulation.	0.2	\$ 625.00	\$ 125.00		
3/20/2013	TJM	Analyzed issues regarding factual background [.3].	0.3	\$ 675.00	\$ 202.50		
3/24/2013	MCC	Analyzed settlement letter.	0.2	\$ 625.00	\$ 125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/25/2013	MCC	Analyzed settlement offer by defendants [.2]; worked on calculations for counter-offer [.6]; email correspondence regarding counter-offer plan [.4].	1.2	\$ 625.00	\$ 750.00		
3/25/2013	TJM	Reviewed defendants' counterproposal to settlement offer and analyzed issues regarding same [.3]; email to co-counsel regarding same [.1]; analyzed issues regarding witness interviews and email correspondence with co-counsel regarding same [.2]; worked on settlement issues [.2].	0.8	\$ 675.00	\$ 540.00		
3/26/2013	MCC	Reviewed order on class certification deadlines; email correspondence regarding class certification.	0.2	\$ 625.00	\$ 125.00		
3/27/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
3/28/2013	MCC	Worked on settlement offer calculations and settlement letter.	0.9	\$ 625.00	\$ 562.50		
4/1/2013	MCC	Analyzed settlement issues.	0.1	\$ 625.00	\$ 62.50		
4/2/2013	EBN	Finalized and forwarded letter to opposing counsel regarding settlement offer.	0.3	\$ 250.00	\$ 75.00		
4/2/2013	MCC	Worked on and finalized settlement letter [.2]; worked on draft protective order [.6].	0.8	\$ 625.00	\$ 500.00		
4/2/2013	TJM	Worked on response to defendants' most recent counteroffer [.1].	0.1	\$ 675.00	\$ 67.50		
4/3/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
4/4/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
4/4/2013	MCC	Email correspondence regarding protective order.	0.1	\$ 625.00	\$ 62.50		
4/5/2013	MCC	Worked on protective order revisions; email correspondence regarding same.	0.3	\$ 625.00	\$ 187.50		
4/8/2013	MCC	Phone call with Ms. Hill regarding case status [.2]; email correspondence regarding informal discovery [.1].	0.3	\$ 625.00	\$ 187.50		
4/11/2013	MCC	Email correspondence with opposing counsel regarding informal discovery.	0.1	\$ 625.00	\$ 62.50		
4/17/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
4/17/2013	MCC	Email correspondence regarding mediation, informal discovery, and gap time issue [.3]; analyzed gap time legal issues [.4]; phone call with co-counsel regarding mediation and case strategy [.4].	1.1	\$ 625.00	\$ 687.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/18/2013	EBN	Telephone conference with class member regarding case status; email regarding same; letters to class members regarding consent to join forms; updated class member contact database.	1.0	\$ 250.00	\$ 250.00		
4/18/2013	MCC	Researched case law on protective order applicability to multiple related cases [.2]; email correspondence with opposing counsel regarding Douglas language in protective order [.2].	0.4	\$ 625.00	\$ 250.00		
4/22/2013	EBN	Worked on file organization.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
4/22/2013	MCC	Analyzed protective order and inspection issues [.6]; conference regarding case strategy before call with opposing counsel [.3]; phone call with opposing counsel regarding inspection and protective order [.7]; worked on protective order [.6]; analyzed new class certification case law in light of Mr. Madden's letter [.5]; email correspondence regarding mediation and gap time briefing [.3]; analyzed strategy for mediation and damages presentation [.4].	3.4	\$ 625.00	\$ 2,125.00		
4/22/2013	TJM	Worked on discovery issues [.1].	0.1	\$ 675.00	\$ 67.50		
4/22/2013	TJM	Analyzed issues regarding discovery, settlement, and case strategy [.3]; telephone conference with opposing counsel regarding site inspection and protective order [.7].	1.0	\$ 675.00	\$ 675.00		
4/23/2013	MCC	Phone conference with co-counsel regarding settlement strategy, mediation and gap time issue [.4]; phone call with opposing counsel regarding inspection and protective order [.6].	1.0	\$ 625.00	\$ 625.00		
4/23/2013	TJM	Telephone conference with co-counsel regarding case strategy issues [.9]; reviewed documents from class member and email correspondence with co-counsel regarding same [.2].	1.1	\$ 675.00	\$ 742.50		
4/24/2013	MCC	Email correspondence regarding mediation and inspection [.1]; analyzed documents from Spokane class member [.3].	0.4	\$ 625.00	\$ 250.00		
4/25/2013	EBN	Telephone conference with potential class member regarding dispute resolution plan [.1]; email to potential class member regarding same [.1].	0.2	\$ 250.00	\$ 50.00		
4/26/2013	EBN	Telephone conference with Stew Cogan's office regarding date for mediation; correspondence regarding same.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/26/2013	MCC	Email correspondence regarding mediation [.3]; analyzed protective order issues [.2].	0.5	\$ 625.00	\$ 312.50		
4/26/2013	TJM	Worked on mediation and settlement strategy issues and email correspondence with co-counsel regarding same [.5].	0.5	\$ 675.00	\$ 337.50		
4/29/2013	HJB	Call with client regarding meeting and information for interrogatory responses.	0.5	\$ 150.00	\$ 75.00		
4/29/2013	MCC	Email correspondence regarding mediation [.2]; worked on protective order [.8]; reviewed interrogatory responses and production from Xerox [1.1].	2.1	\$ 625.00	\$ 1,312.50		
4/29/2013	TJM	Analyzed issues regarding selection of mediator and related issues [.1].	0.1	\$ 675.00	\$ 67.50		
4/30/2013	EBN	Telephone conference with potential class member regarding case status [.2]; worked on docketing [.1]; worked on file organization [.1]; personal conference regarding document review and indexing [.1]; updated production log [.1].	0.6	\$ 250.00	\$ 150.00	\$ 100.00	0.4
4/30/2013	MCC	Reviewed discovery responses [.4]; summarized deficiencies in discovery responses and proposed game plan to respond [.5]; analyzed new data for damages calculations [.2]; phone call with client regarding mediation [.2]; email correspondence regarding mediation, discovery issues, and protective order [.2]; worked on protective order [.2].	1.7	\$ 625.00	\$ 1,062.50		
4/30/2013	TJM	Worked on discovery and case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
4/30/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
5/1/2013	EBN	Updated class member contact spreadsheet.	0.4	\$ 250.00	\$ 100.00		
5/1/2013	MCC	Phone call with potential class member regarding recent issues in Lacey call center and legal claims [.8]; reviewed and analyzed email from Mr. Madden regarding restrictions on inspection [.1].	0.9	\$ 625.00	\$ 562.50		
5/1/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
5/2/2013	EBN	Correspondence regarding class member calls.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/2/2013	MCC	Analyzed Rule 34 case law in light of Mr. Madden's proposed restrictions on inspection [1]; strategy call with co-counsel regarding inspection, mediation and summary judgment [.8]; worked on damages calculations with new data provided in interrogatory responses [2]; drafted email to Mr. Madden regarding inspection [.3]; phone call with Ms. Hill regarding inspection and mediation [.3]; analyzed arguments for summary judgment [.5].	4.9	\$ 625.00	\$ 3,062.50		
5/2/2013	TJM	Telephone conference with co-counsel regarding case strategy and factual background issues and worked on same [1.2].	1.2	\$ 675.00	\$ 810.00		
5/3/2013	MCC	Worked on damages calculations in light of new data [.9]; email correspondence regarding damages, inspection, and contact with Mr. Madden [.3]; conference regarding strategy for mediation [.1]; phone call with class member and witness regarding Federal Way call center issues [.5].	1.8	\$ 625.00	\$ 1,125.00		
5/6/2013	EBN	Updated class member contact spreadsheet [.2].	0.2	\$ 250.00	\$ 50.00		
5/6/2013	MCC	Prepared list of issues to cover in inspection of Federal Way Call Center [.7]; inspection of Federal Way Call Center, including travel time [3.5]; worked on outline of mediation letter [1.5]; worked on declaration template for class members [.9].	6.6	\$ 625.00	\$ 4,125.00		
5/7/2013	MCC	Email correspondence regarding mediation and witnesses; research regarding damages.	0.3	\$ 625.00	\$ 187.50		
5/8/2013	EBN	Worked on summary of class members to contact regarding card swipe data.	0.5	\$ 250.00	\$ 125.00		
5/8/2013	HJB	Production Index - documented bates labels with brief description.	0.5	\$ 150.00	\$ 75.00	\$ 75.00	0.5
5/8/2013	MCC	Worked on outline of mediation letter [2.5]; reviewed and analyzed evidence of wage violations in preparation for mediation letter [1]; email correspondence regarding evidence of wage violations, mediation and class member declarations [.6]; reviewed letter from mediator regarding shadow [.1].	4.2	\$ 625.00	\$ 2,625.00		
5/8/2013	TJM	Worked on discovery issues [.5].	0.5	\$ 675.00	\$ 337.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/9/2013	EBN	Reviewed documents regarding ABC plan for mediation brief; revised production index.	1.0	\$ 250.00	\$ 250.00		
5/9/2013	MCC	Phone call with class member witness regarding timekeeping systems [.6]; reviewed Xerox's discovery production [.6]; email correspondence regarding ABC plans [.3]; worked on mediation letter, including research and review of evidence [5].	6.5	\$ 625.00	\$ 4,062.50		
5/10/2013	EBN	Correspondence with class members regarding pay summaries; updated class member contact database.	1.5	\$ 250.00	\$ 375.00		
5/10/2013	MCC	Worked on mediation brief and damages calculations.	6.4	\$ 625.00	\$ 4,000.00		
5/10/2013	TJM	Worked on case strategy and mediation issues [.7].	0.7	\$ 675.00	\$ 472.50		
5/11/2013	TJM	Analyzed issues regarding Texas case, mediation, and damages calculations [.3].	0.3	\$ 675.00	\$ 202.50		
5/13/2013	MCC	Worked on mediation letter [3.7]; worked on damages calculations [1.2]; worked on card swipe data discovery and emails regarding same [.5]; email correspondence regarding settlement offer [.4].	5.8	\$ 625.00	\$ 3,625.00		
5/13/2013	TJM	Worked on discovery, factual background, and case strategy issues [2.2].	2.2	\$ 675.00	\$ 1,485.00		
5/14/2013	EBN	Updated production log [.1]; worked on issues regarding card swipe data for sample group of class members; telephone conference with class members regarding same; email regarding same [1.4].	1.5	\$ 250.00	\$ 375.00		
5/14/2013	JJB	Worked on damages calculations for mediation and personal conferences regarding same [3.7].	3.7	\$ 250.00	\$ 925.00		
5/14/2013	MCC	Worked on mediation letter [1.4]; worked on private mediation letter [1.3]; worked on damages calculations and meetings regarding same [1.5]; email correspondence regarding settlement offer [.4].	4.6	\$ 625.00	\$ 2,875.00		
5/15/2013	EBN	Correspondence regarding FEPS pay summary; email to class member regarding Kent call center [.2]; worked on file organization [.1]; worked on exhibits for mediation letter [1.5].	1.8	\$ 250.00	\$ 450.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/15/2013	MCC	Worked on mediation letters [1.3]; worked on damages calculations [.3]; began reviewing Xerox's latest production [.2]; phone call with Mr. Johnson regarding mediation strategy [.2]; drafted settlement offer email [.2]; analyzed evidence needed for summary judgment [.1].	2.3	\$ 625.00	\$ 1,437.50		
5/15/2013	TJM	Worked on confidential mediation submission [.3].	0.3	\$ 675.00	\$ 202.50		
5/16/2013	EBN	Finalized mediation letters; served same [1.2]; email correspondence and telephone conferences with class members regarding documents [.4]; reviewed most recent document production; email regarding same [2].	3.6	\$ 250.00	\$ 900.00		
5/16/2013	MCC	Worked on mediation letters and exhibits [2]; reviewed Xerox's mediation letter and exhibits [.7]; began outlining issues for summary judgment motion [.6]; phone call with Mr. Johnson regarding mediation strategy [.4]; conference regarding mediation strategy [.2]; email correspondence regarding settlement offer [.3]; reviewed and analyzed recent class certification case law in preparation for mediation [1].	5.2	\$ 625.00	\$ 3,250.00		
5/16/2013	TJM	Analyzed issues regarding mediation and settlement strategy [.2].	0.2	\$ 675.00	\$ 135.00		
5/17/2013	MCC	Analyzed additional damages claims for unpaid defined activity time [.6]; email correspondence regarding Spokane evidence [.2]; worked on summary judgment motion [4.8].	5.6	\$ 625.00	\$ 3,500.00		
5/18/2013	TJM	Worked on factual background and case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
5/20/2013	MCC	Analyzed damages issues and legal issues in preparation for mediation [1]; worked on motion for partial summary judgment [4.5].	5.5	\$ 625.00	\$ 3,437.50		
5/21/2013	BKK	Reviewed and revised plaintiff's motion for partial summary judgment.	0.9	\$ 200.00	\$ 180.00		
5/21/2013	EBN	Updated class member contact spreadsheet [.3]; email to class member regarding documents [.1].	0.4	\$ 250.00	\$ 100.00		
5/21/2013	MCC	Analyzed materials from Alvarez and SPEEA case supporting per-hour approach to minimum wage compliance [.9]; phone call with Mr. Mark regarding Alvarez materials and per-hour approach [.3].	1.2	\$ 625.00	\$ 750.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/22/2013	EBN	Downloaded software for document production; loaded document production; reviewed documents; email regarding same; personal conference regarding production for co-counsel.	3.0	\$ 250.00	\$ 750.00		
5/22/2013	JJB	Worked on damages calculations [.1].	0.1	\$ 250.00	\$ 25.00		
5/22/2013	MCC	Phone call with potential class member regarding L&I's per-hour approach to minimum wage compliance [.3]; phone call with Dan Johnson regarding mediation [.2]; prepared for mediation [.8]; worked on summary judgment motion [6.7].	8.0	\$ 625.00	\$ 5,000.00		
5/22/2013	TJM	Analyzed issues regarding motion for summary judgment and case strategy [.5]; analyzed issues regarding mediation strategy [.4].	0.9	\$ 675.00	\$ 607.50		
5/23/2013	EBN	Updated production log.	0.2	\$ 250.00	\$ 50.00		
5/23/2013	MCC	Reviewed documents and case law in preparation for mediation [.6]; met with co-counsel in preparation for mediation [.2]; mediation and travel time to return to office [5.8]; conferences regarding case strategy [.3].	6.9	\$ 625.00	\$ 4,312.50		
5/23/2013	TJM	Analyzed issues regarding mediation and case strategy for class certification and summary judgment [.4].	0.4	\$ 675.00	\$ 270.00		
5/26/2013	MCC	Researched one-way intervention issues in preparation for summary judgment motion.	1.5	\$ 625.00	\$ 937.50		
5/28/2013	MCC	Reviewed 9th Circuit case on class certification; email correspondence regarding same.	0.4	\$ 625.00	\$ 250.00		
5/30/2013	MCC	Reviewed letter from mediator; email correspondence regarding mediation fee.	0.2	\$ 625.00	\$ 125.00		
5/31/2013	MCC	Email correspondence regarding mediation [.1]; meeting with Kent class member [1].	1.1	\$ 625.00	\$ 687.50		
6/3/2013	MCC	Analyzed discovery issues and need for additional discovery.	0.8	\$ 625.00	\$ 500.00		
6/4/2013	JJB	Personal conference regarding ESI; researched user authentication.	1.1	\$ 250.00	\$ 275.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
6/4/2013	MCC	Analyzed discovery requests to determine if additional requests are necessary in preparation for class certification [1]; analyzed ESI issues and prepared and reviewed ESI protocol [.7]; conference regarding discovery issues and ESI [.9]; drafted email to opposing counsel regarding ESI protocol and discovery conference [.3]; email correspondence with potential class member regarding Kent call center [.1]; reviewed faxes from potential class member [.2].	3.2	\$ 625.00	\$ 2,000.00		
6/5/2013	BKK	Prepared draft of Lynn Buchanan declaration.	0.2	\$ 200.00	\$ 40.00		
6/5/2013	JJB	Worked on discovery issues; personal conference and research regarding user authentication.	0.4	\$ 250.00	\$ 100.00		
6/5/2013	MCC	Researched and analyzed one-way intervention issue [1.2]; phone call with co-counsel regarding motion for summary judgment, discovery and case strategy [.5]; worked on protective order [.5]; phone call with Mr. Nunn regarding protective order [.2]; meetings regarding ESI, including NT login, and protective order issues [.5]; email correspondence regarding discovery and protective order issues [.2]; worked on discovery [.4].	3.5	\$ 625.00	\$ 2,187.50		
6/6/2013	JJB	Continued work on discovery; personal conference and correspondence regarding same.	0.1	\$ 250.00	\$ 25.00		
6/6/2013	MCC	Worked on class member declaration [.9]; worked on search term issues for discovery [.4]; phone calls with class members [.7]; researched class certification issues [.8].	2.8	\$ 625.00	\$ 1,750.00		
6/7/2013	EBN	Updated class member contact database.	0.3	\$ 250.00	\$ 75.00		
6/7/2013	JJB	Continued work on discovery.	0.8	\$ 250.00	\$ 200.00		
6/10/2013	MCC	Email correspondence regarding discovery issues and protective order; reviewed protective order.	0.2	\$ 625.00	\$ 125.00		
6/11/2013	JJB	Telephone conference with opposing counsel regarding ESI protocol; personal conference regarding same.	0.6	\$ 250.00	\$ 150.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
6/11/2013	MCC	Prepared for ESI conference call and participated in conference call [1]; analyzed ESI issues that still need answers [1]; email correspondence with opposing counsel regarding ESI issues [.3]; reviewed and analyzed protective order and related issues and email correspondence regarding same [.3]; analyzed discovery issues [.6].	3.2	\$ 625.00	\$ 2,000.00		
6/12/2013	MCC	Phone calls with class members [.7]; email correspondence with opposing counsel regarding ESI issues [.6].	1.3	\$ 625.00	\$ 812.50		
6/13/2013	MCC	Analyzed ESI and protective order issues [.3]; email correspondence regarding same [.2]; revised protective order motion [.1].	0.6	\$ 625.00	\$ 375.00		
6/14/2013	BKK	Reviewed attorney Nunn notice of appearance; amended master certificate of service.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
6/14/2013	EBN	Worked on production index.	0.9	\$ 250.00	\$ 225.00		
6/14/2013	MCC	Began reviewing time cards from class member [.3]; analyzed model ESI protocol and ESI issues in preparation for proposal to Defendants [.5]; email correspondence regarding ESI and service issues [.1].	0.9	\$ 625.00	\$ 562.50		
6/15/2013	MCC	Email correspondence with class representative and potential class member regarding case issues.	0.2	\$ 625.00	\$ 125.00		
6/15/2013	MCC	Email correspondence regarding email service, custodians and search terms [.2]; analyzed ESI issues [.3].	0.5	\$ 625.00	\$ 312.50		
6/17/2013	MCC	Reviewed service rules [.2]; analyzed discovery issues [.2]; began reviewing discovery responses [.2].	0.6	\$ 625.00	\$ 375.00		
6/18/2013	MCC	Reviewed Defendants' discovery responses.	0.8	\$ 625.00	\$ 500.00		
6/19/2013	EBN	Worked on document production index.	3.3	\$ 250.00	\$ 825.00		
6/19/2013	JJB	Download and prepare load file; loaded production into Concordance; updated production log; reviewed discovery responses.	3.2	\$ 250.00	\$ 800.00		
6/19/2013	MCC	Reviewed discovery responses [.7]; phone call with witness regarding claims in case and Kent call center procedures [.4].	1.1	\$ 625.00	\$ 687.50		
6/19/2013	TJM	Worked on discovery and case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
6/20/2013	JJB	Continued working on Concordance load.	0.4	\$ 250.00	\$ 100.00		
6/20/2013	MCC	Began reviewing discovery responses and objections from Defendants.	0.7	\$ 625.00	\$ 437.50		
6/20/2013	TJM	Worked on discovery issues [.2].	0.2	\$ 675.00	\$ 135.00		
6/21/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
6/21/2013	EBN	Telephone conference with potential class member regarding Kent call center.	0.7	\$ 250.00	\$ 175.00		
6/21/2013	JJB	Personal confernce regarding electronic discovery and production; drafted discovery letter.	1.3	\$ 250.00	\$ 325.00		
6/21/2013	MCC	Continued reviewing Defendants' discovery responses and highlighting deficiencies [3]; email correspondence and conference regarding ESI production [.4]; reviewed documents produced by Defendants [.3].	3.7	\$ 625.00	\$ 2,312.50		
6/21/2013	TJM	Analyzed issues regarding communications with class members [.2].	0.2	\$ 675.00	\$ 135.00		
6/24/2013	MCC	Analyzed discovery issues.	0.1	\$ 625.00	\$ 62.50		
6/24/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
6/25/2013	JJB	Reviewed search terms [.1]; telephone conference regarding electronic discovery [.3].	0.4	\$ 250.00	\$ 100.00		
6/25/2013	MCC	Reviewed documents in preparation for meeting with class member [.5]; analyzed discovery issues [.1]; meeting with class member, including travel time [3.3].	3.9	\$ 625.00	\$ 2,437.50		
6/25/2013	TJM	Worked on strategy for class certification [.3]; analyzed issues regarding protective order [.1].	0.4	\$ 675.00	\$ 270.00		
6/26/2013	JJB	Reviewed Defendant's production and discovery responses; completed drafting discovery letter.	2.1	\$ 250.00	\$ 525.00		
6/26/2013	MCC	Conferences regarding ESI discovery issues [.7]; reviewed production [.2]; worked on letter regarding ESI issues [.6].	1.5	\$ 625.00	\$ 937.50		
6/26/2013	TJM	Worked on factual background and discovery issues [.4].	0.4	\$ 675.00	\$ 270.00		
6/27/2013	BKK	Retrieved related order in Smiley v. E.I. Du Pont.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
6/27/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
6/27/2013	JJB	Wored on search term and electronic discovery issues; personal conferences and correspondence regarding same; revised discovery letter.	2.8	\$ 250.00	\$ 700.00		
6/27/2013	MCC	Worked on lengthy email regarding search terms and custodians, including research regarding duty to identify custodians [1.1]; worked on ESI letter [1.2]; conferences regarding ESI, discovery issues and Buchanan declaration [1.8]; worked on Buchanan declaration [1.5]; continued reviewing production and analyzing documents [1.4].	5.0	\$ 625.00	\$ 3,125.00		
6/28/2013	JJB	Downloaded production; prepared load file for Concordance; loaded production into Concordance; updated production log; worked on search terms.	2.1	\$ 250.00	\$ 525.00		
6/28/2013	MCC	Worked on discovery deficiency letter.	0.8	\$ 625.00	\$ 500.00		
7/1/2013	MCC	Email correspondence regarding production issues [1.2]; worked on letter regarding deficiencies in Defendants' discovery responses [2.4]; reviewed email regarding custodians [1.1].	2.7	\$ 625.00	\$ 1,687.50		
7/1/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
7/2/2013	JJB	Reviewed discovery correspondence; prepared and loaded Defendant's production into Concordance.	1.9	\$ 250.00	\$ 475.00		
7/2/2013	MCC	Reviewed production [1.8]; reviewed discovery answers and worked on detailed discovery letter [2.1]; phone call with Stew Cogan regarding mediation and case issues [1.4].	4.3	\$ 625.00	\$ 2,687.50		
7/2/2013	TJM	Reviewed document production and analyzed issues regarding same and factual background [1.3]; worked on search term issues [1.2].	1.5	\$ 675.00	\$ 1,012.50		
7/3/2013	EBN	Finalized and forwarded discovery letter to opposing counsel [1.5]; created discovery tracking log [1.5].	1.0	\$ 250.00	\$ 250.00		
7/3/2013	MCC	Worked on discovery letter and continued reviewing production.	2.4	\$ 625.00	\$ 1,500.00		
7/5/2013	MCC	Reviewed and analyzed Judge Coughenour's recent order in wage and hour class action in preparation for drafting class certification briefing.	0.9	\$ 625.00	\$ 562.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/8/2013	MCC	Worked on search terms [1]; worked on custodian identification [1]; worked on response to Mr. Nunn's email regarding custodians [.4].	2.4	\$ 625.00	\$ 1,500.00		
7/8/2013	TJM	Telephone conference with co-counsel regarding discovery and case strategy issues [.1].	0.1	\$ 675.00	\$ 67.50		
7/9/2013	JJB	Personal conference regarding discovery; revised proposed search terms.	1.5	\$ 250.00	\$ 375.00		
7/9/2013	MCC	Conference regarding class certification plan and strategy [.8]; worked on search terms, custodians and other discovery issues [.7]	1.5	\$ 625.00	\$ 937.50		
7/9/2013	TJM	Analyzed issues regarding strategy for class certification, including necessary expert work, discovery, and witness testimony [.6].	0.6	\$ 675.00	\$ 405.00		
7/10/2013	EBN	Correspondence regarding Defendants' production and indexing.	0.2	\$ 250.00	\$ 50.00		
7/10/2013	HKO	Indexed defendant production.	1.0	\$ 150.00	\$ 150.00	\$ 150.00	1.0
7/10/2013	JJB	Worked on production issues [.1].	0.1	\$ 250.00	\$ 25.00		
7/11/2013	EBN	Updated class member contact spreadsheet.	1.0	\$ 250.00	\$ 250.00		
7/11/2013	JJB	Updated production log. Worked on production issues.	0.2	\$ 250.00	\$ 50.00		
7/11/2013	MCC	Worked on discovery issues.	0.3	\$ 625.00	\$ 187.50		
7/12/2013	MCC	Prepared for 26(f) conference [1.4]; analyzed search terms and custodians [.6]; researched class list entitlement [.6]; 26(f) conference [2]; post-conference strategy conferences [1]; analyzed proposed class member communication protocol [.1].	5.7	\$ 625.00	\$ 3,562.50		
7/12/2013	TJM	Analyzed issues regarding Rule 26(f) conference [.6]; participated in same [2.0]; worked on issues regarding same [.2].	2.8	\$ 675.00	\$ 1,890.00		
7/14/2013	MCC	Analyzed search terms and custodians [.4]; worked on discovery strategy and class certification strategy and prepared for co-counsel meeting [.8].	1.2	\$ 625.00	\$ 750.00		
7/14/2013	TJM	Worked on search terms issues [.2].	0.2	\$ 675.00	\$ 135.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/15/2013	MCC	Prepared for co-counsel meeting regarding Hill case [1]; meeting regarding Hill case [1.2]; email correspondence regarding discovery issues and search terms [.3]; edited and proposed revised communication protocol language [.2]; worked on search terms [.1].	2.8	\$ 625.00	\$ 1,750.00		
7/15/2013	TJM	Meeting with co-counsel regarding factual background and legal issues, discovery issues, and strategy for class certification [1.1]; analyzed issues regarding class member communications [.1].	1.2	\$ 675.00	\$ 810.00		
7/16/2013	EBN	Received call from potential class member.	0.4	\$ 250.00	\$ 100.00		
7/16/2013	JJB	Telephone conference with consultant regarding authentication logs; personal conference regarding same.	0.7	\$ 250.00	\$ 175.00		
7/16/2013	MCC	Worked on response to Mr. Nunn regarding custodians and search terms [.5]; email correspondence with co-counsel and with opposing counsel regarding discovery conference [.2]; finalized draft Buchanan declaration and emailed Ms. Sharma regarding same[.6]; analyzed class member communication protocol issues [.1]; phone conference with IT specialist regarding computer log-in data [.5].	1.9	\$ 625.00	\$ 1,187.50		
7/17/2013	MCC	Email correspondence with Suchi Sharma regarding Buchanan declaration [.1]; worked on revisions to class member contact protocol [.2].	0.3	\$ 625.00	\$ 187.50		
7/18/2013	MCC	Reviewed documents produced by defendants [.3]; analyzed privilege log deadlines [.2]; email correspondence regarding privilege log [.2]; long phone call with class member [.7].	1.4	\$ 625.00	\$ 875.00		
7/18/2013	TJM	Reviewed document production and analyzed issues regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
7/19/2013	MCC	Phone call with former Federal Way employee regarding wage claims [.6]; analyzed class member communication protocol [.2]; email correspondence regarding class member communication protocol [.1]; analyzed strategy for class certification [.2].	1.1	\$ 625.00	\$ 687.50		
7/21/2013	MCC	Reviewed and organized evidence for class certification.	0.1	\$ 625.00	\$ 62.50		
7/22/2013	EBN	Worked on file organization [.1]; Worked on docketing [.1].	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/22/2013	MCC	Prepared for meet and confer discovery conference [.7]; meet and confer discovery conference [1.5]; conference regarding discovery strategy [.5]; continued reviewing discovery responses and documents produced [.2].	2.9	\$ 625.00	\$ 1,812.50		
7/22/2013	TJM	Prepared for and participated in discovery conference with opposing counsel [1.8]; analyzed issues regarding same [.3].	2.1	\$ 675.00	\$ 1,417.50		
7/23/2013	MCC	Phone call with Ms. Hill regarding discovery requests [.1]; reviewed letter from Mr. Nunn regarding electronic discovery [.1].	0.2	\$ 625.00	\$ 125.00		
7/23/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
7/24/2013	MCC	Email correspondence regarding discovery issues [.2]; continued reviewing letter and analyzing Bates identification to locate most important electronic data [.2].	0.4	\$ 625.00	\$ 250.00		
7/25/2013	HJB	Calls with potential class member and Ms. Hill.	0.5	\$ 150.00	\$ 75.00		
7/25/2013	MCC	Worked on responses and objections to Defendants' discovery requests.	3.0	\$ 625.00	\$ 1,875.00		
7/26/2013	EBN	Telephone conference with potential class member.	0.5	\$ 250.00	\$ 125.00		
7/26/2013	HJB	Call with Tiffany Hill.	0.2	\$ 150.00	\$ 30.00		
7/26/2013	MCC	Worked on discovery responses.	1.9	\$ 625.00	\$ 1,187.50		
7/26/2013	TJM	Worked on discovery issues [.3].	0.3	\$ 675.00	\$ 202.50		
7/27/2013	MCC	Reviewed and analyzed correspondence from defendants' counsel regarding discovery issues [.4]; email correspondence regarding strategy for response to defendants' letters and positions [.4].	0.8	\$ 625.00	\$ 500.00		
7/28/2013	TJM	Worked on strategy for class certification [.2].	0.2	\$ 675.00	\$ 135.00		
7/29/2013	MCC	Long phone call with Ms. Hill regarding discovery responses [1.1]; worked on discovery responses [1.8]; worked on letter to Mr. Nunn regarding class list [.4].	3.3	\$ 625.00	\$ 2,062.50		
7/30/2013	EBN	Updated class member contact spreadsheet; email to Mr. Cote regarding intake call from class member.	0.5	\$ 250.00	\$ 125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/30/2013	MCC	Worked on letter to Mr. Nunn regarding class list, including research and analysis of protective order [.9]; worked on Ms. Hill's discovery responses [2.5]; worked on discovery issues, including email correspondence regarding documents and data [.5].	3.9	\$ 625.00	\$ 2,437.50		
8/1/2013	MCC	Worked on letter to Mr. Nunn regarding class list.	0.1	\$ 625.00	\$ 62.50		
8/2/2013	EBN	Telephone conference with Oregon employee regarding lawsuit; email to potential class member regarding same; email to Mr. Cote regarding referral for unemployment claim issue.	0.5	\$ 250.00	\$ 125.00		
8/2/2013	MCC	Email correspondence regarding discovery issues and statements from workers [.2]; conference regarding discovery and class certification strategy [1].	1.2	\$ 625.00	\$ 750.00		
8/2/2013	TJM	Analyzed issues regarding factual background and strategy for class certification [.7].	0.7	\$ 675.00	\$ 472.50		
8/4/2013	MCC	Email correspondence regarding discovery and class certification; review of documents.	0.3	\$ 625.00	\$ 187.50		
8/5/2013	EBN	Finalized and forwarded letter to opposing counsel.	0.4	\$ 250.00	\$ 100.00		
8/5/2013	JJB	Correspondence regarding data production [.1].	0.1	\$ 250.00	\$ 25.00		
8/5/2013	MCC	Worked on letter to Mr. Nunn regarding class list [.3]; email correspondence regarding discovery issues [.2]; worked on discovery responses [1.4].	1.9	\$ 625.00	\$ 1,187.50		
8/7/2013	EBN	Correspondence regarding document production and privilege log.	0.2	\$ 250.00	\$ 50.00		
8/7/2013	MCC	Worked on discovery responses.	1.0	\$ 625.00	\$ 625.00		
8/8/2013	MCC	Conference regarding class certification strategy [.2]; email correspondence regarding potential class members [.2].	0.4	\$ 625.00	\$ 250.00		
8/8/2013	TJM	Worked on discovery, factual background, and class certification issues [.3].	0.3	\$ 675.00	\$ 202.50		
8/9/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
8/9/2013	MCC	Analyzed class certification strategy.	0.1	\$ 625.00	\$ 62.50		
8/9/2013	TJM	Worked on factual background and case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
8/12/2013	BCH	Reviewed and analyzed case materials [.7].	0.5	\$ 450.00	\$ 225.00		
8/12/2013	EBN	Email to class member regarding case status.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/12/2013	MCC	Analyzed search term response from Mr. Nunn [.4]; identified requests for production for which we want responsive email [.4]; reviewed and analyzed potential limitations to search terms [.8]; analyzed claims for class certification [.6].	2.2	\$ 625.00	\$ 1,375.00		
8/12/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
8/13/2013	BKK	Reviewed court docket and pulled related pleadings.	0.3	\$ 200.00	\$ 60.00		
8/13/2013	BKK	Prepared draft and finalized TMDW notice of change of address; arranged filing and service.	0.3	\$ 200.00	\$ 60.00		
8/13/2013	MCC	Researched issues relating to "responsiveness" review of documents identified through keyword searches [.7]; analyzed issues relating to discovery and search terms [.3].	1.0	\$ 625.00	\$ 625.00		
8/13/2013	MCC	Researched recent class certification decisions in preparation for developing class certification motion strategy [.7]; meeting regarding search terms for discovery [.9]; conference regarding search terms and email production [.2].	1.8	\$ 625.00	\$ 1,125.00		
8/13/2013	TJM	Worked on discovery issues [.2].	0.2	\$ 675.00	\$ 135.00		
8/14/2013	MCC	Worked on class certification plan [3.2]; reviewed documents and data for class certification motion [1]; worked on declaration template for class members [.5]; worked on Ms. Hill's discovery responses [.3]; meeting regarding class certification strategy and other tasks that need to be completed [1.2].	6.2	\$ 625.00	\$ 3,875.00		
8/14/2013	TJM	Worked on discovery responses and analyzed issues regarding factual background [1.5].	1.5	\$ 675.00	\$ 1,012.50		
8/15/2013	EBN	Finalized plaintiff's discovery responses.	1.0	\$ 250.00	\$ 250.00		
8/15/2013	MCC	Worked on declaration template [.4]; analyzed search term issues [1.4]; drafted long email to Mr. Nunn regarding search term issues [.6]; meeting regarding declaration strategy [.2]; strategy call with co-counsel [.7]; continued working on class certification strategy plan [.5]; worked on damages calculations for discovery responses [.2].	4.0	\$ 625.00	\$ 2,500.00		
8/15/2013	TJM	Worked on discovery, class member declaration, and class certification issues [.4].	0.4	\$ 675.00	\$ 270.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/16/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
8/16/2013	EBN	Personal conference regarding class member declarations in support of class certification.	0.4	\$ 250.00	\$ 100.00		
8/16/2013	MCC	Worked on declarations [.4]; worked on discovery responses [.9].	1.3	\$ 625.00	\$ 812.50		
8/16/2013	TJM	Worked on class member declarations [.8].	0.8	\$ 675.00	\$ 540.00		
8/19/2013	EBN	Worked on declaration template; forwarded same to co-counsel [.3]; prepared discovery responses for client to review; forwarded same [.5]; memorandum regarding class member calls and declarations; meeting regarding class member calls; prepared contact spreadsheet for class member calls [2].	2.8	\$ 250.00	\$ 700.00		
8/19/2013	JEC	Meeting regarding class member calls and drafting declarations.	0.8	\$ 150.00	\$ 120.00		
8/19/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
8/20/2013	BCH	Reviewed discovery responses [.4].	0.4	\$ 450.00	\$ 180.00		
8/20/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
8/20/2013	EBN	Telephone conferences with class members regarding class certification declarations; worked on declarations.	3.0	\$ 250.00	\$ 750.00		
8/21/2013	EBN	Telephone conference with potential witness; personal conference regarding class member calls; worked on class member declarations; left message for class member regarding declaration.	1.8	\$ 250.00	\$ 450.00		
8/21/2013	JEC	Telephone conferences with and voice mails to potential declarants; meeting regarding class member calls.	2.6	\$ 150.00	\$ 390.00		
8/22/2013	EBN	Telephone conference with class member regarding declaration; worked on class member declarations.	2.3	\$ 250.00	\$ 575.00		
8/22/2013	HJB	Worked on class member declarations.	0.5	\$ 150.00	\$ 75.00		
8/22/2013	JEC	Telephone conferences with potential declarants; left messages; drafted declarations for potential declarants.	1.5	\$ 150.00	\$ 225.00		
8/23/2013	HJB	Telephone conferences with potential declarants; left messages; drafted declarations for potential declarants.	5.0	\$ 150.00	\$ 750.00		
8/23/2013	JEC	Telephone conferences with potential declarants; drafted declarations.	2.5	\$ 150.00	\$ 375.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/26/2013	EBN	Email correspondence regarding class member declarations and document production.	0.4	\$ 250.00	\$ 100.00		
8/26/2013	JEC	Finalized class member declarations.	0.4	\$ 150.00	\$ 60.00		
8/26/2013	MCC	Worked on discovery responses.	0.4	\$ 625.00	\$ 250.00		
8/26/2013	TJM	Worked on discovery and class certification issues [.3].	0.3	\$ 675.00	\$ 202.50		
8/27/2013	EBN	Correspondence regarding discovery responses and production status.	0.2	\$ 250.00	\$ 50.00		
8/27/2013	EBN	Email correspondence with co-counsel regarding document production.	0.2	\$ 250.00	\$ 50.00		
8/27/2013	JJB	Revised damages calculations and correspondence regarding same [1].	1.0	\$ 250.00	\$ 250.00		
8/27/2013	MCC	Worked on discovery responses; email correspondence regarding same.	0.4	\$ 625.00	\$ 250.00		
8/27/2013	TJM	Worked on class member declarations [.8]; telephone conference with co-counsel regarding discovery and class certification strategy issues [.3]; worked on same [.3]; worked on discovery responses [.1].	1.5	\$ 675.00	\$ 1,012.50		
8/28/2013	BCH	Worked on discovery responses [.6].	0.6	\$ 450.00	\$ 270.00		
8/28/2013	EBN	Personal conference with Mr. Marshall regarding class member declarations and calls [.3]; telephone conference with class member regarding declaration [.2].	0.5	\$ 250.00	\$ 125.00		
8/28/2013	HJB	Telephone conference with potential class member; drafted declaration.	0.7	\$ 150.00	\$ 105.00		
8/28/2013	JJB	Commenced exporting Defendant's document productions for co-counsel [.7].	0.7	\$ 250.00	\$ 175.00		
8/28/2013	MCC	Worked on declarations from class members.	0.2	\$ 625.00	\$ 125.00		
8/28/2013	TJM	Analyzed issues regarding interviews of class members [.2]; worked on class member declarations [1.0].	1.2	\$ 675.00	\$ 810.00		
8/29/2013	BCH	Worked on discovery responses [.7].	0.7	\$ 450.00	\$ 315.00		
8/29/2013	EBN	Telephone conference with class member regarding case status.	0.5	\$ 250.00	\$ 125.00		
8/29/2013	JJB	Continued exporting Defendant productions for co-counsel [.5].	0.5	\$ 250.00	\$ 125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/30/2013	BCH	Email correspondence regarding discovery responses [.2]; telephone calls to Ms. Hill regarding responses [.3].	0.5	\$ 450.00	\$ 225.00		
8/30/2013	EBN	Email correspondence regarding class member declarations.	0.5	\$ 250.00	\$ 125.00		
8/30/2013	JJB	Worked on production issues [.9].	0.9	\$ 250.00	\$ 225.00		
9/3/2013	BCH	Worked on discovery responses [.5].	0.5	\$ 450.00	\$ 225.00		
9/3/2013	EBN	Personal conference regarding class member declarations [.2]; memorandum regarding outline and questionnaire for class member calls; worked on class member call list; email regarding same [2.5].	2.7	\$ 250.00	\$ 675.00		
9/3/2013	HJB	Worked on class member declarations and related strategy conferences.	0.7	\$ 150.00	\$ 105.00		
9/3/2013	JEC	Exchanged voice mails with class member.	0.1	\$ 150.00	\$ 15.00		
9/3/2013	JJB	Worked on document review and production issues [.9].	0.9	\$ 250.00	\$ 225.00		
9/3/2013	MCC	Phone call with Mr. Haynes regarding discovery issues.	0.1	\$ 625.00	\$ 62.50		
9/3/2013	TJM	Worked on Rule 30(b)(6) deposition notice and researched and analyzed issues regarding same [1.1].	1.1	\$ 675.00	\$ 742.50		
9/4/2013	EBN	Worked on class member declarations; telephone conference with class member regarding declaration; worked on document production.	4.5	\$ 250.00	\$ 1,125.00		
9/4/2013	JJB	Worked on production and discovery issues [.8].	0.8	\$ 250.00	\$ 200.00		
9/4/2013	MCC	Email correspondence regarding class certification strategy.	0.6	\$ 625.00	\$ 375.00		
9/5/2013	BCH	Finalized discovery responses and production [1.3]; telephone conferences with Ms. Hill regarding verification [.3].	1.6	\$ 450.00	\$ 720.00		
9/5/2013	EBN	Telephone conference with class member regarding declaration; worked on class member declarations [1.2]; correspondence regarding discovery responses, production and case management issues [.3].	1.5	\$ 250.00	\$ 375.00		
9/5/2013	HJB	Worked on class member declarations.	0.2	\$ 150.00	\$ 30.00		
9/5/2013	JJB	Worked on document review [.7].	0.7	\$ 250.00	\$ 175.00		
9/5/2013	MCC	Email correspondence regarding discovery and case issues.	0.2	\$ 625.00	\$ 125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/5/2013	TJM	Worked on discovery and class certification issues [.4]; worked on class member interview outline [.2]; worked on class member declarations [.3]; worked on plaintiff's responses to defendants' discovery requests [.3]; worked on document review and factual background issues [1.0].	2.2	\$ 675.00	\$ 1,485.00		
9/6/2013	BCH	Finalized discovery and production [.6].	0.6	\$ 450.00	\$ 270.00		
9/6/2013	EBN	Forwarded discovery responses to co-counsel per request [.2]; finalized discovery requests; worked on document production; drafted privilege logs; served same [2.5]; worked on notice of deposition for Xerox [.3]; revised outline regarding class member declaration calls [.1].	3.1	\$ 250.00	\$ 775.00		
9/6/2013	HJB	Telephone conference with class member and worked on declaration.	0.7	\$ 150.00	\$ 105.00		
9/6/2013	HJB	Assisted EBN with ABC mailing regarding Plaintiffs' Responses to Def's First Set of Discovery Requests, RICOH issues included.	0.8	\$ 150.00	\$ 120.00	\$ 120.00	0.8
9/6/2013	JJB	Worked on document review [.3].	0.3	\$ 250.00	\$ 75.00		
9/6/2013	MCC	Reviewed discovery responses; email correspondence regarding same.	0.1	\$ 625.00	\$ 62.50		
9/6/2013	TJM	Worked on discovery issues [.2]; worked on finalizing responses to defendants' discovery requests [.2].	0.4	\$ 675.00	\$ 270.00		
9/8/2013	MCC	Worked on Rule 30(b)(6) notice.	0.5	\$ 625.00	\$ 312.50		
9/8/2013	TJM	Worked on issues regarding class member declarations [.1]; worked on Rule 30(b)(6) deposition notice [.1].	0.2	\$ 675.00	\$ 135.00		
9/9/2013	EBN	Finalized notice of 30(b)(6) deposition; letter to opposing counsel regarding same; served same.	0.5	\$ 250.00	\$ 125.00		
9/9/2013	JJB	Email correspondence regarding 30(b)(6) notice [.1]	0.1	\$ 250.00	\$ 25.00		
9/9/2013	TJM	Reviewed discovery correspondence and worked on outstanding discovery issues [1.0].	1.0	\$ 675.00	\$ 675.00		
9/9/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/10/2013	EBN	Email correspondence regarding class member declarations.	0.2	\$ 250.00	\$ 50.00		
9/10/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
9/10/2013	HJB	Telephone conference with class member.	0.2	\$ 150.00	\$ 30.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/10/2013	JEC	Worked on class member declarations.	3.6	\$ 150.00	\$ 540.00		
9/10/2013	MCC	Analyzed Wang v. Chinese Daily News opinion in preparation for class certification.	0.2	\$ 625.00	\$ 125.00		
9/10/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/11/2013	EBN	Personal conference with Mr. Strauss regarding class member declaration project [.7]; revised declaration template [.2]; email correspondence with Mr. Marshall regarding declarations for review [.2]; updated class member contact spreadsheet [.4]; updated declaration tracking spreadsheet; finalized declaration; letter to class member regarding declaration [.7].	2.2	\$ 250.00	\$ 550.00		
9/11/2013	MCC	Worked on declarations.	0.4	\$ 625.00	\$ 250.00		
9/11/2013	TJM	Worked on class member declarations [1.4].	1.4	\$ 675.00	\$ 945.00		
9/12/2013	EBN	Worked on class member declaration template [.5].	0.5	\$ 250.00	\$ 125.00		
9/12/2013	HJB	Meeting updating declaration template.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/13/2013	EBN	Worked on finalizing class member declarations; telephone conference with class member regarding declaration; correspondence regarding declaration status by location.	2.0	\$ 250.00	\$ 500.00		
9/13/2013	JJB	Continued work on production issues and document review [1.4].	1.4	\$ 250.00	\$ 350.00		
9/13/2013	MCC	Reviewed emails regarding depositions and declarations.	0.1	\$ 625.00	\$ 62.50		
9/13/2013	SJS	Called class members regarding declarations in support of class certification [3.8]; drafted declarations [1.2].	5.0	\$ 450.00	\$ 2,250.00		
9/13/2013	TJM	Email correspondence with opposing counsel regarding scheduling of Rule 30(b)(6) deposition [.1]; analyzed issues regarding same [.2].	0.3	\$ 675.00	\$ 202.50		
9/15/2013	MCC	Reviewed and analyzed emails regarding declarations.	0.1	\$ 625.00	\$ 62.50		
9/15/2013	SJS	Contacted class members and revised declarations [2.1].	2.1	\$ 450.00	\$ 945.00		
9/15/2013	TJM	Worked on class member declarations and analyzed issues regarding same [.3]; analyzed issues regarding timing of Xerox purchase of ACS [.1]; analyzed issues regarding expert declaration in support of class certification and worked on strategy for same [.7].	1.1	\$ 675.00	\$ 742.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/16/2013	EBN	Reviewed class member declarations; personal conference regarding revising and finalizing declarations; telephone conference with class members regarding declarations; letter to class member regarding declaration.	3.5	\$ 250.00	\$ 875.00		
9/16/2013	HJB	Worked on class member declarations.	1.4	\$ 150.00	\$ 210.00		
9/16/2013	MCC	Meetings regarding case strategy, declarations, discovery, and class certification [2]; reviewed and analyzed declarations for class certification [.8]; analyzed privilege issues for depositions [.4]; reviewed and analyzed correspondence from defense counsel regarding 30(b)(6) deposition [.7]; analyzed documents and discovery responses defendants have not yet provided [.8].	4.7	\$ 625.00	\$ 2,937.50		
9/16/2013	SJS	Contacted class members [3.2], drafted declarations [2.0].	5.2	\$ 450.00	\$ 2,340.00		
9/16/2013	TJM	Worked on class member declaration and factual background development issues [.5]; worked on class certification strategy issues [.2]; worked on outstanding discovery issues [.5]; worked on expert issues [.2].	1.4	\$ 675.00	\$ 945.00		
9/17/2013	EBN	Worked on class member declarations.	3.0	\$ 250.00	\$ 750.00		
9/17/2013	HJB	Worked on class member declarations.	1.5	\$ 150.00	\$ 225.00		
9/17/2013	JJB	Continued work on production issues and document review [1.3].	1.3	\$ 250.00	\$ 325.00		
9/17/2013	MCC	Email correspondence regarding declarations and 30(b)(6) deposition.	0.4	\$ 625.00	\$ 250.00		
9/17/2013	SJS	Contacted class members [3.1]; drafted declarations [.8].	3.9	\$ 450.00	\$ 1,755.00		
9/17/2013	TJM	Reviewed defendant's objections to Rule 30(b)(6) notice, researched and analyzed issues regarding same, and responded to same [2.0]; worked on class member declarations [2.1]; drafted email to opposing counsel regarding outstanding discovery issues and analyzed issues regarding same [.6].	4.7	\$ 675.00	\$ 3,172.50		
9/18/2013	EBN	Received call from class member regarding attorney visit to call center; email correspondence regarding same [.4]; personal conference regarding class member declarations [.2].	0.6	\$ 250.00	\$ 150.00		
9/18/2013	HJB	Worked on class member declarations.	0.5	\$ 150.00	\$ 75.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/18/2013	JJB	Continued document review [2.8].	2.8	\$ 250.00	\$ 700.00		
9/18/2013	MCC	Phone conference regarding protective order issues and class list [.4]; email correspondence regarding protective order, class list and declarations [.3].	0.7	\$ 625.00	\$ 437.50		
9/18/2013	SJS	Called class memebbers [3.5]; drafted declarations [2.0].	5.5	\$ 450.00	\$ 2,475.00		
9/18/2013	TJM	Worked on class member declaration issues [.1]; worked on class member contact issues [.2]; telephone call from co-counsel regarding same [.3].	0.6	\$ 675.00	\$ 405.00		
9/19/2013	EBN	Telephone conference with class member regarding declaration; finalized declaration [1.1]; personal conference w regarding calls to class members to finalize declarations and letters transmitting declarations to class members [.2].	1.3	\$ 250.00	\$ 325.00		
9/19/2013	HJB	Worked on class member declarations.	2.9	\$ 150.00	\$ 435.00		
9/19/2013	JJB	Continued work on production issues and document review [2.6].	2.6	\$ 250.00	\$ 650.00		
9/19/2013	MCC	Reviewed emails regarding declarations, depositions and case strategy.	0.2	\$ 625.00	\$ 125.00		
9/19/2013	SJS	Revised declarations [1.3]; called class members [3.5].	4.8	\$ 450.00	\$ 2,160.00		
9/19/2013	TJM	Worked on class member declarations [.5]; reviewed email from defense counsel regarding Rule 30(b)(6) deposition, researched and analyzed issues regarding same, and drafted response to same [.7].	1.2	\$ 675.00	\$ 810.00		
9/20/2013	EBN	Reviewed declaration for class member; forwarded same to counsel for review.	0.3	\$ 250.00	\$ 75.00		
9/20/2013	HJB	Worked on class member declarations.	1.6	\$ 150.00	\$ 240.00		
9/20/2013	JJB	Continued work on production issues and document review [2.1].	2.1	\$ 250.00	\$ 525.00		
9/20/2013	MCC	Reviewed draft declarations; email correspondence re same.	0.4	\$ 625.00	\$ 250.00		
9/20/2013	SJS	Contacted class members [4.5], drafted declarations [1.5].	6.0	\$ 450.00	\$ 2,700.00		
9/20/2013	TJM	Analyzed issues regarding disputes over Rule 30(b)(6) notice and worked on same [.5]; telephone conference with co-counsel regarding same [.5]; telephone call from opposing counsel regarding deposition issues [.4]; worked on class member declarations [.4].	1.8	\$ 675.00	\$ 1,215.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/21/2013	SJS	Conference with class member regarding work at the Lacey call center [.8], updated call notes [.3]	1.1	\$ 450.00	\$ 495.00		
9/22/2013	JJB	Continued worked on document review and deposition preparation [4.6].	4.6	\$ 250.00	\$ 1,150.00		
9/22/2013	MCC	Analyzed evidence to use for class certification.	0.1	\$ 625.00	\$ 62.50		
9/23/2013	EBN	Worked on class member declarations.	2.6	\$ 250.00	\$ 650.00		
9/23/2013	HJB	Follow up correspondence on declarations.	0.1	\$ 150.00	\$ 15.00		
9/23/2013	MCC	Email correspondence regarding 30b6 depositions [.8]; meeting regarding depositions and class certification [1]; reviewed declarations of class members [.6]; meetings regarding declarations [.6]; began preparing for 30b6 depositions [3.2].	6.2	\$ 625.00	\$ 3,875.00		
9/23/2013	SJS	Drafted declarations [2.2]; contacted class memebbers [1.8].	4.0	\$ 450.00	\$ 1,800.00		
9/23/2013	TJM	Analyzed issues regarding Rule 30(b)(6) depositions and strategy for questioning witnesses [1.1].	1.1	\$ 675.00	\$ 742.50		
9/24/2013	BKK	Prepared draft and finalized amended 30(b)(6) deposition notice; arranged court reporter; arranged service on opposing counsel.	0.5	\$ 200.00	\$ 100.00		
9/24/2013	EBN	Worked on class member declarations [2]; telephone conference with class member regarding case investigation [.2].	2.2	\$ 250.00	\$ 550.00		
9/24/2013	HJB	Class with class members.	0.2	\$ 150.00	\$ 30.00		
9/24/2013	JJB	Worked on deposition preparation and document review [1.6].	1.6	\$ 250.00	\$ 400.00		
9/24/2013	MCC	Email correspondence with opposing counsel regarding 30b6 issues [.7]; prepared for 30b6 deposition [4.6].	5.3	\$ 625.00	\$ 3,312.50		
9/24/2013	SJS	Meeting with Mr. Cote regarding policy changes at Xerox [.3]; contacted class members [5.5].	5.8	\$ 450.00	\$ 2,610.00		
9/24/2013	TJM	Analyzed issues regarding depositions and case strategy [.5].	0.5	\$ 675.00	\$ 337.50		
9/25/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
9/25/2013	JJB	Continued work on deposition preparation and document review; correspondence regarding same [1.9].	1.9	\$ 250.00	\$ 475.00		
9/25/2013	MCC	Prepared for 30b6 deposition.	6.3	\$ 625.00	\$ 3,937.50		
9/25/2013	SJS	Called class members [5]; drafted declarations [3.8].	8.8	\$ 450.00	\$ 3,960.00		
9/25/2013	TJM	Worked on class member declarations [.1].	0.1	\$ 675.00	\$ 67.50		
9/26/2013	HJB	Worked on class member declarations.	1.6	\$ 150.00	\$ 240.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/26/2013	JJB	Reviewed witness data and statements [1]; worked on document review, deposition preparation and data analysis [3.4].	4.4	\$ 250.00	\$ 1,100.00		
9/26/2013	MCC	Prepared for 30b6 deposition (3 designees) [7.7]; email correspondence regarding depositions and declarations [3]; conferences regarding 30b6 deposition [8].	8.8	\$ 625.00	\$ 5,500.00		
9/26/2013	SJS	Contacted class memebbers regarding declarations in support of class certification [3.2]; contacted class members regarding deposition of Jina Turbak [1.5]; updated class member contact spreadsheet [6].	5.3	\$ 450.00	\$ 2,385.00		
9/26/2013	TJM	Analyzed issues regarding defendants' attempt to limit communications with Washington employees regarding the Douglas litigation [7]; prepared for Rule 30(b)(6) deposition [1.4].	2.1	\$ 675.00	\$ 1,417.50		
9/26/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
9/27/2013	EBN	Personal conference regarding class member declarations and class member call.	0.2	\$ 250.00	\$ 50.00		
9/27/2013	MCC	Prepared for and traveled to deposition [1]; conducted 30b6 deposition (including lunch time preparation) [8.2]; traveled from deposition [4]; conference regarding declarations and deposition [2].	9.8	\$ 625.00	\$ 6,125.00		
9/27/2013	SJS	Contacted calls members regarding declarations in support of class certification [3]; drafted call notes and declarations [1.2].	4.2	\$ 450.00	\$ 1,890.00		
9/27/2013	TJM	Prepared for, traveled to, attended, and returned from Rule 30(b)(6) deposition [9.7].	9.7	\$ 675.00	\$ 6,547.50		
9/29/2013	MCC	Analyzed issues for class certification and began outlining class certification plan.	0.3	\$ 625.00	\$ 187.50		
9/30/2013	EBN	Researched contact information for potential witness [2]; personal conference regarding class member declarations; left message with declarant regarding declaration [2]; left message with client regarding deposition; email to client regarding same [3].	0.7	\$ 250.00	\$ 175.00		
9/30/2013	MCC	Worked on declarations [2.7]; emails regarding case strategy and declarations [5]; conferences regarding declarations [5].	3.7	\$ 625.00	\$ 2,312.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/30/2013	SJS	Revised declaration template [.4]; drafted declarations [2.5]; contacted prospective declarants [5.3].	8.2	\$ 450.00	\$ 3,690.00		
9/30/2013	TJM	Worked on factual background development and class member declaration issues [.4].	0.4	\$ 675.00	\$ 270.00		
10/1/2013	EBN	Received call from class member regarding declaration; email to Mr. Cote regarding same [.5]; worked on class member declarations [2].	2.5	\$ 250.00	\$ 625.00		
10/1/2013	JJB	Worked on production issues [.1]; worked on deposition preparation [.3].	0.4	\$ 250.00	\$ 100.00		
10/1/2013	MCC	Prepared for 30b6 deposition [3]; meeting with Mr. Strauss regarding declarations [.5]; worked on motion for class certification [1.6]; worked on declaration of Mr. MacLeod [.4]; phone call with co-counsel regarding case status and strategy [.5]; email correspondence regarding 30b6 deposition [.2].	6.2	\$ 625.00	\$ 3,875.00		
10/1/2013	SJS	Contacted class members regarding declarations in support of class certification [4.5]; revised declarations [2.1].	6.6	\$ 450.00	\$ 2,970.00		
10/1/2013	TJM	Analyzed issues regarding experts and class certification [.2]; worked on class member declarations [.1]; telephone conference with co-counsel regarding case strategy issues and division of labor [.4].	0.7	\$ 675.00	\$ 472.50		
10/2/2013	BKK	Prepared class member declaration in support of motion for class certification.	0.2	\$ 200.00	\$ 40.00		
10/2/2013	EBN	Worked on class member declarations.	4.0	\$ 250.00	\$ 1,000.00		
10/2/2013	JJB	Worked on deposition preparation [.6].	0.6	\$ 250.00	\$ 150.00		
10/2/2013	MCC	Phone call with Mr. Madden re 30b6 deposition [.8]; email correspondence re 30b6 deposition [.3]; worked on declarations and motion for class certification [7.8].	8.9	\$ 625.00	\$ 5,562.50		
10/2/2013	SJS	Contacted prospective declarants [4.5]; drafted declarations [2]; updated declaration tracking spreadsheet [.4]	6.9	\$ 450.00	\$ 3,105.00		
10/2/2013	TJM	Worked on class member declarations [.3]; analyzed issues regarding strategy for class certification [.2].	0.5	\$ 675.00	\$ 337.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/3/2013	EBN	Worked on class member declarations; worked on document production issues.	5.0	\$ 250.00	\$ 1,250.00		
10/3/2013	JJB	Worked on deposition preparation and document review [3.5].	3.5	\$ 250.00	\$ 875.00		
10/3/2013	MCC	Email correspondence with Mr. Madden regarding 30b6 deposition [.2]; prepared for 30b6 deposition [4]; worked on declarations [3]; worked on motion for class certification [.4].	7.6	\$ 625.00	\$ 4,750.00		
10/3/2013	SJS	Revised declarations and contacted class members [8].	8.0	\$ 450.00	\$ 3,600.00		
10/3/2013	TJM	Worked on case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
10/4/2013	EBN	Worked on class member declarations.	4.2	\$ 250.00	\$ 1,050.00		
10/4/2013	JJB	Continued work on deposition preparation and document review [2.8].	2.8	\$ 250.00	\$ 700.00		
10/4/2013	MCC	Worked on declarations [2.1]; worked on 30b6 deposition outlines [4]; prepared for 30b6 depositions [.5]; worked on motion for class certification [1].	7.6	\$ 625.00	\$ 4,750.00		
10/4/2013	SJS	Drafted and revised declarations [3.2]; contacted class members regarding declarations in support of class certification [4.1].	7.3	\$ 450.00	\$ 3,285.00		
10/5/2013	MCC	Prepared for 30(b)(6) deposition [.6]; worked on class certification brief [7.3].	7.9	\$ 625.00	\$ 4,937.50		
10/5/2013	SJS	Drafted declarations, contacted class members regarding declarations in support of class certification [2.2].	2.2	\$ 450.00	\$ 990.00		
10/6/2013	MCC	Worked on class certification motion [4.7]; prepared for 30b6 deposition and worked on deposition outlines [.7].	5.4	\$ 625.00	\$ 3,375.00		
10/7/2013	BKK	Reviewed and revised plaintiff's motion for class certification memorandum.	0.5	\$ 200.00	\$ 100.00		
10/7/2013	EBN	Worked on class member declarations.	4.0	\$ 250.00	\$ 1,000.00		
10/7/2013	MCC	Prepared for 30b6 deposition [.5]; conducted 30(b)(6) deposition [9.3]; traveled to and from deposition [.8].	10.6	\$ 625.00	\$ 6,625.00		
10/7/2013	SJS	Contacted class members regarding class certification [5.5]; drafted and revised declarations [3.2]	8.7	\$ 450.00	\$ 3,915.00		
10/7/2013	TJM	Traveled to, attended, and returned from Rule 30(b)(6) deposition [10.1].	10.1	\$ 675.00	\$ 6,817.50		
10/8/2013	EBN	Worked on class member declarations.	4.0	\$ 250.00	\$ 1,000.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/8/2013	HJB	Correspondence on travel itinerary.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
10/8/2013	MCC	Worked on motion for class certification and declarations.	3.9	\$ 625.00	\$ 2,437.50		
10/8/2013	SJS	Revised declarations [1.2]; reviewed declarations with class members [2.1]; drafted declarations [2.5]; contacted prospective declarants [2.9].	8.7	\$ 450.00	\$ 3,915.00		
10/8/2013	TJM	Analyzed issues regarding class certification [.2]; worked on issue regarding class member declarations [.1].	0.3	\$ 675.00	\$ 202.50		
10/9/2013	CLS	Worked on class member declarations.	1.3	\$ 200.00	\$ 260.00		
10/9/2013	EBN	Worked on class member declarations [3]; worked on plaintiff's document production index [3.6].	6.6	\$ 250.00	\$ 1,650.00		
10/9/2013	HJB	Worked on class member declarations.	1.0	\$ 150.00	\$ 150.00		
10/9/2013	JJB	Personal conferences regarding class certification and data analysis [.2].	0.2	\$ 250.00	\$ 50.00		
10/9/2013	MCC	Worked on class certification brief and declarations.	6.1	\$ 625.00	\$ 3,812.50		
10/9/2013	SJS	Contacted prospective declarants [3.5]; reviewed declarations with class members [1.5]; drafted declarations [3.].	8.0	\$ 450.00	\$ 3,600.00		
10/9/2013	TJM	Worked on motion for class certification and analyzed issues regarding same [3.6].	3.6	\$ 675.00	\$ 2,430.00		
10/10/2013	BKK	Prepared draft of and finalized motion for over-length brief; prepared draft of and finalized proposed order; arranged filing and service; arranged delivery of proposed order to chambers.	0.6	\$ 200.00	\$ 120.00		
10/10/2013	CLS	Worked on declarations for class members.	0.7	\$ 200.00	\$ 140.00		
10/10/2013	EBN	Received call from class member regarding case status [.1]; personal conference regarding class member declaration status [.2]; worked on class member declarations [3.4].	3.7	\$ 250.00	\$ 925.00		
10/10/2013	JJB	Worked on damages and class certification [.4].	0.4	\$ 250.00	\$ 100.00		
10/10/2013	MCC	Worked on class certification motion and declarations.	7.2	\$ 625.00	\$ 4,500.00		
10/10/2013	SJS	Contacted prospective declarants [4.5]; reviewed declarations with class members [2.0]; drafted and revised declarations [1.8].	8.3	\$ 450.00	\$ 3,735.00		
10/10/2013	TJM	Worked on motion for overlength brief and proposed order granting same [.1]; worked on class certification issues [.4].	0.5	\$ 675.00	\$ 337.50		
10/11/2013	CLS	Worked on declarations of class members.	1.5	\$ 200.00	\$ 300.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/11/2013	EBN	Worked on class member declarations.	2.7	\$ 250.00	\$ 675.00		
10/11/2013	HJB	Called potential class members regarding declarations.	1.3	\$ 150.00	\$ 195.00		
10/11/2013	JJB	Worked on class certification [5.1].	5.1	\$ 250.00	\$ 1,275.00		
10/11/2013	SJS	Contacted prospective declarants [3.5]; reviewed declarations with class members [2]; drafted and revised declarations [2.2].	7.7	\$ 450.00	\$ 3,465.00		
10/11/2013	TJM	Worked on class certification issues [.1].	0.1	\$ 675.00	\$ 67.50		
10/12/2013	MCC	Worked on class certification motion and declarations.	6.0	\$ 625.00	\$ 3,750.00		
10/12/2013	SJS	Contacted class members [1.5]; drafted declarations [1.2].	2.7	\$ 450.00	\$ 1,215.00		
10/12/2013	TJM	Worked on class certification strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
10/13/2013	JJB	Worked on class certification [1].	1.0	\$ 250.00	\$ 250.00		
10/13/2013	MCC	Worked on class certification motion.	3.7	\$ 625.00	\$ 2,312.50		
10/14/2013	CLS	Worked on declarations of class members.	4.5	\$ 200.00	\$ 900.00		
10/14/2013	EBN	Email correspondence regarding class member declarations; reviewed declarations; worked on class member declarations.	1.7	\$ 250.00	\$ 425.00		
10/14/2013	JJB	Worked on class certification [4].	4.0	\$ 250.00	\$ 1,000.00		
10/14/2013	MCC	Worked on class certification motion and declarations.	11.1	\$ 625.00	\$ 6,937.50		
10/14/2013	SJS	Updated class member tracking spreadsheet [.4]; called prospective declarants regarding class certification deadline [1.2]; contacted class members regarding declarations [3.1]; revised declarations [1.2]; reviewed declarations with class members over the phone [2.2].	8.1	\$ 450.00	\$ 3,645.00		
10/14/2013	TJM	Worked on class certification motion [.1].	0.1	\$ 675.00	\$ 67.50		
10/15/2013	BKK	Reviewed class member declarations; reviewed and revised motion for class certification.	2.3	\$ 200.00	\$ 460.00		
10/15/2013	CLS	Worked on declarations of class members.	0.9	\$ 200.00	\$ 180.00		
10/15/2013	EBN	Worked on class member declarations; worked on declaration tracking and issues chart; forwarded declarations to class members.	3.4	\$ 250.00	\$ 850.00		
10/15/2013	ELN	Telephone conference with Cleaver Crawford regarding factual issues and deposition preparation [1]; travelled to and from and defended depositions of Cleaver Crawford and Angela Clinton [6.6]	7.6	\$ 500.00	\$ 3,800.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/15/2013	JJB	Worked on class certification [12].	12.0	\$ 250.00	\$ 3,000.00		
10/15/2013	MCC	Worked on class certification motion and declarations.	8.8	\$ 625.00	\$ 5,500.00		
10/15/2013	SJS	Reviewed 30(b)6 deposition transcripts [1.5]; contacted class members regarding declarations [2.5]; revised and drafted new declarations [1.8]; reviewed declarations with class members over the phone [1.1]; updated class member tracking spreadsheet [.3].	7.2	\$ 450.00	\$ 3,240.00		
10/16/2013	BCH	Worked on class certification motion [.4].	0.4	\$ 450.00	\$ 180.00		
10/16/2013	BKK	Reviewed, revised and finalized motion for class certification; prepared table of contents and table of authorities; arranged filing and service.	4.5	\$ 200.00	\$ 900.00		
10/16/2013	CLS	Worked on class certification motion, declarations, and exhibits.	6.0	\$ 200.00	\$ 1,200.00		
10/16/2013	EBN	Worked on finalizing declarations; worked on brief and exhibits regarding motion for class certification [7.4]; telephone conferences with client regarding deposition; email regarding same [.5].	7.9	\$ 250.00	\$ 1,975.00		
10/16/2013	HJB	Worked on class certification motion.	0.6	\$ 150.00	\$ 90.00		
10/16/2013	JJB	Worked on class certification [12].	12.0	\$ 250.00	\$ 3,000.00		
10/16/2013	MCC	Worked on class certification motion, declarations, compendium, and exhibits.	13.3	\$ 625.00	\$ 8,312.50		
10/16/2013	SJS	Called all declarants with outstanding declarations [1.5]; revised declarations [1.5]; reviewed declarations over the phone [1.8].	4.8	\$ 450.00	\$ 2,160.00		
10/16/2013	TJM	Worked on motion for class certification and related paperwork and researched and analyzed issues regarding same [6.5]; worked on file management issues [.2].	6.7	\$ 675.00	\$ 4,522.50		
10/16/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
10/17/2013	CLS	Prepared judge's notebooks regarding class action certification.	2.0	\$ 200.00	\$ 400.00	\$ 400.00	2.0
10/17/2013	EBN	Forwarded copy of class certification motion to Ms. Hill [.2].	0.2	\$ 250.00	\$ 50.00		
10/17/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
10/17/2013	JJB	Worked on class certification; personal conferences regarding same [2].	2.0	\$ 250.00	\$ 500.00		

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
10/17/2013	MCC	Conference regarding declarations [.2]; reviewed and analyzed filing and prepared for reply arguments [.5]; email correspondence regarding deposition of Ms. Hill [.1]; conference regarding sealing issues [.2].	1.0	\$ 625.00	\$ 625.00		
10/17/2013	SJS	Telephone conference with class member regarding his experience working at Xerox [.6].	0.6	\$ 450.00	\$ 270.00		
10/18/2013	CLS	Worked on supplemental discovery.	0.3	\$ 200.00	\$ 60.00		
10/18/2013	MCC	Email correspondence regarding deposition of Tiffany Hill.	0.1	\$ 625.00	\$ 62.50		
10/18/2013	SJS	Telephone conference with class member regarding his experience working at Xerox [.6] drafted declarations [1.5].	2.1	\$ 450.00	\$ 945.00		
10/21/2013	CLS	Worked on class member declaration.	0.2	\$ 200.00	\$ 40.00		
10/21/2013	EBN	Correspondence regarding class member declarations; reviewed and finalized class member declarations [.6]; telephone conference with client regarding deposition meeting [.2].	0.8	\$ 250.00	\$ 200.00		
10/21/2013	EBN	Updated production index with discovery request information.	1.3	\$ 250.00	\$ 325.00		
10/21/2013	MCC	Prepared for deposition preparation session with client.	0.1	\$ 625.00	\$ 62.50		
10/21/2013	SJS	Conference with class member regarding working at Xerox [.6]; drafted declaration [.5]; conference with class member regarding work experience at Xerox [.6]; drafted declarations [1.1].	2.8	\$ 450.00	\$ 1,260.00		
10/21/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
10/22/2013	EBN	Received call from client regarding deposition preparation meeting; researched resource information for client; email regarding same [.7].	0.7	\$ 250.00	\$ 175.00		
10/22/2013	MCC	Conference regarding Tiffany Hill deposition prep [.1]; identified and reviewed relevant documents for meeting with Ms. Hill [.3]; meeting with Ms. Hill in preparation for deposition (including travel time) [4.6]; reviewed documents produced by defendants [.1]; email correspondence regarding sealing issue, Hill deposition, and discovery supplementation [.1].	5.2	\$ 625.00	\$ 3,250.00		
10/23/2013	EBN	Reviewed class member declaration; email correspondence regarding same.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/23/2013	SJS	Telephone conference with class member regarding his experience working at Xerox [.7].	0.7	\$ 450.00	\$ 315.00		
10/24/2013	MCC	Phone calls with client regarding deposition [.2]; conferences regarding deposition issues [.2]; researched deposition issues relating to Ms. Hill's availability [1.1].	1.5	\$ 625.00	\$ 937.50		
10/24/2013	TJM	Analyzed issues regarding deposition of Ms. Hill [.4].	0.4	\$ 675.00	\$ 270.00		
10/25/2013	EBN	Email correspondence regarding Defendants' production; updated production log.	0.2	\$ 250.00	\$ 50.00		
10/25/2013	MCC	Prepared for deposition of Ms. Hill (including phone calls with Ms. Hill).	0.9	\$ 625.00	\$ 562.50		
10/27/2013	MCC	Phone call with client regarding deposition and email correspondence with Mr. Nunn regarding exhibits marked as confidential.	0.2	\$ 625.00	\$ 125.00		
10/28/2013	EBN	Forwarded confidential exhibits to opposing counsel per request.	0.2	\$ 250.00	\$ 50.00		
10/28/2013	MCC	Drove to Federal Way to pick up client for deposition [.8]; met with client and traveled to deposition from Federal Way [1.5]; attended deposition of Ms. Hill and returned to office [3.8]; drafted summary of day 1 of deposition [.4].	6.5	\$ 625.00	\$ 4,062.50		
10/28/2013	TJM	Analyzed issues regarding deposition of client [.5].	0.5	\$ 675.00	\$ 337.50		
10/29/2013	EBN	Worked on file organization.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
10/29/2013	MCC	Worked on stipulation for extension of deadlines [.2]; phone call with Ms. Hill regarding deposition [.3]; phone call with Mr. Johnson regarding Hill deposition [.1]; began reviewing motion to seal [.2].	0.8	\$ 625.00	\$ 500.00		
10/30/2013	MCC	Conferences and email correspondence regarding motion to seal.	0.2	\$ 625.00	\$ 125.00		
10/30/2013	TJM	Analyzed issues regarding defendants' motion to seal and strategy for responding to same [.2].	0.2	\$ 675.00	\$ 135.00		
10/30/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
10/31/2013	TJM	Prepared for deposition of client [.1]; traveled to, defended, and returned from same [6.7]; meetings with client regarding same [.8].	7.6	\$ 675.00	\$ 5,130.00		
10/31/2013	WBS	Drafted opposition to Defendants' motion to file under seal .	3.4	\$ 400.00	\$ 1,360.00	\$ 1,360.00	3.4

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/1/2013	CLS	Worked on opposition to defendants' motion to seal and supporting documents.	0.3	\$ 200.00	\$ 60.00		
11/1/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
11/4/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
11/4/2013	MCC	Conference regarding Ms. Hill's deposition [.2]; began reviewing Ms. Hill's deposition transcript (day 1) [.2].	0.4	\$ 625.00	\$ 250.00		
11/4/2013	TJM	Analyzed issues regarding deposition transcript corrections [.1].	0.1	\$ 675.00	\$ 67.50		
11/4/2013	TJM	Analyzed issues regarding deposition of client [.2].	0.2	\$ 675.00	\$ 135.00		
11/4/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
11/5/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
11/5/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
11/6/2013	CLS	Worked on plaintiff's opposition to defendants' motion to seal, filed same with the court.	0.5	\$ 200.00	\$ 100.00		
11/6/2013	MCC	Worked on response to motion to seal [.9]; began reviewing Ms. Hill's deposition transcript [.3].	1.2	\$ 625.00	\$ 750.00		
11/6/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
11/8/2013	BKK	Reviewed Dan Hurley notice of appearance; amended master caption.	0.3	\$ 200.00	\$ 60.00		
11/8/2013	MCC	Reviewed reply on motion to seal.	0.3	\$ 625.00	\$ 187.50		
11/12/2013	SJS	Contacted class members regarding declarations [2.8].	2.8	\$ 450.00	\$ 1,260.00		
11/13/2013	JJB	Loaded Defendants' document production into Concordance [.8].	0.8	\$ 250.00	\$ 200.00		
11/14/2013	EBN	Worked on class member declarations.	0.5	\$ 250.00	\$ 125.00		
11/15/2013	EBN	Worked on class member declarations [.5]; forwarded deposition transcript to client for review; left voicemail regarding same [.4].	0.9	\$ 250.00	\$ 225.00		
11/19/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
11/20/2013	MCC	Began reviewing opposition to class certification.	0.3	\$ 625.00	\$ 187.50		
11/21/2013	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
11/21/2013	MCC	Conference regarding motion to seal.	0.2	\$ 625.00	\$ 125.00		
11/21/2013	TJM	Analyzed issues regarding reply in support of motion for class certification [.1].	0.1	\$ 675.00	\$ 67.50		
11/21/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
11/24/2013	MCC	Email correspondence with class member regarding case status and Xerox's class member contacts.	0.1	\$ 625.00	\$ 62.50		
11/25/2013	MCC	Phone call with class member regarding case status [.3]; reviewed Defendants' response to Plaintiff's class certification motion [1.3]; analyzed class certification arguments for reply brief [.3].	1.9	\$ 625.00	\$ 1,187.50		
11/26/2013	MCC	Conference regarding response to motion to seal [.2]; conference with co-counsel regarding case status and strategy [.4]; analyzed issues for class certification reply brief [.2].	0.8	\$ 625.00	\$ 500.00		
11/26/2013	SZ	Worked on opposition to motion to seal.	4.4	\$ 150.00	\$ 660.00		
11/26/2013	TJM	Worked on case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
11/27/2013	CLS	Transcribed voicemail message from Vicky Savage.	0.5	\$ 200.00	\$ 100.00	\$ 100.00	0.5
11/27/2013	MCC	Analyzed issues for reply brief on class certification [1.4]; email correspondence and conferences regarding Defendants' motion for partial summary judgment and briefing schedule [.5].	1.9	\$ 625.00	\$ 1,187.50		
11/27/2013	SZ	Worked on opposition to motion to seal. [3.6][1.4]	5.0	\$ 150.00	\$ 750.00		
11/27/2013	TJM	Analyzed issues regarding defendants' summary judgment motion [.4]; reviewed defendants' materials in opposition to class certification, worked on strategy for reply to same, and researched and analyzed issues regarding same [1.5].	1.9	\$ 675.00	\$ 1,282.50		
11/29/2013	MCC	Reviewed declarations submitted with Xerox's opposition to class certification and analyzed issues for reply brief on class certification motion.	2.0	\$ 625.00	\$ 1,250.00		
11/30/2013	MCC	Analyzed arguments for reply brief on class certification motion [.3]; phone call with Dan Johnson regarding class certification reply strategy and need for extension on summary judgment response [.7].	1.0	\$ 625.00	\$ 625.00		
12/1/2013	MCC	Conference regarding reply brief on class certification and briefing schedule on summary judgment motion.	0.2	\$ 625.00	\$ 125.00		
12/1/2013	MCC	Reviewed summary judgment motion [.8]; reviewed rules on seeking extension to deadline [.3]; analyzed issues for reply brief on class certification [1.2]; conference regarding summary judgment and class cert reply strategy [.5].	2.8	\$ 625.00	\$ 1,750.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/1/2013	TJM	Analyzed issues regarding work division for plaintiffs' reply in support of class certification and plan for responding to defendants' motion for summary judgment [.2]; analyzed issues regarding process for seeking extension for response to summary judgment motion [.2]; analyzed issues regarding defendants' arguments in summary judgment motion [.5]	0.9	\$ 675.00	\$ 607.50		
12/2/2013	JJB	Personal conferences regarding class certification reply; worked on facts in support of class certification reply.	1.2	\$ 250.00	\$ 300.00		
12/2/2013	MCC	Analyzed potential motion for extension on SJ response and legal rules allowing extension [.5]; long email regarding extension request [.3]; reviewed long email from Mr. Madden regarding extension request [.1]; conferences regarding need for additional time for SJ motion, analysis of rule allowing additional time, and Defendants' proposals [.6]; phone conference with opposing counsel regarding potential stipulation for briefing schedule on summary judgment motion [.6]; analyzed issues and worked on outline for reply on class certification [4.1].	6.2	\$ 625.00	\$ 3,875.00		
12/2/2013	SJS	Reviewed declarations submitted by Defendants in Opposition to Class Certification [1.8]; contacted declarants [3.5]; reviewed Berg, Sales and Wild declarations [.6].	5.9	\$ 450.00	\$ 2,655.00		
12/2/2013	SZ	Worked on opposition to motion to seal. [2.4]	2.4	\$ 150.00	\$ 360.00		
12/2/2013	TJM	Reviewed defendants' response to class certification motion and researched and analyzed issues regarding same [2.4]; analyzed issues regarding plan for obtaining extension to respond to defendants' summary judgment motion [.5]; telephone conference with opposing counsel regarding same [.5]; researched and analyzed issues regarding one-way intervention rule [.3].	3.7	\$ 675.00	\$ 2,497.50		
12/2/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
12/3/2013	CLS	Worked on proposed order denying defendants' motions to seal.	0.5	\$ 200.00	\$ 100.00		
12/3/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/3/2013	EBN	Email correspondence to client regarding deposition transcript and declaration; left voicemail regarding same.	0.3	\$ 250.00	\$ 75.00		
12/3/2013	ELN	Worked on opposition to motion to seal [.2]	0.2	\$ 500.00	\$ 100.00		
12/3/2013	JJB	Worked on facts in support of class certification reply [4.4].	4.4	\$ 250.00	\$ 1,100.00		
12/3/2013	MCC	Conference regarding class member declarations for reply on class certification [.3]; analyzed one-way intervention issue and summary judgment strategy [1.7]; worked on stipulation for summary judgment briefing deadlines [.9]; email correspondence regarding stipulation [.4]; analyzed issues for reply on class certification [1.5].	4.8	\$ 625.00	\$ 3,000.00		
12/3/2013	SJS	Contacted declarants and reviewed the pre-shift badge data presented by Xerox in the declaration of Mr. Wild [1.1]; reviewed the declaration of Maria Sales [.3]; reviewed all declarations submitted by Plaintiffs to determine the total number managers, trainers and supervisors referenced [1.6]; contacted Xerox declarants [1.1].	4.1	\$ 450.00	\$ 1,845.00		
12/3/2013	TJM	Researched and analyzed issues regarding one-way intervention rule [1.5]; analyzed issues regarding proposed stipulation to extend time for responding to defendants' summary judgment motion and worked on same [.4]; telephone conference with co-counsel regarding same [.5]; telephone call from opposing counsel regarding same [.2]; analyzed issues regarding response to defendants' motion to seal documents submitted on class certification [.3]; worked on same and researched and analyzed issues regarding same [3.0].	5.9	\$ 675.00	\$ 3,982.50		
12/3/2013	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
12/4/2013	CLS	Worked on response to motions to seal and proposed order, filed same with court.	1.0	\$ 200.00	\$ 200.00		
12/4/2013	SJS	Phone call with class member regarding his experience working at Xerox [.3]; reviewed declaration in support of class certification [.8].	1.1	\$ 450.00	\$ 495.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/4/2013	TJM	Reviewed defendants' proposed revisions to stipulation for consideration of class cert and summary judgment motions together and analyzed issues regarding same [.2]; telephone calls from opposing counsel regarding same [.3]; finalized response to motions to seal and proposed order denying same [.3].	0.8	\$ 675.00	\$ 540.00		
12/5/2013	CLS	Worked on stipulation regarding deadlines, filed same with court.	0.5	\$ 200.00	\$ 100.00		
12/5/2013	EBN	Left message with Ms. Hill regarding deposition transcript and declaration.	0.2	\$ 250.00	\$ 50.00		
12/5/2013	EBN	Telephone conference with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
12/5/2013	MCC	Worked on revisions to proposed stipulation regarding motion for partial summary judgment [.5]; conferences regarding proposed stipulation on motion for partial summary judgment [.6]; researched issues for reply brief on class certification and worked on outline of arguments [4.7]; email correspondence about reply brief on class certification and supporting declarations [.2].	6.0	\$ 625.00	\$ 3,750.00		
12/5/2013	SJS	Contacted Xerox declarants and reviewed thier declarations [2.3]; Conference with Mr. Cote regarding the Sales and Berg declarations [.3]; reviewed the declarations in support of class certification [.6]	3.2	\$ 450.00	\$ 1,440.00		
12/5/2013	TJM	Analyzed issues regarding various briefing deadlines on defendants' motions [.3]; worked on factual background and case strategy issues [.8]; worked on approach to reply brief in support of class certification [1.0].	2.1	\$ 675.00	\$ 1,417.50		
12/6/2013	EBN	Personal conference with Mr. Cote regarding analysis of Defendants' declarations and class member declaration.	0.3	\$ 250.00	\$ 75.00		
12/6/2013	MCC	Researched issues for reply brief on class certification and worked on outline for reply brief [4.3]; phone call with co-counsel regarding strategy for reply brief [.4].	4.7	\$ 625.00	\$ 2,937.50		
12/6/2013	SJS	Contacted class member regarding his work experience at Xerox [.2]; drafted declaration [.5].	0.7	\$ 450.00	\$ 315.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/6/2013	TJM	Meeting with co-counsel regarding status of case [.2]; analyzed issues regarding reply for class certification and worked on strategy for same [1.6].	1.8	\$ 675.00	\$ 1,215.00		
12/7/2013	MCC	Reviewed reply brief on motion to seal [.2]; worked on outline of reply brief on class certification [3.1].	3.3	\$ 625.00	\$ 2,062.50		
12/7/2013	TJM	Researched and analyzed issues regarding definition of "piecework" [.2].	0.2	\$ 675.00	\$ 135.00		
12/8/2013	MCC	Worked on outline of reply brief.	5.0	\$ 625.00	\$ 3,125.00		
12/8/2013	TJM	Worked on issues regarding reply in support of class certification [.2].	0.2	\$ 675.00	\$ 135.00		
12/9/2013	CLS	Worked on reply in support of motion for class certification.	0.5	\$ 200.00	\$ 100.00		
12/9/2013	EBN	Reviewed class member declaration; worked on index of defendants' agent declarations [1]; forwarded deposition transcripts to co-counsel [.2].	1.2	\$ 250.00	\$ 300.00		
12/9/2013	MCC	Conferences regarding reply brief strategy [.6]; worked on reply brief [3.3]; analyzed class member declarations [.4].	4.3	\$ 625.00	\$ 2,687.50		
12/9/2013	SJS	Contacted declarants [.5]; drafted declaration [1.2]; reviewed declarations cited in defendant's brief regarding meal and rest claims [.8].	2.5	\$ 450.00	\$ 1,125.00		
12/9/2013	TJM	Worked on issues for reply in support of class certification [.1].	0.1	\$ 675.00	\$ 67.50		
12/10/2013	CLS	Worked on and filed with court motion for overlength brief.	0.4	\$ 200.00	\$ 80.00		
12/10/2013	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
12/10/2013	EBN	Worked on defendants' declaration index; left message for class member regarding declaration; reviewed class member declaration.	1.5	\$ 250.00	\$ 375.00		
12/10/2013	JRM	Drafted section of class certification reply.	1.2	\$ 650.00	\$ 780.00		
12/10/2013	MCC	Worked on reply brief on class certification.	0.9	\$ 625.00	\$ 562.50		
12/10/2013	SJS	Contacted Xerox declarant and reviewed declaration over the phone [.5]; contacted declarant iso of Plaintiff's Class Certification Reply and reviewed declaration over the phone [.6]; contacted Xerox declarant [.5].	1.6	\$ 450.00	\$ 720.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/11/2013	EBN	Email correspondence regarding class member declaration [.2]; worked on index of Defendants' agent declarations; email correspondence regarding same [2.8].	3.0	\$ 250.00	\$ 750.00		
12/11/2013	JRM	Analyzed predominance issues.	0.5	\$ 650.00	\$ 325.00		
12/11/2013	MCC	Worked on reply brief.	6.9	\$ 625.00	\$ 4,312.50		
12/11/2013	SJS	Revised Mr. Turner's declaration [.3]; Conference with Mr. Cote regarding declarations [.2]; contacted declarant regarding her current work experience at Xerox [.8].	1.3	\$ 450.00	\$ 585.00		
12/12/2013	EBN	Reviewed deposition transcript for testimony regarding pre-shift work; worked on index of defendants' declarants; worked on class member declarations.	4.0	\$ 250.00	\$ 1,000.00		
12/12/2013	MCC	Worked on reply brief.	8.2	\$ 625.00	\$ 5,125.00		
12/12/2013	SJS	Reviewed declarations submitted in support of class certification [1.1]; reviewed draft declaration with Mr. Turner [.5]; revised Mr. Turner's declaration [.3]; reviewed declaration with Ms. Savage [.5].	2.4	\$ 450.00	\$ 1,080.00		
12/13/2013	CLS	Worked on reply in support of plaintiff's motion for class certification.	0.7	\$ 200.00	\$ 140.00		
12/13/2013	EBN	Reviewed supervisor declarations filed by Defendants; worked on class member declaration.	2.0	\$ 250.00	\$ 500.00		
12/13/2013	MCC	Worked on reply brief.	7.2	\$ 625.00	\$ 4,500.00		
12/14/2013	MCC	Worked on reply brief.	1.6	\$ 625.00	\$ 1,000.00		
12/14/2013	SJS	Call with Mr. Turner regarding his declaration and his follow-up emails [.4].	0.4	\$ 450.00	\$ 180.00		
12/14/2013	TJM	Worked on reply in support of motion for class certification [.5].	0.5	\$ 675.00	\$ 337.50		
12/15/2013	MCC	Worked on reply brief on class certification.	1.8	\$ 625.00	\$ 1,125.00		
12/15/2013	TJM	Worked on reply in support of motion for class certification [2.1].	2.1	\$ 675.00	\$ 1,417.50		
12/16/2013	BKK	Reviewed, revised and finalized reply in support of motion for class certification; prepared table of contents and table of authorities; reviewed and finalized Cote declaration; arranged filing and service; arranged delivery of courtesy copies to chambers.	1.8	\$ 200.00	\$ 360.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/16/2013	EBN	Reviewed deposition transcripts; worked on exhibits and declaration in support of reply to motion for class certification; worked on motion for class certification.	7.0	\$ 250.00	\$ 1,750.00		
12/16/2013	MCC	Worked on revisions to reply brief [4.9]; worked on declaration [.5]; email correspondence regarding reply brief [.2]; conferences regarding reply brief [.3]; reviewed and finalized reply brief and other materials for filing [.2].	6.1	\$ 625.00	\$ 3,812.50		
12/16/2013	TJM	Worked on reply in support of motion for class certification and analyzed issues regarding same and response to defendants' summary judgment motion [.9].	0.9	\$ 675.00	\$ 607.50		
12/17/2013	EBN	Finalized and forwarded correspondence to Mr. Madden [.2]; telephone conference with bankruptcy attorney regarding class member [.2].	0.4	\$ 250.00	\$ 100.00		
12/17/2013	MCC	Received, reviewed and analyzed letter from Mr. Madden regarding employee guidebook access, investigated issue, and drafted responsive letter regarding same [2.6]; email regarding sealing of Sump settlement agreement [.1].	2.7	\$ 625.00	\$ 1,687.50		
12/17/2013	TJM	Analyzed issues regarding defendants' accusation of alleged improper access to Xerox documents on internet [.3]; worked on case strategy issues [.1].	0.4	\$ 675.00	\$ 270.00		
12/18/2013	MCC	Analyzed federal requirement for declaration form [.2]; email correspondence regarding declaration [.1].	0.3	\$ 625.00	\$ 187.50		
12/19/2013	MCC	Email correspondence regarding Buchanan declaration for response to summary judgment motion [.1]; reviewed and analyzed surreply and developed strategy for potential response and additional surreply Defendants intend to file [.7]; conferences regarding case strategy in light of multiple surreplies [.3].	1.1	\$ 625.00	\$ 687.50		
12/19/2013	SJS	Meeting with Mr.Cote regarding Xerox declarants and attorney-client privilege [.3].	0.3	\$ 450.00	\$ 135.00		
12/20/2013	MCC	Conference and analysis of pre-certification privilege with class members.	0.7	\$ 625.00	\$ 437.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/20/2013	SJS	Call with class member regarding his declaration and Xerox's reply [.3]; drafted emails updating Mr. Cote on the status of the call [.1].	0.4	\$ 450.00	\$ 180.00		
12/30/2013	MCC	Reviewed Xerox's 30b6 deposition transcript corrections and analyzed propriety of substantive revisions to testimony [.4]; analyzed case law and arguments for response to summary judgment motion [.3].	0.7	\$ 625.00	\$ 437.50		
12/30/2013	TJM	Researched and analyzed issues regarding entitlement to minimum wage compensaton for non-production hours worked and drafted memorandum regarding arguments in response to defendants' summary judgment motion [1.3]; analyzed issues regarding defendants' substantive changes to Rule 30(b)(6) testimony [.1].	1.4	\$ 675.00	\$ 945.00		
12/31/2013	MCC	Phone call with court reporter's office regarding 30b6 deposition corrections [.1]; email correspondence regarding same [.1].	0.2	\$ 625.00	\$ 125.00		
1/2/2014	SZ	Documented and archived research. [.3]	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
1/3/2014	MCC	Email correspondence regarding SJ issues and analysis of SJ response [.3]; reviewed new Spokane ABC plan and phone call with class member regarding same [.2].	0.5	\$ 625.00	\$ 312.50		
1/3/2014	TJM	Worked on case strategy issues regarding defendants' motion for summary judgment [.4].	0.4	\$ 675.00	\$ 270.00		
1/7/2014	SJS	Reviewed declarations with declarants [.8]; reviewed Xerox surreply [.3]	1.1	\$ 450.00	\$ 495.00		
1/8/2014	SJS	Contacted class member [.3]; emailed declarations [.2].	0.5	\$ 450.00	\$ 225.00		
1/9/2014	MCC	Reviewed Corbis case relating to adequacy in preparation for defendant's potential arguments [.2]; analyzed legal issues for response to summary judgment and email correspondence regarding same [.5].	0.7	\$ 625.00	\$ 437.50		
1/9/2014	TJM	Analyzed issues regarding class certification motion [.1]; analyzed issues regarding response to defendants summary judgment motion [.2].	0.3	\$ 675.00	\$ 202.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/10/2014	MCC	Email correspondence regarding class member questions [.1]; analyzed defendants' motion for partial summary judgment [1]; phone call with Ms. Hill regarding case update and her current situation [.4].	1.5	\$ 625.00	\$ 937.50		
1/13/2014	MCC	Reviewed and analyzed SJ motion in preparation for response on factual issues.	0.6	\$ 625.00	\$ 375.00		
1/14/2014	EBN	Worked on declaration for Ms. Hill [.2]; contacted court reporter regarding certification pages for deposition transcripts [.3]; reviewed document production; email correspondence regarding same [1]; forwarded deposition exhibits to co-counsel [.2]; telephone conferences with potential class members regarding case status; email to same [1.2].	2.9	\$ 250.00	\$ 725.00		
1/14/2014	JJB	Correspondence regarding document production [.1].	0.1	\$ 250.00	\$ 25.00		
1/14/2014	MCC	Analyzed issues for summary judgment response.	0.4	\$ 625.00	\$ 250.00		
1/15/2014	CLS	Worked on declaration of Mr. Marshall and proposed order in support of plaintiff's response to defendants' motion for partial summary judgment.	0.4	\$ 200.00	\$ 80.00		
1/15/2014	EBN	Email correspondence to Ms. Hill regarding case update [.1]; email correspondence with co-counsel regarding deposition exhibits; searched hard files for same [.2].	0.3	\$ 250.00	\$ 75.00		
1/15/2014	JJB	Worked on data analysis for opposition to summary judgment. [2.4].	2.4	\$ 250.00	\$ 600.00		
1/15/2014	MCC	Reviewed and analyzed Defendants' motion for partial summary judgment and supporting materials [2.8]; phone calls with Ms. Hill and co-counsel regarding response to partial summary judgment motion [.3]; conferences regarding piecework arguments [.3]; worked on declaration for Ms. Hill [.3]; email correspondence regarding response to partial summary judgment motion [.3].	4.0	\$ 625.00	\$ 2,500.00		
1/15/2014	TJM	Researched and analyzed issues regarding response to defendants' motion for summary judgment and evidence being submitted in support of same [.7].	0.7	\$ 675.00	\$ 472.50		
1/16/2014	EBN	Telephone conference with Ms. Hill regarding declaration.	0.3	\$ 250.00	\$ 75.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/16/2014	JJB	Worked on data analysis for opposition to summary judgment motion.	0.3	\$ 250.00	\$ 75.00		
1/16/2014	MCC	Worked on response to motion for partial summary judgment.	10.7	\$ 625.00	\$ 6,687.50		
1/16/2014	TJM	Worked on response to reply brief [4.3]; telephone conference with co-counsel regarding same [.4]; researched and analyzed issues regarding same [1.1].	5.8	\$ 675.00	\$ 3,915.00		
1/17/2014	CLS	Worked on plaintiff's response to defendants' motion for partial summary judgment.	4.0	\$ 200.00	\$ 800.00		
1/17/2014	EBN	Worked on response to motion for summary judgment; filed and served same.	7.0	\$ 250.00	\$ 1,750.00		
1/17/2014	JJB	Worked on data analysis for summary judgement opposition.	0.2	\$ 250.00	\$ 50.00		
1/17/2014	MCC	Worked on response to motion for partial summary judgment and declaration of Toby Marshall.	8.9	\$ 625.00	\$ 5,562.50		
1/17/2014	TJM	Worked on response to defendants' motion for summary judgment and researched and analyzed issues regarding same [4.9]; worked on declaration in support of response brief [.3].	5.2	\$ 675.00	\$ 3,510.00		
1/20/2014	MCC	Reviewed motion to file surreply, declarations and surreply [1]; email correspondence regarding surreply response [.1].	1.1	\$ 625.00	\$ 687.50		
1/20/2014	SJS	Reviewed declarations of Xerox attorneys and declaration of Mr. Turner [1]; meeting with Mr. Cote to discuss Mr. Turner declaration [.3]; call with Mr. Turner [.3].	1.6	\$ 450.00	\$ 720.00		
1/20/2014	TJM	Analyzed issues regarding defendants' reply in support of motion for surreply [.2].	0.2	\$ 675.00	\$ 135.00		
1/21/2014	CLS	Worked on judge's working copies and plaintiff's response to defendants' request for surreply regarding plaintiff's class action certification briefing.	1.2	\$ 200.00	\$ 240.00	\$ 240.00	1.2
1/21/2014	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
1/21/2014	JJB	Worked on data analysis and personal conference regarding same [.2].	0.2	\$ 250.00	\$ 50.00		
1/21/2014	MCC	Conference regarding evidence and potential declaration for response to surreply motion [.4]; worked on response to surreply motion [2].	2.4	\$ 625.00	\$ 1,500.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/21/2014	SJS	Reviewed letter from Mr. Turner [.4]; telephone call with Mr. Turner [.3].	0.7	\$ 450.00	\$ 315.00		
1/21/2014	TJM	Analyzed issues regarding employee complaint and sur-reply briefing [.2].	0.2	\$ 675.00	\$ 135.00		
1/21/2014	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
1/22/2014	JJB	Worked on data analysis [1.2].	1.2	\$ 250.00	\$ 300.00		
1/22/2014	MCC	Worked on response to motion to file surreply.	6.6	\$ 625.00	\$ 4,125.00		
1/22/2014	SJS	Meeting with Mr. Cote regarding class member declarations [.4].	0.4	\$ 450.00	\$ 180.00		
1/23/2014	CLS	Worked on proposed order regarding defendants' motion for surreply.	0.3	\$ 200.00	\$ 60.00		
1/23/2014	MCC	Worked on response to surreply motion.	3.0	\$ 625.00	\$ 1,875.00		
1/23/2014	SJS	Reviewed badge data [.8].	0.8	\$ 450.00	\$ 360.00		
1/25/2014	TJM	Worked on response to defendants' motion for leave to file surreply [.3].	0.3	\$ 675.00	\$ 202.50		
1/27/2014	BKK	Reviewed, revised and finalized plaintiff's response to defendants' motion to file sur-reply; prepared table of contents and table of authorities; arranged filing and service;	1.8	\$ 200.00	\$ 360.00		
1/27/2014	MCC	Worked on response to surreply motion [1.9]; began reviewing Defendants' proposed stipulation on motion to seal [.1].	2.0	\$ 625.00	\$ 1,250.00		
1/27/2014	SJS	Emailed declarants [.2]; conferece with Mr. Cote regarding additonal declarations [.2].	0.4	\$ 450.00	\$ 180.00		
1/27/2014	TJM	Worked on response to motion for surreply [.1].	0.1	\$ 675.00	\$ 67.50		
1/28/2014	MCC	Worked on revisions of stipulation to seal Sump documents.	0.8	\$ 625.00	\$ 500.00		
1/29/2014	MCC	Worked on stipulation to seal Sump settlement materials.	0.4	\$ 625.00	\$ 250.00		
1/29/2014	TJM	Analyzed issues regarding sealing of documents [.1].	0.1	\$ 675.00	\$ 67.50		
1/30/2014	MCC	Received phone call from Lynne Buchanan regarding declaration [.2]; analyzed declaration filed by Defendants [.7]; received second phone call from Ms. Buchanan regarding declaration [.3]; conference regarding potential supplemental declaration from Ms. Buchanan [.5].	1.7	\$ 625.00	\$ 1,062.50		
1/30/2014	TJM	Analyzed issues regarding declarations from Ms. Buchanan [.5].	0.5	\$ 675.00	\$ 337.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/31/2014	MCC	Worked on supplemental declaration of Lynne Buchanan [1]; analyzed potential response to Defendants' deceptive declaration [.3]; email correspondence regarding declaration [.1]; phone call with Ms. Goss regarding declaration from Ms. Buchanan [.3]; reviewed and analyzed Defendants' surreply [.5]; received phone call from client regarding case update [.2].	2.4	\$ 625.00	\$ 1,500.00		
1/31/2014	TJM	Analyzed issues regarding supplemental declaration of Ms. Buchanan [.2]; worked on same [.2].	0.4	\$ 675.00	\$ 270.00		
2/3/2014	MCC	Conference regarding supplemental declaration of Ms. Buchanan [.1]; phone call with co-counsel regarding supplemental declaration of co-counsel [.2]; analyzed draft declaration [.1]; analyzed law on deadline to submit affidavits or declarations in opposition to summary judgment [.6].	1.0	\$ 625.00	\$ 625.00		
2/3/2014	TJM	Analyzed issues regarding declarations from Ms. Buchanan [.2].	0.2	\$ 675.00	\$ 135.00		
2/4/2014	MCC	Email regarding stipulation to seal Sump settlement agreement.	0.1	\$ 625.00	\$ 62.50		
2/5/2014	EBN	Telephone conference with class member; letter to class member regarding returning original documents.	0.4	\$ 250.00	\$ 100.00		
2/5/2014	MCC	Worked on stipulation to seal Sump settlement documents and email correspondence regarding same [.4]; email correspondence regarding Spokane manager's discipline of employees [.2].	0.6	\$ 625.00	\$ 375.00		
2/6/2014	EBN	Telephone conferences with class members regarding case status; left messages with class members regarding same.	1.0	\$ 250.00	\$ 250.00		
2/6/2014	MCC	Email correspondence with class member regarding Spokane call center [.2]; reviewed motion to seal filed by Defendants [.2].	0.4	\$ 625.00	\$ 250.00		
2/7/2014	MCC	Reviewed declarations filed with motion to seal.	0.1	\$ 625.00	\$ 62.50		
2/9/2014	MCC	Reviewed reply brief on summary judgment filed by Defendants.	0.4	\$ 625.00	\$ 250.00		
2/10/2014	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
2/10/2014	EBN	Received call from potential class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
2/10/2014	EBN	Reviewed and compared exhibits filed by Defendants with motion to seal to exhibits submitted in camera in support of response to motion for summary judgment.	1.0	\$ 250.00	\$ 250.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/10/2014	MCC	Reviewed materials on motion to seal and analyzed proper response [.9]; worked on Buchanan supplemental declaration and email to Ms. Buchanan [1]; reviewed Todd Nunn's reply declaration and exhibits and analyzed reply brief [.9].	2.8	\$ 625.00	\$ 1,750.00		
2/10/2014	TJM	Reviewed defendants' reply in support of summary judgment and analyzed issues regarding same [.7]; worked on supplemental declaration of Ms. Buchanan and analyzed issues regarding same [.2].	0.9	\$ 675.00	\$ 607.50		
2/10/2014	TLM	Worked on docketing	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
2/11/2014	BKK	Prepared draft of response to motion to seal; prepared draft of proposed order.	0.5	\$ 200.00	\$ 100.00		
2/11/2014	MCC	Email correspondence regarding Lynne Buchanan declaration.	0.1	\$ 625.00	\$ 62.50		
2/12/2014	MCC	Worked on response to motion to seal [1.2]; phone call with Mr. Cogan (mediator) regarding case status [.2].	1.4	\$ 625.00	\$ 875.00		
2/12/2014	TJM	Worked on response to motion to seal [.1].	0.1	\$ 675.00	\$ 67.50		
2/13/2014	EBN	Worked on file organization.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
2/13/2014	MCC	Analyzed administrative policies, case law, and declarations in preparation for call with Ms. Buchanan [1.3]; phone call with Ms. Buchanan, Mr. Johnson, and Ms. Cartwright regarding declarations and L&I admin policies and follow up discussion with Mr. Marshall [.7]; phone call with class member regarding per-hour approach to minimum wage and L&I positions [.7].	2.7	\$ 625.00	\$ 1,687.50		
2/13/2014	TJM	Telephone conference with Ms. Buchanan and others from DLI [.5]; analyzed issues regarding same [.2].	0.7	\$ 675.00	\$ 472.50		
2/14/2014	EBN	Telephone conference with class member regarding case update.	0.2	\$ 250.00	\$ 50.00		
3/5/2014	SJS	Call with class member [.4].	0.4	\$ 450.00	\$ 180.00		
3/7/2014	MCC	Reviewed documents produced in case.	0.2	\$ 625.00	\$ 125.00		
3/11/2014	MCC	Email correspondence regarding class member.	0.1	\$ 625.00	\$ 62.50		
3/13/2014	EBN	Received call from potential class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
3/14/2014	SJS	Call with class member [.4].	0.4	\$ 450.00	\$ 180.00		
3/21/2014	EBN	Telephone conference with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
3/28/2014	MCC	Reviewed and analyzed court's ruling on motion to seal.	0.2	\$ 625.00	\$ 125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
4/2/2014	EBN	Received call from class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
4/7/2014	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
4/7/2014	MCC	Reviewed and analyzed order from court on sealing issues.	0.4	\$ 625.00	\$ 250.00		
4/8/2014	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
4/9/2014	EBN	Worked on docketing.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
4/11/2014	MCC	Reviewed and analyzed orders on sealing [.1]; email correspondence regarding whether additional briefing is necessary for Ms. Hill's pay records [.1]; phone call with Ms. Hill regarding pay record issue and case status [.2].	0.4	\$ 625.00	\$ 250.00		
4/16/2014	EBN	Telephone conference with potential class member regarding case status; email to same.	0.2	\$ 250.00	\$ 50.00		
4/24/2014	MCC	Email correspondence with class member regarding case update.	0.1	\$ 625.00	\$ 62.50		
6/8/2014	MCC	Email correspondence with class member and with co-counsel regarding closure of Spokane business unit.	0.2	\$ 625.00	\$ 125.00		
6/9/2014	MCC	Conference regarding closure of Spokane call center.	0.1	\$ 625.00	\$ 62.50		
6/9/2014	TJM	Analyzed issues regarding announcement of closure of Spokane operations [.1].	0.1	\$ 675.00	\$ 67.50		
6/10/2014	EBN	Telephone conference with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
7/10/2014	MCC	Reviewed and analyzed order on class certification and summary judgment.	1.0	\$ 625.00	\$ 625.00		
7/10/2014	TJM	Reviewed Court's order on certification and analyzed issues regarding same and case strategy [.7].	0.7	\$ 675.00	\$ 472.50		
7/11/2014	EBN	Email correspondence to client regarding class certification order.	0.2	\$ 250.00	\$ 50.00		
7/11/2014	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
7/11/2014	HKO	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
7/11/2014	MCC	Continued analyzing orders from judge and email correspondence regarding same [.9]; analyzed potential Rule 23(f) appeal of decision not to certify off-the-clock claims [1.5]; email correspondence with opposing counsel regarding judge's orders and next steps [.1]; phone conference with co-counsel regarding case strategy in light of court's orders on class certification and summary judgment [.8].	3.3	\$ 625.00	\$ 2,062.50		

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
7/11/2014	TJM	Analyzed issues regarding case strategy in light of certification order [.4]; telephone conference with co-counsel regarding same [.3]; analyzed issues regarding class notice [.1].	0.8	\$ 675.00	\$ 540.00		
7/11/2014	TLM	Worked on docketing.	0.1	\$ 125.00	\$ 12.50	\$ 12.50	0.1
7/14/2014	EBN	Email correspondence regarding telephone conference with client.	0.2	\$ 250.00	\$ 50.00		
7/14/2014	MCC	Conference regarding order on class certification [.1]; continued analyzing strategy for case resolution [.1].	0.2	\$ 625.00	\$ 125.00		
7/14/2014	SJS	Reviewed Class Certification Order [.3].	0.3	\$ 450.00	\$ 135.00		
7/15/2014	EBN	Email correspondence to client regarding class certification order and telephone conference.	0.2	\$ 250.00	\$ 50.00		
7/15/2014	MCC	Analyzed issues for 23(f) appeal [1]; phone call with Mr. Madden and Mr. Nunn regarding requirements of order on class certification and potential settlement discussions [.3]; conferences with Mr. Marshall and Mr. Johnson regarding case strategy [.8]; analyzed strategy for case resolution [.3].	2.4	\$ 625.00	\$ 1,500.00		
7/15/2014	TJM	Analyzed issues regarding court's certification order and chances for successfully filing Rule 23(f) petition [1.7]; telephone conference with co-counsel regarding same [.2].	1.9	\$ 675.00	\$ 1,282.50		
7/17/2014	JRM	Worked on petition for review.	0.5	\$ 650.00	\$ 325.00		
7/21/2014	CLS	Worked on petition for review.	0.2	\$ 200.00	\$ 40.00		
7/21/2014	JRM	Worked on petition for review of off-the-clock decision.	8.2	\$ 650.00	\$ 5,330.00		
7/21/2014	MCC	Worked on Rule 23(f) petition and conferences regarding strategy for 23(f) petition.	3.6	\$ 625.00	\$ 2,250.00		
7/21/2014	SJS	Class with class member [.4].	0.4	\$ 450.00	\$ 180.00		
7/22/2014	JRM	Worked on petition for review.	1.5	\$ 650.00	\$ 975.00		
7/22/2014	MCC	Analyzed propriety of Rule 23(f) appeal [.6]; conferences regarding whether to file Rule 23(f) appeal and case strategy for resolution [.6].	1.2	\$ 625.00	\$ 750.00		
7/22/2014	TJM	Analyzed issues regarding decision on Rule 23(f) appeal [.4].	0.4	\$ 675.00	\$ 270.00		
7/24/2014	EBN	Email correspondence to client regarding updated contact information and class certification order.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/24/2014	MCC	Conference regarding Defendants' motion for reconsideration.	0.1	\$ 625.00	\$ 62.50		
7/24/2014	MCC	Reviewed and analyzed motion for reconsideration filed by Defendants.	0.4	\$ 625.00	\$ 250.00		
7/25/2014	MCC	Researched appeal timelines in light of Defendants' motion filing [.1]; email correspondence with class member regarding case status [.2].	0.3	\$ 625.00	\$ 187.50		
7/28/2014	MCC	Email correspondence regarding notice issues and class list [.4]; analyzed case strategy [.1].	0.5	\$ 625.00	\$ 312.50		
7/28/2014	TJM	Analyzed issues regarding strategy for filing summary judgment motion [.1].	0.1	\$ 675.00	\$ 67.50		
7/29/2014	HKO	Updated class member contact information.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
7/29/2014	MCC	Email correspondence regarding notice website.	0.1	\$ 625.00	\$ 62.50		
7/30/2014	EBN	Email correspondence regarding client.	0.2	\$ 250.00	\$ 50.00		
7/30/2014	MCC	Email correspondence regarding contact with Ms. Hill.	0.1	\$ 625.00	\$ 62.50		
7/31/2014	MCC	Email correspondence regarding sealing issues for Sump settlement agreement briefing.	0.1	\$ 625.00	\$ 62.50		
8/1/2014	MCC	Worked on revisions to brief regarding Sump [.7]; email correspondence regarding Sump brief [.2]; phone conference with Mr. Nunn regarding sealing issues [.2]; email correspondence regarding sealing issues [.1].	1.2	\$ 625.00	\$ 750.00		
8/1/2014	TJM	Analyzed issues regarding case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
8/4/2014	MCC	Review briefs filed relating to Sump settlement.	0.3	\$ 625.00	\$ 187.50		
8/5/2014	EBN	Email correspondence regarding document production; updated production log.	0.3	\$ 250.00	\$ 75.00		
8/15/2014	MCC	Phone call with class member regarding case status and next steps [.5]; phone call with Ms. Hill regarding case status and next steps [.3].	0.8	\$ 625.00	\$ 500.00		
8/18/2014	MCC	Reviewed Defendants' production of documents.	1.0	\$ 625.00	\$ 625.00		
8/18/2014	TJM	Analyzed issues regarding DLI's handling of claims by Xerox employees [.2].	0.2	\$ 675.00	\$ 135.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/20/2014	EBN	Telephone conference with class member regarding case status; email correspondence to Mr. Cote regarding same; updated class member spreadsheet.	0.3	\$ 250.00	\$ 75.00		
8/25/2014	MCC	Analyzed strategy for case resolution.	0.3	\$ 625.00	\$ 187.50		
8/26/2014	MCC	Analyzed damages for potential settlement offer.	0.2	\$ 625.00	\$ 125.00		
9/3/2014	MCC	Analyzed off-the-clock claims in light of new ninth circuit opinion.	0.2	\$ 625.00	\$ 125.00		
9/18/2014	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/18/2014	MCC	Reviewed and analyzed order from Judge Coughenour [.3]; conference regarding case strategy [.1]; analyzed rules for appeal to ninth circuit and potential motion to certify legal question to Washington Supreme Court [.3].	0.7	\$ 625.00	\$ 437.50		
9/18/2014	TJM	Reviewed court's order on motion for reconsideration [.2]; accounting issues regarding possibility of Ninth Circuit certify issues to Washington State Supreme Court [.1].	0.3	\$ 675.00	\$ 202.50		
9/22/2014	MCC	Analyzed defendants' proposal to stay proceedings pending appeal; email correspondence regarding same.	0.5	\$ 625.00	\$ 312.50		
9/23/2014	MCC	Email correspondence regarding interlocutory appeal issues [.2]; phone call with Mr. Johnson regarding stay proposal [.2]; analyzed potential stay [.1].	0.5	\$ 625.00	\$ 312.50		
9/24/2014	TJM	Analyzed issues regarding defendants' request to stay proceedings and email correspondence with co-counsel regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
9/29/2014	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/29/2014	MCC	Reviewed Xerox's petition for permission to appeal and analyzed deadline for response and best arguments for response [.9]; email correspondence regarding Xerox's petition [.1].	1.0	\$ 625.00	\$ 625.00		
9/29/2014	TJM	Email correspondence with class member regarding experiences as employee at one of Defendants' call centers in Washington [.1].	0.1	\$ 675.00	\$ 67.50		
9/30/2014	CLS	Worked on caption, answer to petition for appeal.	0.5	\$ 200.00	\$ 100.00	\$ 100.00	0.5

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/30/2014	MCC	Conferences regarding strategy for answer to petition for permission to appeal [.8]; researched legal standards for 1292(b) interlocutory review [3]; analyzed and outlined Defendants' arguments and proposed response [2.5].	6.3	\$ 625.00	\$ 3,937.50		
9/30/2014	TJM	Reviewed defendants' petition for interlocutory review and analyzed issues regarding strategy for responding to same [1.0].	1.0	\$ 675.00	\$ 675.00		
10/1/2014	HKO	Worked on docketing.	0.5	\$ 150.00	\$ 75.00	\$ 75.00	0.5
10/1/2014	MCC	Worked on answer to petition for permission to appeal.	7.8	\$ 625.00	\$ 4,875.00		
10/1/2014	TJM	Reviewed defendants' motion to stay and analyzed issues regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
10/2/2014	MCC	Worked on answer to petition for permission to appeal.	7.0	\$ 625.00	\$ 4,375.00		
10/3/2014	BKK	Reviewed and revised response to permission to appeal.	1.1	\$ 200.00	\$ 220.00		
10/3/2014	MCC	Worked on answer to petition for permission to appeal.	1.5	\$ 625.00	\$ 937.50		
10/4/2014	MCC	Worked on answer to petition for permission to appeal.	1.2	\$ 625.00	\$ 750.00		
10/6/2014	MCC	Worked on answer to petition for permission to appeal.	1.6	\$ 625.00	\$ 1,000.00		
10/8/2014	BKK	Reviewed local rules and practice procedures; prepared draft and finalized of necessity to file sealed documents; assembled sealed documents.	1.8	\$ 200.00	\$ 360.00		
10/8/2014	HKO	Created cover page for filing.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
10/8/2014	MCC	Worked on answer to petition for permission to appeal and notification of submission of sealed exhibits.	3.9	\$ 625.00	\$ 2,437.50		
10/8/2014	TJM	Worked on response to motion for interlocutory review [.2].	0.2	\$ 675.00	\$ 135.00		
10/9/2014	BKK	Reviewed, revised and finalized answer to petition for permission to appeal; prepared table of contents and table of authorities; arranged filing and service.	3.9	\$ 200.00	\$ 780.00		
10/9/2014	MCC	Worked on answer to petitioner's petition for permission to appeal.	1.7	\$ 625.00	\$ 1,062.50		
10/10/2014	MCC	Reviewed rules for filing when deadline is on holiday to ensure response to motion to stay is timely filed.	0.2	\$ 625.00	\$ 125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/14/2014	MCC	Reviewed Xerox's motion to stay and relevant case in law in preparation for response to motion to stay [.3]; reviewed and revised draft response to motion to stay [1.5]; phone call with co-counsel regarding response brief [.1]; analyzed final response and strategy for next steps [.2].	2.1	\$ 625.00	\$ 1,312.50		
10/16/2014	MCC	Reviewed and analyzed Xerox's motion for leave to file reply and proposed reply brief.	0.8	\$ 625.00	\$ 500.00		
10/17/2014	EBN	Worked on docketing.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
10/17/2014	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
10/20/2014	MCC	Reviewed Xerox's reply brief for motion for stay [.1]; email correspondence regarding response to motion for leave to file reply brief in appeal [.1].	0.2	\$ 625.00	\$ 125.00		
10/27/2014	MCC	Reviewed brief filed with 9th circuit.	0.1	\$ 625.00	\$ 62.50		
11/17/2014	MCC	Reviewed order on motion to stay; email correspondence with co-counsel regarding same.	0.2	\$ 625.00	\$ 125.00		
11/26/2014	MCC	Phone call with Ms. Hill regarding case status.	0.1	\$ 625.00	\$ 62.50		
12/3/2014	HKO	Worked on docketing.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
12/3/2014	MCC	Reviewed and analyzed order and related documents from 9th Circuit [.6]; began analyzing motion to certify question to Washington Supreme Court, including emails about same [.7].	1.3	\$ 625.00	\$ 812.50		
12/4/2014	HMR	Drafted motion to certify questions to Supreme Court.	1.5	\$ 200.00	\$ 300.00		
12/4/2014	MCC	Began analyzing issues for motion to certify questions to Washington Supreme Court.	0.6	\$ 625.00	\$ 375.00		
12/5/2014	MCC	Began analyzing and outlining issues for certified question brief.	1.7	\$ 625.00	\$ 1,062.50		
12/8/2014	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
12/8/2014	MCC	Analyzed case law and arguments for motion to certify legal question to WA SC and outlined arguments.	1.8	\$ 625.00	\$ 1,125.00		
12/9/2014	MCC	Worked on motion to certify legal question to Washington Supreme Court [4.2]; reviewed and analyzed Xerox's filings in 9th Circuit [.4].	4.6	\$ 625.00	\$ 2,875.00		
12/9/2014	TJM	Analyzed issues regarding certification of questions to state supreme court [.2].	0.2	\$ 675.00	\$ 135.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/10/2014	HMR	Formatted Caption	0.5	\$ 200.00	\$ 100.00	\$ 100.00	0.5
12/10/2014	MCC	Reviewed Xerox filings in 9th circuit [.2]; worked on motion to certify legal question [2.8]; conference regarding strategy for framing of proposed certified question [.4].	3.4	\$ 625.00	\$ 2,125.00		
12/10/2014	TJM	Analyzed issues regarding motion for certification to Washington State Supreme Court [1.1].	1.1	\$ 675.00	\$ 742.50		
12/11/2014	MCC	Worked on motion to certify legal question to Washington Supreme Court [2]; reviewed and analyzed order setting mediation assessment conference [.2].	2.2	\$ 625.00	\$ 1,375.00		
12/12/2014	HKO	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
12/15/2014	MCC	Worked on motion to certify legal question to Washington Supreme Court, including conferences regarding brief with Mr. Marshall.	2.8	\$ 625.00	\$ 1,750.00		
12/15/2014	TJM	Worked on motion to certify question to state supreme court and researched and analyzed issues regarding same [2.9].	2.9	\$ 675.00	\$ 1,957.50		
12/17/2014	MCC	Worked on motion to certify legal claims.	0.2	\$ 625.00	\$ 125.00		
12/18/2014	MCC	Worked on motion to certify legal questions to Washington Supreme Court.	1.3	\$ 625.00	\$ 812.50		
12/26/2014	TJM	Worked on motion to certify questions to state supreme court [.6].	0.6	\$ 675.00	\$ 405.00		
12/29/2014	MCC	Worked on motion to certify legal questions to Washington Supreme Court.	0.5	\$ 625.00	\$ 312.50		
1/6/2015	MCC	Email correspondence regarding motion to certify question to Washington Supreme Court and reviewed proposed revisions to motion.	0.2	\$ 625.00	\$ 125.00		
1/7/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
1/7/2015	MCC	Worked on certified question brief, call with Mr. Johnson regarding certified question brief.	2.4	\$ 625.00	\$ 1,500.00		
1/7/2015	TJM	Analyzed issues regarding motion to certify issues to state supreme court [.2].	0.2	\$ 675.00	\$ 135.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/15/2015	MCC	Email correspondence regarding mediation assessment conference [.2]; reviewed mediation assessment conference order and details at 9th circuit website [.2].	0.4	\$ 625.00	\$ 250.00		
1/15/2015	TJM	Analyzed issues regarding call with Mr. Goelz, Ninth Circuit mediator [.1].	0.1	\$ 675.00	\$ 67.50		
1/19/2015	MCC	Worked on certified question brief [1]; conference with Mr. Marshall regarding certified question brief [.2]; email correspondence to opposing counsel regarding brief [.1].	1.3	\$ 625.00	\$ 812.50		
1/19/2015	TJM	Worked on motion to certify question to State Supreme Court [.2].	0.2	\$ 675.00	\$ 135.00		
1/20/2015	HMR	Finalized motion to certify.	1.5	\$ 200.00	\$ 300.00		
1/20/2015	MCC	Worked on certified question brief [1.8]; prepared for mediation assessment conference [.7].	2.5	\$ 625.00	\$ 1,562.50		
1/20/2015	TJM	Analyzed issues regarding call with Ninth Circuit mediator [.2].	0.2	\$ 675.00	\$ 135.00		
1/21/2015	HKO	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
1/21/2015	MCC	Email correspondence regarding mediation conference.	0.1	\$ 625.00	\$ 62.50		
1/21/2015	TJM	Analyzed issues regarding defendants' refusal to move mediation conference call to accommodate Mr. Cote's illness [.1].	0.1	\$ 675.00	\$ 67.50		
1/28/2015	MCC	Analyzed briefing deadlines for certification issue and strategy for reply.	0.2	\$ 625.00	\$ 125.00		
1/30/2015	MCC	Email correspondence with co-counsel regarding mediation conference and certified question reply brief.	0.2	\$ 625.00	\$ 125.00		
2/2/2015	MCC	Analyzed certification issues and emailed regarding same [.4]; began reviewing Defendants' response to motion to certify legal questions [.8].	1.2	\$ 625.00	\$ 750.00		
2/3/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
2/3/2015	MCC	Reviewed Xerox's response to motion to certify and reviewed and analyzed case law cited therein [1.5]; worked on outline of case law summaries from Xerox's brief in preparation for reply brief and sent outline to co-counsel [1.4]; conferences with Mr, Marshall and with co-counsel regarding strategy for reply brief [.5].	3.4	\$ 625.00	\$ 2,125.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/3/2015	TJM	Reviewed defendants' opposition to motion to certify questions to state supreme court and analyzed issues regarding same [.8]; telephone conference with co-counsel regarding same [.4].	1.2	\$ 675.00	\$ 810.00		
2/4/2015	MCC	Analyzed strategy for mediation assessment conference [.1]; prepared for mediation call and participated in mediation call, follow up calls with Mr. Goelz, and follow up calls with Mr. Johnson [1.4]; worked on damages calculations and data analysis for settlement offer [3.5]; conferences regarding strategy for settlement offer and damages issues [.4].	5.4	\$ 625.00	\$ 3,375.00		
2/4/2015	TJM	Analyzed issues regarding discussions with Mr. Goelz about mediation [.1]; worked on damages analyses and strategy for settlement negotiations [.6].	0.7	\$ 675.00	\$ 472.50		
2/5/2015	MCC	Worked on damages calculations for settlement demand [2.1]; worked on reply brief on certified question [.7].	2.8	\$ 625.00	\$ 1,750.00		
2/5/2015	TJM	Worked on reply in support of motion to certify questions to state supreme court [.2]; analyzed issues regarding damages calculations and settlement proposal [.2].	0.4	\$ 675.00	\$ 270.00		
2/6/2015	BHC	Personal conference with Mr. Cote regarding Ninth Circuit procedures [.3].	0.3	\$ 575.00	\$ 172.50	\$ 172.50	0.3
2/6/2015	MCC	Worked on reply brief [3.8]; worked on damages calculations and settlement demand proposal [.6].	4.4	\$ 625.00	\$ 2,750.00		
2/6/2015	TJM	Worked on strategy issues for settlement negotiations [.1].	0.1	\$ 675.00	\$ 67.50		
2/8/2015	TJM	Worked on reply in support of motion to certify question to state supreme court [1.0]; worked on settlement issues [.1].	1.1	\$ 675.00	\$ 742.50		
2/9/2015	MCC	Worked on reply brief on proposed certified question [.7]; email correspondence regarding reply brief and sealed documents [.2]; phone call with Mr. Goelz regarding potential mediation [.1]; analyzed settlement issues [.3].	1.3	\$ 625.00	\$ 812.50		
2/9/2015	TJM	Worked on reply in support of motion to certify question to state supreme court [.1].	0.1	\$ 675.00	\$ 67.50		
2/10/2015	EBN	Telephone conference with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/10/2015	MCC	Phone call with co-counsel regarding settlement strategy (portion of total call) [.5]; analyzed settlement issues [.5]; phone call with Ms. Hill regarding settlement offer [.2]; worked on settlement offer message to mediator [.4].	1.6	\$ 625.00	\$ 1,000.00		
2/10/2015	TJM	Analyzed issues regarding settlement strategy [.2]; telephone conference with co-counsel regarding same [.5].	0.7	\$ 675.00	\$ 472.50		
2/11/2015	EBN	Email correspondence to class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
2/11/2015	MCC	Email correspondence regarding settlement proposal.	0.1	\$ 625.00	\$ 62.50		
2/11/2015	TJM	Worked on settlement proposal [.1]; analyzed issues regarding same [.1].	0.2	\$ 675.00	\$ 135.00		
2/12/2015	MCC	Analyzed settlement issues.	0.1	\$ 625.00	\$ 62.50		
2/17/2015	BHC	Personal conference with Mr. Cote regarding appeal strategy [.2].	0.2	\$ 575.00	\$ 115.00	\$ 115.00	0.2
2/17/2015	MCC	Reviewed docket entry regarding motion to certify legal questions and conferences with Ms. Chandler and Mr. Marshall regarding same.	0.4	\$ 625.00	\$ 250.00		
2/17/2015	TJM	Analyzed issues regarding strategy on appeal [.2].	0.2	\$ 675.00	\$ 135.00		
3/2/2015	MCC	Reviewed request for extension and reviewed rule regarding extensions.	0.2	\$ 625.00	\$ 125.00		
3/3/2015	EBN	Telephone conference with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
3/3/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
3/5/2015	TJM	Analyzed issues regarding recent Ninth Circuit decision on class certification and possibility of appealing denial of certification on off-the-clock claim [.1].	0.1	\$ 675.00	\$ 67.50		
3/13/2015	CED	Created on opt-in call spreadsheet; compiled call questions for contacting class members; answered questions for potential class members regarding opt-in forms; redacted contact information from opt-in forms.	7.5	\$ 150.00	\$ 1,125.00		
3/16/2015	CED	Listened and responded to voicemails left by class members; compiled call information in spreadsheet; redacted personal information from opt-in forms.	7.7	\$ 150.00	\$ 1,155.00		
3/19/2015	CED	Listened to voicemails left by class members; returned calls; redacted personal information from opt-in forms.	1.5	\$ 150.00	\$ 225.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/20/2015	CED	Returned calls to class members to answer questions about opting in; redacted personal information from opt-in forms to serve to defense.	1.5	\$ 150.00	\$ 225.00		
3/23/2015	MCC	Phone call with Ms. Hill regarding case status.	0.1	\$ 625.00	\$ 62.50		
3/30/2015	CED	Listened and responded to voicemails left by class members; compiled online opt-ins from email; redacted personal information from opt-in forms; updated call sheet to include questions from class members.	2.6	\$ 150.00	\$ 390.00		
4/1/2015	MCC	Email correspondence regarding call from XCS employee.	0.1	\$ 625.00	\$ 62.50		
4/2/2015	MCC	Attempted phone call to class member regarding work issues.	0.1	\$ 625.00	\$ 62.50		
4/7/2015	MCC	Analyzed class member issues and phone call to class member.	0.1	\$ 625.00	\$ 62.50		
4/14/2015	MCC	Reviewed rules regarding appeal and record on appeal and began reviewing excerpts of record [.4]; began reviewing and analyzing Xerox's brief [.5].	0.9	\$ 625.00	\$ 562.50		
4/15/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
4/15/2015	MCC	Continued reviewing and analyzing Xerox's appellate brief.	3.2	\$ 625.00	\$ 2,000.00		
4/16/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
4/16/2015	MCC	Worked on outline for response to Xerox's appellate brief.	1.6	\$ 625.00	\$ 1,000.00		
4/17/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
4/17/2015	MCC	Worked on outline for response to Xerox's appellate brief.	2.5	\$ 625.00	\$ 1,562.50		
4/20/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
4/20/2015	MCC	Worked on outline for response to 9th circuit brief.	2.5	\$ 625.00	\$ 1,562.50		
4/21/2015	HKO	Assembled case management notebook .	0.7	\$ 150.00	\$ 105.00	\$ 105.00	0.7
4/21/2015	MCC	Conference with Mr. Marshall regarding arguments for 9th circuit brief [.3]; phone call with co-counsel and Mr. Marshall and follow-up conference with Mr. Marshall regarding strategy for 9th circuit brief [1]; researched legal issues and worked on outline for 9th circuit brief [2.5].	3.8	\$ 625.00	\$ 2,375.00		
4/21/2015	TJM	Reviewed defendants' opening brief on appeal and analyzed issues regarding same [1.3]; telephone conference with co-counsel regarding same [.8].	2.1	\$ 675.00	\$ 1,417.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/22/2015	MCC	Worked on outline of arguments for 9th circuit brief, including research of cases cited by Defendants.	2.7	\$ 625.00	\$ 1,687.50		
4/23/2015	MCC	Researched case law for response to Xerox's 9th circuit brief.	1.1	\$ 625.00	\$ 687.50		
4/24/2015	HMR	Prepared reply brief.	1.0	\$ 200.00	\$ 200.00	\$ 200.00	1.0
4/24/2015	MCC	Worked on outline for 9th circuit brief.	5.1	\$ 625.00	\$ 3,187.50		
4/27/2015	MCC	Worked on 9th circuit brief.	0.9	\$ 625.00	\$ 562.50		
4/29/2015	MCC	Worked on 9th circuit brief.	1.9	\$ 625.00	\$ 1,187.50		
4/30/2015	LLN	Conference regarding research assignment.	0.1	\$ 200.00	\$ 20.00	\$ 20.00	0.1
4/30/2015	MCC	Worked on 9th circuit brief.	6.4	\$ 625.00	\$ 4,000.00		
5/1/2015	LLN	Researched issues related to factual evidence introduced for the first time on motion for reconsideration.	2.7	\$ 200.00	\$ 540.00	\$ 540.00	2.7
5/1/2015	MCC	Worked on 9th Circuit brief [5.4]; phone call with Mr. Ennis regarding potential class member [.2].	5.6	\$ 625.00	\$ 3,500.00		
5/1/2015	TJM	Analyzed issues regarding appeal [.2].	0.2	\$ 675.00	\$ 135.00		
5/2/2015	MCC	Worked on 9th Circuit brief.	2.6	\$ 625.00	\$ 1,625.00		
5/3/2015	MCC	Worked on 9th Circuit brief.	4.5	\$ 625.00	\$ 2,812.50		
5/4/2015	MCC	Worked on 9th Circuit brief.	5.6	\$ 625.00	\$ 3,500.00		
5/6/2015	MCC	Email correspondence regarding research for 9th Circuit brief.	0.1	\$ 625.00	\$ 62.50		
5/7/2015	EBN	Worked on supplemental excerpts of record and tables of contents.	1.0	\$ 250.00	\$ 250.00		
5/7/2015	HMR	Drafted Notification of Filing under seal; cover sheets for supplemental record	1.0	\$ 200.00	\$ 200.00	\$ 200.00	1.0
5/7/2015	MCC	Worked on supplemental excerpts of record and tables and email correspondence regarding filings with 9th circuit brief.	2.7	\$ 625.00	\$ 1,687.50		
5/7/2015	TJM	Analyzed issues regarding excerpts of record [.3].	0.3	\$ 675.00	\$ 202.50		
5/8/2015	EBN	Worked on supplemental excerpts of record index.	0.5	\$ 250.00	\$ 125.00		
5/8/2015	MCC	Worked on notification of sealing and related documents [.8]; worked on appellee's brief [4.4].	5.2	\$ 625.00	\$ 3,250.00		
5/11/2015	MCC	Worked on addition to 9th circuit brief [.8]; conference regarding 9th circuit brief [.1].	0.9	\$ 625.00	\$ 562.50		
5/11/2015	TJM	Worked on answering brief for appeal from summary judgment [2.0].	2.0	\$ 675.00	\$ 1,350.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/12/2015	HMR	Drafted Table of Contents, Table of Authorities; formatted Certificate of Compliance; Updated Addendum; researched statutes, regulations, other authorities, DLI admin polices; saved and printed for Appellee's Reply Brief	4.0	\$ 200.00	\$ 800.00	\$ 800.00	4.0
5/12/2015	MCC	Worked on 9th circuit brief and conferences and email correspondence regarding same.	7.2	\$ 625.00	\$ 4,500.00		
5/12/2015	TJM	Worked on answering brief for appeal from summary judgment [1.5]; analyzed issues regarding same [.6].	2.1	\$ 675.00	\$ 1,417.50		
5/13/2015	BKK	Reviewed and revised Ninth Circuit brief supporting materials.	6.2	\$ 200.00	\$ 1,240.00		
5/13/2015	HKO	Worked on exhibits for Ninth Circuit brief.	0.5	\$ 150.00	\$ 75.00	\$ 75.00	0.5
5/13/2015	HMR	Finalized Notification of Filing under seal, supplemental excerpts - volume 2, appellee's brief, supplemental excerpts volume 1; efiled with court	4.5	\$ 200.00	\$ 900.00	\$ 900.00	4.5
5/13/2015	MCC	Worked on 9th Circuit brief.	6.2	\$ 625.00	\$ 3,875.00		
5/13/2015	REH	Worked on appellate brief.	2.0	\$ 150.00	\$ 300.00	\$ 300.00	2.0
5/13/2015	TJM	Analyzed issues regarding answering brief on appeal [.2].	0.2	\$ 675.00	\$ 135.00		
5/14/2015	HMR	Contacted Teris regarding copying of brief for court copies and counsel copies	0.5	\$ 200.00	\$ 100.00	\$ 100.00	0.5
5/14/2015	MCC	Analyzed deadlines for filing paper copies of brief and email regarding same [.2]; analyzed argument that -021 is invalid [.1].	0.3	\$ 625.00	\$ 187.50		
5/15/2015	HKO	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
5/15/2015	HMR	Sent brief and supplemental excerpts volume 1 to Teris for production of copies for court and opposing counsel	1.5	\$ 200.00	\$ 300.00	\$ 300.00	1.5
5/18/2015	HMR	Updated Certification and Brief; resent to Teris for copies to court and opposing counsel	1.0	\$ 200.00	\$ 200.00	\$ 200.00	1.0
5/18/2015	MCC	Reviewed rules regarding filing and service of paper copies of supplemental excerpts and brief and long email regarding same.	0.9	\$ 625.00	\$ 562.50		
5/20/2015	MCC	Analyzed deadline for paper copies of excerpts and brief and email re same [.2]; analyzed supplemental excerpts [.1].	0.3	\$ 625.00	\$ 187.50		
5/22/2015	MCC	Phone call with Ms. Hill re case status [.1]; reviewed notices regarding Defendants' request for extension and analyzed rule allowing extensions [.2].	0.3	\$ 625.00	\$ 187.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/26/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
5/28/2015	MCC	Conference with Ms. Besso regarding 9th Circuit brief and Washington Law Help website language [.3]; analyzed issues for oral argument [.3]; reviewed final 9th circuit brief in preparation for oral argument [.3].	0.9	\$ 625.00	\$ 562.50		
5/29/2015	MCC	Email correspondence regarding call from potential witness.	0.1	\$ 625.00	\$ 62.50		
6/2/2015	MCC	Attempted to reach witness (former supervisor) and analyzed case strategy.	0.2	\$ 625.00	\$ 125.00		
6/4/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
6/11/2015	MCC	Analyzed call from potential witness and attempted call back (VM).	0.1	\$ 625.00	\$ 62.50		
6/25/2015	HKO	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
6/25/2015	MCC	Began reviewing reply brief filed by Xerox [1.4]; conference with Mr. Marshall regarding same [.3].	1.7	\$ 625.00	\$ 1,062.50		
6/30/2015	MCC	Email correspondence regarding appeal notebook.	0.1	\$ 625.00	\$ 62.50		
7/7/2015	JJB	Worked on case management.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
7/22/2015	MCC	Worked on case update for class members [.2].	0.2	\$ 625.00	\$ 125.00		
7/24/2015	EBN	Worked on document production management.	0.2	\$ 250.00	\$ 50.00		
7/25/2015	JJB	Worked on document database management.	0.7	\$ 250.00	\$ 175.00		
8/11/2015	HMR	Worked on notice of supplemental authority.	1.0	\$ 200.00	\$ 200.00		
8/11/2015	MCC	Researched rule on notice of supplemental authority and email regarding same.	0.3	\$ 625.00	\$ 187.50		
8/12/2015	MCC	Reviewed supplemental authority rule and drafted notice of supplemental authority.	1.5	\$ 625.00	\$ 937.50		
8/13/2015	EBN	Left messages for class members regarding case status; telephone conference with class member regarding same; updated class member addresses; updated call log.	0.5	\$ 250.00	\$ 125.00		
8/13/2015	HMR	Worked on plaintiffs' notice of supplemental authority.	0.5	\$ 200.00	\$ 100.00		
8/13/2015	MCC	Worked on notice of supplemental authority [.7].	0.7	\$ 625.00	\$ 437.50		
8/13/2015	TJM	Analyzed issues regarding supplemental notice to Ninth Circuit of Sakuma decision [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/14/2015	HMR	Finalized notice of supplemental authority; electronically filed and mailed to Clerk.	1.0	\$ 200.00	\$ 200.00	\$ 200.00	1.0
8/18/2015	MCC	Reviewed Xerox's response to notice of supplemental authority.	0.2	\$ 625.00	\$ 125.00		
8/26/2015	BKK	Telephone conference with Ninth Circuit clerk regarding August 14, 2015 letter.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
10/20/2015	EBN	Worked on list of ineligible class members for mail merge correspondence.	2.5	\$ 250.00	\$ 625.00		
12/14/2015	MCC	Phone call with Ms. Hill re case status.	0.1	\$ 625.00	\$ 62.50		
5/9/2016	EBN	Telephone conference with class member regarding status of lawsuit.	0.2	\$ 250.00	\$ 50.00		
5/23/2016	HKO	Worked on docketing.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
5/27/2016	MCC	Reviewed 7th Circuit opinion on arbitration of class claims and analyzed effect on Plaintiff's claims.	0.4	\$ 625.00	\$ 250.00		
5/27/2016	TJM	Analyzed issues regarding impact of Seventh Circuit's decision on unenforceability of arbitration agreements with employees and impact on case [.5].	0.5	\$ 675.00	\$ 337.50		
6/1/2016	MCC	Email correspondence regarding dispute resolution plan.	0.2	\$ 625.00	\$ 125.00		
6/2/2016	MCC	Analyzed dispute resolution plan issue.	0.2	\$ 625.00	\$ 125.00		
6/7/2016	BKK	Email correspondence regarding 11/24/15 hearing transcript.	0.1	\$ 200.00	\$ 20.00	\$ 20.00	0.1
6/14/2016	MCC	Received call from Tiffany Hill regarding settlement status.	0.1	\$ 625.00	\$ 62.50		
6/21/2016	EBN	Telephone conference with class member regarding case status.	0.3	\$ 250.00	\$ 75.00		
6/28/2016	HMR	Spoke with clerk's office regarding status of scheduling oral argument on briefing.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
8/2/2016	EBN	Left voicemails for class members regarding case status.	0.2	\$ 250.00	\$ 50.00		
8/14/2016	MCC	Analyzed effect of new L&I policy on claims for separate pay outside of ABC pay.	0.2	\$ 625.00	\$ 125.00		
8/17/2016	MCC	Analyzed rest break claim.	0.1	\$ 625.00	\$ 62.50		
8/30/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
8/30/2016	MCC	Reviewed notice regarding oral argument and emails regarding same.	0.3	\$ 625.00	\$ 187.50		
8/30/2016	RDA	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/1/2016	MCC	Email regarding oral argument availability.	0.1	\$ 625.00	\$ 62.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/25/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
10/27/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
10/27/2016	RDA	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
11/2/2016	EBN	Email correspondence to class member regarding case status.	0.3	\$ 250.00	\$ 75.00		
11/4/2016	MCC	Reviewed email from court regarding request for Volume 2 of supplemental excerpts of records, located electronic copy of volume 2, and attempted to OCR it; troubleshooting OCR issue with Ms. Rota; reviewed searchable document and emailed it to 9th Circuit representative.	0.6	\$ 625.00	\$ 375.00		
11/28/2016	MCC	Reviewed notice regarding oral argument and email regarding same.	0.2	\$ 625.00	\$ 125.00		
11/29/2016	HMR	Worked on Acknowledgment of Hearing Notice.	0.3	\$ 200.00	\$ 60.00	\$ 60.00	0.3
11/29/2016	MCC	Reviewed notice regarding oral argument and proposed revisions; email correspondence regarding oral argument.	0.4	\$ 625.00	\$ 250.00		
11/29/2016	REH	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
11/30/2016	HMR	Finalized acknowledgement of hearing notice; electronically filed same.	0.3	\$ 200.00	\$ 60.00	\$ 60.00	0.3
11/30/2016	MCC	Worked on acknowledgment of oral argument date and emails regarding same [.3].	0.3	\$ 625.00	\$ 187.50		
11/30/2016	RDA	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
12/1/2016	MCC	Reviewed Xerox's filing.	0.1	\$ 625.00	\$ 62.50		
12/6/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
1/4/2017	MCC	Began analyzing issues for oral argument.	0.1	\$ 625.00	\$ 62.50		
1/6/2017	MCC	Reviewed Defendants' notice of supplemental authority.	0.2	\$ 625.00	\$ 125.00		
1/8/2017	MCC	Analyzed issues for response to supplemental authority.	0.1	\$ 625.00	\$ 62.50		
1/8/2017	TJM	Reviewed supplemental authorities submitted by Defendants and drafted email to co-counsel regarding analysis of and proposed response to same [.6].	0.6	\$ 675.00	\$ 405.00		
1/9/2017	MCC	Reviewed draft response to supplemental authorities.	0.1	\$ 625.00	\$ 62.50		
1/10/2017	MCC	Reviewed Xerox's notice of supplemental authorities, reviewed authorities, and worked on revisions of draft response.	2.2	\$ 625.00	\$ 1,375.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/10/2017	TJM	Worked on letter to Ninth Circuit regarding defendants' supplemental authority [.2].	0.2	\$ 675.00	\$ 135.00		
1/11/2017	MCC	Email regarding response to supplemental authority.	0.1	\$ 625.00	\$ 62.50		
1/13/2017	HKO	Prepared notebook for appellate hearing.	0.6	\$ 150.00	\$ 90.00	\$ 90.00	0.6
1/13/2017	MCC	Began analyzing arguments in preparation for oral argument.	0.1	\$ 625.00	\$ 62.50		
1/15/2017	MCC	Began reviewing briefs in preparation for oral argument.	1.4	\$ 625.00	\$ 875.00		
1/16/2017	MCC	Continued reviewing appellate briefs in preparation for oral argument.	2.6	\$ 625.00	\$ 1,625.00		
1/17/2017	HKO	Downloaded and printed case law for appellate briefing [2.1].	2.1	\$ 150.00	\$ 315.00	\$ 315.00	2.1
1/17/2017	MCC	Began analyzing issues for Ninth Circuit oral argument.	0.5	\$ 625.00	\$ 312.50		
1/17/2017	TJM	Worked on plan for mooted hearing on appeal [.1].	0.1	\$ 675.00	\$ 67.50		
1/18/2017	MCC	Analyzed issues for oral argument.	0.1	\$ 625.00	\$ 62.50		
1/19/2017	MCC	Analyzed issues for oral argument.	1.7	\$ 625.00	\$ 1,062.50		
1/20/2017	MCC	Reviewed briefs filed in Ninth Circuit in preparation for oral argument and worked on outline of argument.	5.3	\$ 625.00	\$ 3,312.50		
1/21/2017	MCC	Prepared for oral argument.	0.4	\$ 625.00	\$ 250.00		
1/22/2017	MCC	Prepared for oral argument and worked on oral argument outline.	2.0	\$ 625.00	\$ 1,250.00		
1/23/2017	MCC	Worked on oral argument outline, reviewed record and case law, and prepared for oral argument.	4.8	\$ 625.00	\$ 3,000.00		
1/24/2017	MCC	Prepared for oral argument [.1]; reviewed record and administrative policies in preparation for oral argument [2.1].	2.2	\$ 625.00	\$ 1,375.00		
1/25/2017	MCC	Prepared for oral argument and continued reviewing excerpts of record.	2.0	\$ 625.00	\$ 1,250.00		
1/26/2017	MCC	Prepared for oral argument.	1.1	\$ 625.00	\$ 687.50		
1/28/2017	MCC	Prepared for oral argument.	0.5	\$ 625.00	\$ 312.50		
1/29/2017	MCC	Prepared for oral argument and conducted informal moot session.	1.0	\$ 625.00	\$ 625.00		
1/30/2017	MCC	Reviewed certified question briefs and relevant case law and revised outline in preparation for oral argment.	2.5	\$ 625.00	\$ 1,562.50		
1/31/2017	BAM	Researched and summarized prior decisions by panel of Ninth Circuit judges that touch on employment law, especially wage and hour law.	0.8	\$ 400.00	\$ 320.00	\$ 320.00	0.8

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/31/2017	HKO	Worked on case management notebook.	0.8	\$ 150.00	\$ 120.00	\$ 120.00	0.8
1/31/2017	MCC	Worked on oral argument outline, prepared for oral argument, and participated in moot oral argument session (including travel to session).	6.8	\$ 625.00	\$ 4,250.00		
2/1/2017	BAM	Researched and summarized prior decisions by panel of Ninth Circuit judges that touch on employment law, especially wage and hour law.	1.8	\$ 400.00	\$ 720.00	\$ 720.00	1.8
2/1/2017	HKO	Worked on case management notebook.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
2/1/2017	MCC	Worked on oral argument outline, reviewed cases and record, and prepared for oral argument.	3.9	\$ 625.00	\$ 2,437.50		
2/2/2017	HKO	Made case management notebook for oral argument.	0.4	\$ 150.00	\$ 60.00	\$ 60.00	0.4
2/2/2017	MCC	Prepared for Ninth Circuit oral argument, including work on outline and review of case law and record.	10.0	\$ 625.00	\$ 6,250.00		
2/2/2017	TJM	Reviewed materials and worked on outline of issues to cover in argument before Ninth Circuit [2.0].	2.0	\$ 675.00	\$ 1,350.00		
2/3/2017	MCC	Prepared for oral argument, conducted moot oral argument session, and worked on outline of oral argument and key points based on feedback from moot session.	7.9	\$ 625.00	\$ 4,937.50		
2/3/2017	TJM	Prepared for moot of argument before Ninth Circuit [.8]; participated in same [2.9]; analyzed issues regarding same [.4].	4.1	\$ 675.00	\$ 2,767.50		
2/4/2017	MCC	Prepared for Ninth Circuit oral argument.	4.0	\$ 625.00	\$ 2,500.00		
2/5/2017	MCC	Prepared for oral argument, including practice of argument and review of case law.	5.7	\$ 625.00	\$ 3,562.50		
2/6/2017	MCC	Prepared for oral argument.	7.8	\$ 625.00	\$ 4,875.00		
2/6/2017	TJM	Email correspondence with co-counsel regarding rescheduling of argument on appeal [.1].	0.1	\$ 675.00	\$ 67.50		
2/7/2017	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
2/7/2017	MCC	Prepared for oral argument and presented oral argument to Ninth Circuit and traveled back to office [6.3]; debrief email to Ms. Hill regarding oral argument [.5].	6.8	\$ 625.00	\$ 4,250.00		
2/7/2017	TJM	Traveled to, attended, and returned from oral argument before Ninth Circuit [3.0]; meeting with co-counsel regarding same [.3].	3.3	\$ 675.00	\$ 2,227.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/8/2017	MCC	Phone call with Tiffany Hill regarding oral argument and case status.	0.5	\$ 625.00	\$ 312.50		
2/10/2017	EBN	Telephone conference with class member regarding case status; email correspondence to class member regarding same.	0.4	\$ 250.00	\$ 100.00		
2/12/2017	MCC	Reviewed Fowler v. Lanier and considered need for notice of supplemental authority.	0.4	\$ 625.00	\$ 250.00		
2/14/2017	MCC	Reviewed order from Court regarding sealed documents and email regarding same [.2]; analyzed Fowler Packing case and emailed co-counsel regarding potential need for supplemental authority notice [.9].	1.1	\$ 625.00	\$ 687.50		
2/14/2017	TJM	Analyzed issues regarding court's order to show cause as to maintaining documents under seal and email correspondence with co-counsel regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
2/15/2017	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
2/15/2017	MCC	Analyzed potential supplemental authority from Ninth Circuit.	0.2	\$ 625.00	\$ 125.00		
2/15/2017	TJM	Reviewed Ninth Circuit case defining piecework, analyzed issues regarding citation to same as supplemental authority, and email correspondence with co-counsel regarding analysis [.4].	0.4	\$ 675.00	\$ 270.00		
4/11/2017	EBN	Telephone conference with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
8/7/2017	STL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
8/7/2017	TJM	Reviewed opinion of Ninth Circuit certifying question to Washington State Supreme Court, analyzed issues regarding same [.3]; email correspondence with co-counsel regarding same [.1]; telephone call from Politico reporter regarding same [.1].	0.5	\$ 675.00	\$ 337.50		
8/8/2017	STL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
8/10/2017	TJM	Email to client regarding status of lawsuit and certification of issue to Washington Supreme Court [.2].	0.2	\$ 675.00	\$ 135.00		
8/15/2017	TJM	Email correspondence with co-counsel regarding certification of issue to Washington Supreme Court [.1].	0.1	\$ 675.00	\$ 67.50		
8/17/2017	STL	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/19/2017	TJM	Analyzed issues regarding opposing counsel's request to adjust briefing schedule on appeal before Washington Supreme Court [.3]; email correspondence with co-counsel regarding same [.1].	0.4	\$ 675.00	\$ 270.00		
8/21/2017	TJM	Email correspondence with opposing counsel regarding proposed revisions to briefing schedule on certified question [.1].	0.1	\$ 675.00	\$ 67.50		
8/22/2017	TJM	Prepared for telephone conference with co-counsel regarding extension of briefing schedule, preparations for briefing certified question, and potential amici curiae [.1]; participated in same [.3]; email correspondence with co-counsel regarding briefing on issues related to certified question [.2]; researched and analyzed issues regarding same [.3]; analyzed issues regarding proposed briefing schedule and email correspondence with opposing counsel regarding same [.1].	1.0	\$ 675.00	\$ 675.00		
8/23/2017	TJM	Worked on motion to extend deadlines for briefing certified question and email correspondence with opposing counsel regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
8/24/2017	STL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
8/29/2017	TJM	Analyzed issues regarding draft joint status report and email correspondence with co-counsel and opposing counsel regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
10/3/2017	TJM	Analyzed issues regarding plan for answering defendants' opening brief on certified question [.2].	0.2	\$ 675.00	\$ 135.00		
10/4/2017	TJM	Reviewed defendants' opening brief on certified question to Washington Supreme Court and analyzed issues regarding answer to same [.3].	0.3	\$ 675.00	\$ 202.50		
10/5/2017	TJM	Telephone conference with co-counsel regarding case strategy issues [.3].	0.3	\$ 675.00	\$ 202.50		
10/11/2017	TJM	Worked on case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
10/12/2017	TJM	Reviewed opening brief on certified question and analyzed issues regarding same [1.5].	1.5	\$ 675.00	\$ 1,012.50		
10/20/2017	EBN	Forwarded appellate excerpts of record to co-counsel.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/20/2017	TJM	Analyzed issues regarding briefing on certified question to Washington Supreme Court [.1].	0.1	\$ 675.00	\$ 67.50		
10/21/2017	TJM	Continued analyzing Defendants' opening brief and researched and analyzed issues regarding same [3.2].	3.2	\$ 675.00	\$ 2,160.00		
10/22/2017	TJM	Continued analyzing Defendants' opening brief and researched and analyzed issues regarding same [1.3].	1.3	\$ 675.00	\$ 877.50		
10/23/2017	TJM	Continued reviewing materials and working arguments for answer to opening brief on question certified to Washington Supreme Court [3.4].	3.4	\$ 675.00	\$ 2,295.00		
10/24/2017	TJM	Researched and analyzed issues regarding arguments in answering brief on question certified to Washington Supreme Court [1.5]; researched and analyzed issues regarding factual background for answering brief [1.3].	2.8	\$ 675.00	\$ 1,890.00		
10/25/2017	TJM	Continued working on factual background development for answering brief on certified question [1.3].	1.3	\$ 675.00	\$ 877.50		
10/26/2017	TJM	Worked on answering brief to Washington Supreme Court and researched and analyzed issues regarding same [3.5].	3.5	\$ 675.00	\$ 2,362.50		
10/31/2017	TJM	Worked on answering brief on question certified to Washington Supreme Court [7.7].	7.7	\$ 675.00	\$ 5,197.50		
11/1/2017	TJM	Worked on answering brief on question certified to Washington Supreme Court [1.8]; email correspondence with client regarding status of case [.1].	1.9	\$ 675.00	\$ 1,282.50		
11/2/2017	TJM	Worked on answering brief on question certified to Washington Supreme Court [.3].	0.3	\$ 675.00	\$ 202.50		
11/3/2017	TJM	Worked on answering brief on question certified to Washington Supreme Court and researched and analyzed issues regarding same [2.2].	2.2	\$ 675.00	\$ 1,485.00		
11/5/2017	TJM	Worked on answering brief on certified question to Washington Supreme Court [6.8].	6.8	\$ 675.00	\$ 4,590.00		
11/6/2017	HMR	Reviewed appeals docket.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
11/6/2017	TJM	Finalized answering brief on question certified to Washington Supreme Court and worked on filing of same [1.2].	1.2	\$ 675.00	\$ 810.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/7/2017	TJM	Email correspondence with client regarding briefing in appeal before Washington Supreme Court [.1]; analyzed issues regarding amicus briefing [.2]; email to Mr. Mark regarding request for same [.2].	0.5	\$ 675.00	\$ 337.50		
11/9/2017	STL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
11/9/2017	TJM	Analyzed issues regarding proposed dates for oral argument and email correspondence with co-counsel regarding same 1; email correspondence with potential amicus regarding same and likely deadline for amicus briefs [.1]; telephone conference with Mr. MacLeod regarding status of case [.2].	0.3	\$ 675.00	\$ 202.50		
11/19/2017	TJM	Reviewed email from court clerk setting date for oral argument before Washington Supreme Court and docketed same [.1].	0.1	\$ 675.00	\$ 67.50		
11/20/2017	STL	Worked on docketing.	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
11/21/2017	TJM	Telephone conference with Mr. Mark regarding amicus brief [.1]; analyzed issues regarding same [.1].	0.2	\$ 675.00	\$ 135.00		
12/18/2017	TJM	Reviewed reply brief on questions certified to Washington Supreme Court and researched and analyzed issues regarding same [0.9]; email correspondence with Mr. Needle regarding amicus brief from WELA [.1].	1.0	\$ 675.00	\$ 675.00		
12/21/2017	TJM	Analyzed issues regarding arguments before Washington Supreme Court [.5].	0.5	\$ 675.00	\$ 337.50		
12/22/2017	TJM	Worked on analysis of arguments for question certified to Washington Supreme Court [.2].	0.2	\$ 675.00	\$ 135.00		
12/28/2017	TJM	Email correspondence with client regarding status of case and hearing before Washington Supreme Court [.1].	0.1	\$ 675.00	\$ 67.50		
1/17/2018	TJM	Reviewed briefing and analyzed issues regarding issues for amicus curiae to address [.7]; telephone conference with Mr. Mark, and co-counsel regarding same [1.0]; gathered materials for amicus curiae and researched and analyzed issues regarding arguments to be addressed [1.5].	3.2	\$ 675.00	\$ 2,160.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/18/2018	TJM	Email correspondence with Mr. Mark regarding background information for amicus support [.1]; analyzed issues regarding same [.2]; researched and analyzed issues regarding definitions of piecework and piece-rate and drafted memorandum to co-counsel and amicus regarding same [1.2].	1.5	\$ 675.00	\$ 1,012.50		
1/23/2018	BMD	Researched state law decisions regarding minimum wage compliance [4.2]; drafted email summarizing research [.3].	4.5	\$ 450.00	\$ 2,025.00	\$ 2,025.00	4.5
1/24/2018	TJM	Researched and analyzed issues arguments raised in amicus brief [2.0].	2.0	\$ 675.00	\$ 1,350.00		
1/28/2018	TJM	Researched and analyzed issues regarding amicus brief from Wage Claim Project [.9].	0.9	\$ 675.00	\$ 607.50		
3/1/2018	BMD	Reviewed and analyzed research regarding per hour approach to minimum wage compliance [.3].	0.3	\$ 450.00	\$ 135.00	\$ 135.00	0.3
3/1/2018	JAL	Worked on case management binder.	0.9	\$ 150.00	\$ 135.00	\$ 135.00	0.9
3/1/2018	TJM	Worked on preparations for oral argument [.4].	0.4	\$ 675.00	\$ 270.00		
3/4/2018	TJM	Reviewed materials in preparation for oral argument before Washington Supreme Court and researched and analyzed issues regarding same [1.9].	1.9	\$ 675.00	\$ 1,282.50		
3/5/2018	TJM	Reviewed materials and researched and analyzed issues regarding arguments raised in same in preparation for oral argument before Washington Supreme Court [2.2]; worked on logistics of moot session and email correspondence with various individuals regarding same [.3].	2.5	\$ 675.00	\$ 1,687.50		
3/8/2018	TJM	Reviewed materials and analyzed issues in preparation for argument before Washington Supreme Court [3.8].	3.8	\$ 675.00	\$ 2,565.00		
3/10/2018	TJM	Continued reviewing materials and analyzed issues in preparation for argument before Washington Supreme Court and worked on outline for same [4.3].	4.3	\$ 675.00	\$ 2,902.50		
3/11/2018	TJM	Prepared for argument before Washington Supreme Court and worked on outline for same [7.1].	7.1	\$ 675.00	\$ 4,792.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/12/2018	TJM	Continued reviewing materials and analyzed issues in preparation for argument before Washington Supreme Court [1.4]; traveled to, participated in, and returned from moot of argument before Washington Supreme Court [3.1]	4.5	\$ 675.00	\$ 3,037.50		
3/13/2018	TJM	Worked on outline for argument before Washington Supreme Court and reviewed materials and researched and analyzed issues for same [8.2].	8.2	\$ 675.00	\$ 5,535.00		
3/14/2018	TJM	Prepared for argument before Washington Supreme Court and worked on outline for same [8.4].	8.4	\$ 675.00	\$ 5,670.00		
3/15/2018	TJM	Prepared for argument before Washington Supreme Court, traveled to same, participated in same, and returned from same [8.6].	8.6	\$ 675.00	\$ 5,805.00		
3/22/2018	TJM	Email correspondence with co-counsel and opposing counsel regarding joint status report [.1].	0.1	\$ 675.00	\$ 67.50		
4/3/2018	STL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
6/18/2018	TJM	Email correspondence with client regarding status of decision from Washington Supreme Court [.1].	0.1	\$ 675.00	\$ 67.50		
9/20/2018	TJM	Reviewed decision from Washington Supreme Court and analyzed issues regarding same [.8]; telephone conference with Bloomberg reporter regarding same [.2]; telephone conference with co-counsel regarding same [.2]; email correspondence with client regarding decision from Washington Supreme Court [.1].	1.3	\$ 675.00	\$ 877.50		
9/26/2018	TJM	Researched and analyzed issues regarding cost bill and worked on same [.2].	0.2	\$ 675.00	\$ 135.00		
9/27/2018	BKK	Reviewed appellate rules; prepared draft of cost bill and supporting Marshall declaration.	0.7	\$ 200.00	\$ 140.00		
9/27/2018	JAL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/27/2018	TJM	Worked on cost bill and researched and analyzed issues regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
9/28/2018	BKK	Reviewed, revised and finalized cost bill and Marshall supporting declaration; assembled exhibit; arranged filing and service.	0.1	\$ 200.00	\$ 20.00	\$ 20.00	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/1/2018	TJM	Reviewed defendants' cost bill and analyzed issues regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
10/4/2018	TJM	Analyzed issues regarding substitution of Conduent entities in place of Xerox entities [.1].	0.1	\$ 675.00	\$ 67.50		
10/11/2018	TJM	Reviewed ruling on costs and analyzed issues regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
10/27/2018	TJM	Email correspondence with co-counsel regarding joint status report [.1].	0.1	\$ 675.00	\$ 67.50		
11/5/2018	TJM	Analyzed issues regarding proceedings in Ninth Circuit after answer to certified question [.2].	0.2	\$ 675.00	\$ 135.00		
11/9/2018	TJM	Reviewed defendants' proposed revisions to joint status report and analyzed issues regarding same [.1]; worked on revisions to same [.1].	0.2	\$ 675.00	\$ 135.00		
11/13/2018	TJM	Email correspondence with co-counsel regarding joint status report dispute [.1].	0.1	\$ 675.00	\$ 67.50		
11/14/2018	JAL	Worked on docketing.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
11/28/2018	JAL	Worked on docketing.	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
11/29/2018	TJM	Analyzed issues regarding Ninth Circuit's request for letter briefs on impact of Washington Supreme Court decision and email correspondence with co-counsel regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
12/1/2018	TJM	Email correspondence with client regarding status of case and explanation of decisions [.3].	0.3	\$ 675.00	\$ 202.50		
12/17/2018	TJM	Reviewed previous decisions and briefing in preparation for supplemental letter brief to Ninth Circuit and researched and analyzed issues regarding same [2.1].	2.1	\$ 675.00	\$ 1,417.50		
12/18/2018	TJM	Worked on supplemental letter brief to Ninth Circuit and researched and analyzed issues regarding same [4.2].	4.2	\$ 675.00	\$ 2,835.00		
12/19/2018	TJM	Worked on supplemental letter brief [1.9].	1.9	\$ 675.00	\$ 1,282.50		
12/24/2018	TJM	Worked on corrections to supplemental letter brief [1.6]; email correspondence with court clerk regarding same [.1].	1.7	\$ 675.00	\$ 1,147.50		
12/26/2018	TJM	Reviewed defendants' supplemental letter brief and analyzed issues regarding same [.2]; worked on case management issues [.1].	0.3	\$ 675.00	\$ 202.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/27/2018	JAL	Worked on docketing.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
12/27/2018	TJM	Reviewed defendants' motion for leave to file overlength brief and supporting declaration and analyzed issues regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
12/28/2018	TJM	Reviewed defendants' corrected supplemental letter brief and analyzed issues regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
3/19/2019	TJM	Email correspondence with client regarding status of decision from Ninth Circuit [.1].	0.1	\$ 675.00	\$ 67.50		
3/20/2019	JN	Email with class member regarding case.	0.4	\$ 250.00	\$ 100.00		
4/1/2019	JN	Telephone conference with class member.	0.4	\$ 250.00	\$ 100.00		
4/23/2019	TJM	Analyzed issues regarding status of decision from Ninth Circuit [.1].	0.1	\$ 675.00	\$ 67.50		
5/9/2019	TJM	Email correspondence with client regarding status of Ninth Circuit's ruling [.1].	0.1	\$ 675.00	\$ 67.50		
5/13/2019	TJM	Analyzed issues regarding joint status report deadline [.1]; drafted joint status report [.2]; analyzed issues regarding preservation of documents showing Conduent is responsible for any liabilities [.1]; email correspondence with co-counsel and opposing counsel regarding joint status report and preservation of documents [.1].	0.5	\$ 675.00	\$ 337.50		
5/28/2019	JN	Voice mail from class member regarding status of suit.[.1]	0.1	\$ 250.00	\$ 25.00		
6/6/2019	JN	Telephone conference and email with class member regarding case status.	0.2	\$ 250.00	\$ 50.00		
6/11/2019	JAL	Worked on docketing [0.4].	0.4	\$ 150.00	\$ 60.00	\$ 60.00	0.4
6/19/2019	TJM	Analyzed issues regarding next steps after affirmance by Ninth Circuit and email correspondence with co-counsel regarding same [.8]; email correspondence with client regarding same [.3].	1.1	\$ 675.00	\$ 742.50		
6/20/2019	TJM	Telephone conference with client regarding Ninth Circuit decision and next steps [.3]; worked on updating class member contact information [.1]; analyzed issues regarding case strategy [.1]; telephone conference with co-counsel regarding same, action items, and distribution of work [.5].	1.0	\$ 675.00	\$ 675.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/8/2019	TJM	Analyzed issues regarding next steps in litigation [.1].	0.1	\$ 675.00	\$ 67.50		
7/9/2019	TJM	Prepared for telephone conference with co-counsel regarding case strategy issues [.1]; participated in same [.6].	0.7	\$ 675.00	\$ 472.50		
7/10/2019	TJM	Worked on stipulation to lift stay and substitute party for current defendants [.1]; researched and analyzed issues regarding requirements for substitution [.2].	0.3	\$ 675.00	\$ 202.50		
7/11/2019	TJM	Analyzed issues regarding plan for substituting new defendant and addressing class certification definition issues [.2].	0.2	\$ 675.00	\$ 135.00		
7/12/2019	TJM	Analyzed issues regarding substitution of new entity in place of defendants [.1].	0.1	\$ 675.00	\$ 67.50		
7/16/2019	TJM	Reviewed history of discovery requests and damages calculations and worked on request for supplementation and additional discovery requests [.6]; worked on case strategy issues [.1].	0.7	\$ 675.00	\$ 472.50		
7/17/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
7/18/2019	TJM	Worked on motion to define class and researched and analyzed issues regarding same [2.1].	2.1	\$ 675.00	\$ 1,417.50		
7/19/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
7/22/2019	TJM	Worked on issues regarding joint status report [.1]; email correspondence with co-counsel and opposing counsel regarding same [.1].	0.2	\$ 675.00	\$ 135.00		
7/23/2019	TJM	Worked on strategy for resolving case [.1].	0.1	\$ 675.00	\$ 67.50		
7/24/2019	TJM	Worked on strategy for resolving claims and proposed case schedule [.5]; telephone conference with co-counsel regarding same [.4]; telephone conference with opposing counsel regarding joint status report, case scheduling, and discovery dispute [.7]; worked on motion to require defendants to answer interrogatories [1.3].	2.9	\$ 675.00	\$ 1,957.50		
7/25/2019	HMR	Worked on joint status report.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
7/25/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
7/25/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
7/25/2019	TJM	Worked on joint status report [.8].	0.8	\$ 675.00	\$ 540.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/26/2019	TJM	Worked on joint status report [.3]; researched and analyzed issues regarding Xerox's dispute resolution plan [.3].	0.6	\$ 675.00	\$ 405.00		
7/30/2019	TJM	Researched and analyzed issues regarding defendants' new arguments of claim-splitting and arbitration [1.1].	1.1	\$ 675.00	\$ 742.50		
7/31/2019	TJM	Analyzed issues regarding defendants' new arguments on arbitration [.1].	0.1	\$ 675.00	\$ 67.50		
8/6/2019	TJM	Reviewed defendants' response to motion to determine number of interrogatories and worked on outline of plan for replying to same [.5]; reviewed defendants' response to motion to determine scope of class definition and researched and analyzed issues regarding same [.9]; telephone conference with co-counsel regarding defendants' responses to motions on interrogatories and scope of class definition [.4].	1.8	\$ 675.00	\$ 1,215.00		
8/7/2019	TJM	Researched and analyzed issues regarding DRP and class certification [1.3]; telephone conference with co-counsel regarding same [.4]; analyzed issues regarding class list [.1].	1.8	\$ 675.00	\$ 1,215.00		
8/8/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
8/8/2019	TJM	Researched and analyzed issues regarding withdrawal of motion on scope of class definition [.3]; drafted notice of withdrawal of motion on scope of class definition [.2]; worked on reply in support of motion to determine number of interrogatories [.5]. .	1.0	\$ 675.00	\$ 675.00		
8/9/2019	TJM	Worked on reply in support of motion to determine number of interrogatories [.5].	0.5	\$ 675.00	\$ 337.50		
8/12/2019	TJM	Reviewed defendants' notice of intent to file sur-reply and sur-reply and analyzed issues regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
8/13/2019	JAL	Worked on docketing [0.2].	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
8/13/2019	TJM	Reviewed order on scope of class and analyzed issues regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
8/13/2019	TJM	Reviewed order certifying class and denying leave for more interrogatories and analyzed issues regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
8/14/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/14/2019	TJM	Reviewed corrected order on scope of class and compared same with original order [.1].	0.1	\$ 675.00	\$ 67.50		
8/28/2019	TJM	Analyzed issues regarding class list and outstanding discovery [.3]; telephone conference with co-counsel regarding same [.5]; email correspondence with opposing counsel regarding request to meet and confer [.1].	0.9	\$ 675.00	\$ 607.50		
8/29/2019	JJB	Personal conference regarding defendant's production; worked on restoring case production documents from archive.	0.2	\$ 250.00	\$ 50.00		
8/29/2019	TJM	Worked on damages analyses and researched and analyzed issues regarding same [1.7].	1.7	\$ 675.00	\$ 1,147.50		
8/30/2019	TJM	Reviewed document production and worked on damages modeling [3.2].	3.2	\$ 675.00	\$ 2,160.00		
9/3/2019	TJM	Prepared for telephone conference with co-counsel regarding case strategy and outstanding discovery issues [.2]; participated in same [.5]; reviewed defendants' objections to third set of discovery and plaintiff's supplementation requests and prepared for meet and confer with opposing counsel regarding same [1.0].	1.7	\$ 675.00	\$ 1,147.50		
9/4/2019	TJM	Email correspondence with client regarding status of lawsuit [.1]; telephone conference with co-counsel and opposing counsel regarding class list and various discovery issues [1.0].	1.1	\$ 675.00	\$ 742.50		
9/9/2019	ELN	Analyzed docket and relevant filings, and worked on proposed notice regarding certification [3.8].	3.8	\$ 500.00	\$ 1,900.00		
9/12/2019	TJM	Worked on draft of class notice [.8]; reviewed declaration from defendants' regarding DRP application in Washington and analyzed issues regarding same [.2]; worked on discovery issues [.2]; drafted emails to co-counsel and opposing counsel regarding same and proposed class notice [.3].	1.5	\$ 675.00	\$ 1,012.50		
9/13/2019	TJM	Worked on class notice [.4]; worked on discovery issues and email to opposing counsel regarding same [.4].	0.8	\$ 675.00	\$ 540.00		
9/17/2019	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/17/2019	TJM	Email correspondence with co-counsel regarding appearance at status conference [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/18/2019	TJM	Analyzed issues regarding class list, FEPS data, and termination of ABC plans [.2].	0.2	\$ 675.00	\$ 135.00		
9/19/2019	TJM	Email correspondence with client regarding status of lawsuit and next steps [.1].	0.1	\$ 675.00	\$ 67.50		
9/27/2019	JAL	Worked on docketing [1.1].	1.1	\$ 150.00	\$ 165.00	\$ 165.00	1.1
10/10/2019	TJM	Worked on issues form [.4]; analyzed issues regarding class list [.1]; analyzed issues regarding case schedule [.1]; analyzed issues regarding arbitration defense [.2].	0.8	\$ 675.00	\$ 540.00		
10/11/2019	TJM	Telephone conference with co-counsel regarding class notice, damages modeling, and case strategy issues [.5].	0.5	\$ 675.00	\$ 337.50		
10/14/2019	TJM	Worked on revisions to long-form class notice [.1]; reviewed bids from proposed notice administrators [.1]; analyzed issues regarding outstanding data and other information and email correspondence with opposing counsel regarding same [.1].	0.3	\$ 675.00	\$ 202.50		
10/17/2019	RL	Calls with class members.	0.4	\$ 150.00	\$ 60.00	\$ 60.00	0.4
10/24/2019	TJM	Reviewed declaration of Ms. Lynch and analyzed issues regarding same [.1]; researched and analyzed issues regarding class list [.6]; researched and analyzed issues regarding class certification notice plan and worked on same [.3].	1.0	\$ 675.00	\$ 675.00		
10/28/2019	TJM	Worked on joint motion for approval of notice plan [.2].	0.2	\$ 675.00	\$ 135.00		
11/1/2019	TJM	Analyzed and worked on issues regarding formulation of class list and proposed notice plan [.8]; drafted email to opposing counsel regarding same [.3].	1.1	\$ 675.00	\$ 742.50		
11/6/2019	JJB	Processed and reviewed data.	2.1	\$ 250.00	\$ 525.00		
11/6/2019	TJM	Analyzed issues regarding FEPS data [.8]; telephone conference with co-counsel regarding same and issues with class list and notice plan [.2].	1.0	\$ 675.00	\$ 675.00		
11/7/2019	TJM	Analyzed issues regarding notice plan [.1].	0.1	\$ 675.00	\$ 67.50		
11/13/2019	TJM	Analyzed issues regarding joint notice plan and anticipated defenses regarding arbitration [.2]; worked on declaration of Mr. Johnson in support of joint notice plan [.2].	0.4	\$ 675.00	\$ 270.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/6/2019	TJM	Analyzed issues regarding status of ruling on class notice stipulation and defendants' production of FEPS data [.1].	0.1	\$ 675.00	\$ 67.50		
12/9/2019	JJB	Reviewed production correspondence from opposing counsel; logged into defendant's FTP site.	0.3	\$ 250.00	\$ 75.00		
12/9/2019	TJM	Analyzed issues regarding FEPS data production [.1].	0.1	\$ 675.00	\$ 67.50		
12/10/2019	TJM	Analyzed issues regarding FEPS data and damages modeling [.2].	0.2	\$ 675.00	\$ 135.00		
12/11/2019	JJB	Reviewed and analyzed class data; drafted summary of same; personal conference and correspondence regarding same; revised damages formulas.	3.4	\$ 250.00	\$ 850.00		
12/11/2019	TJM	Worked on damages modeling [1.9]; telephone conferences with co-counsel and Dr. Munson regarding same [.6].	2.5	\$ 675.00	\$ 1,687.50		
12/12/2019	JJB	Personal conference regarding data analysis.	0.5	\$ 250.00	\$ 125.00		
12/12/2019	JJB	Worked on data analysis.	2.6	\$ 250.00	\$ 650.00		
12/12/2019	TJM	Worked on damages modeling [1.0].	1.0	\$ 675.00	\$ 675.00		
12/13/2019	JJB	Worked on data analysis.	0.6	\$ 250.00	\$ 150.00		
12/15/2019	TJM	Worked on damages modeling [3.8].	3.8	\$ 675.00	\$ 2,565.00		
12/16/2019	TJM	Worked on damages modeling [2.0]; telephone conference with co-counsel regarding same [.5]; email correspondence with co-counsel regarding plan for obtaining summary judgment [.1].	2.6	\$ 675.00	\$ 1,755.00		
12/17/2019	TJM	Email correspondence with Dr. Munson regarding damages modeling [.3]; email correspondence with opposing counsel regarding damages modeling [.2]; analyzed issues regarding damages modeling [.3].	0.8	\$ 675.00	\$ 540.00		
12/18/2019	JAL	Worked on docketing [0.3].	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
12/18/2019	JJB	Filed and logged defendant's production.	0.1	\$ 250.00	\$ 25.00		
12/18/2019	TJM	Analyzed issues regarding notice plan [.5]; worked on damages modeling issues and email correspondence with opposing counsel regarding same [1.0]; emails to Dr. Munson regarding revisions to damages formulas [.4].	1.9	\$ 675.00	\$ 1,282.50		
12/19/2019	TJM	Analyzed issues regarding requirements for issuing notice of certification to class members and email to opposing counsel regarding availability of phone numbers and email addresses [.3].	0.3	\$ 675.00	\$ 202.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/20/2019	TJM	Telephone call from Dr. Munson regarding damages modeling [.1].	0.1	\$ 675.00	\$ 67.50		
12/23/2019	JJB	Prepared files to send to expert; sent files to expert.	0.2	\$ 250.00	\$ 50.00		
12/23/2019	TJM	Telephone conference with Dr. Munson regarding damages modeling [.2]; worked on issues regarding same [.1].	0.3	\$ 675.00	\$ 202.50		
1/2/2020	TJM	Analyzed issues regarding request to Xerox for email addresses to provide supplemental certification notice [.2]; analyzed issues regarding revisions to notice website and email correspondence with notice administrator regarding same [.2]; worked on damages modeling [.2]; telephone conference with Dr. Munson regarding same [.9]; email to client regarding issuance of certification notice [.1]; worked on revisions to exclusion request form and email correspondence with opposing counsel regarding same [.3].	1.9	\$ 675.00	\$ 1,282.50		
1/4/2020	TJM	Researched and analyzed issues regarding local rule precluding the filing of contemporaneous dispositive motions [.4]; email correspondence with client regarding plans for establishing liability and damages [.1].	0.5	\$ 675.00	\$ 337.50		
1/8/2020	TJM	Worked on damages modeling [.4]; telephone conference with Dr. Munson regarding same [1.2]; researched and analyzed issues regarding summary judgment on liability and damages [.8].	2.4	\$ 675.00	\$ 1,620.00		
1/9/2020	TJM	Worked on damages modeling [2.4]; telephone conference with Dr. Munson regarding same [.6]; researched and analyzed issues regarding strategy for summary judgment on liability and damages [.3]; worked on expert report of Dr. Munson [.5].	3.8	\$ 675.00	\$ 2,565.00		
1/10/2020	TJM	Worked on expert report of Dr. Munson [.8]; worked on damages modeling issues [.7]; telephone conference with co-counsel regarding same and strategy for summary judgment [.9].	2.4	\$ 675.00	\$ 1,620.00		
1/11/2020	TJM	Worked on damages modeling and expert report of Dr. Munson [6.2].	6.2	\$ 675.00	\$ 4,185.00		
1/12/2020	TJM	Worked on damages modeling and expert report of Dr. Munson [1.9].	1.9	\$ 675.00	\$ 1,282.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/13/2020	RL	Responded to class member inquiries [.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
1/13/2020	TJM	Worked on expert report of Dr. Munson [.4]; worked on damages modeling issues [.4].	0.8	\$ 675.00	\$ 540.00		
1/14/2020	JN	Responded to class member inquiries.	0.3	\$ 250.00	\$ 75.00		
1/14/2020	TJM	Telephone conference with co-counsel and Dr. Munson regarding damages modeling and expert report [1.5]; worked on responding to inquiries from class members [.1].	1.6	\$ 675.00	\$ 1,080.00		
1/15/2020	JJB	Filed expert documents.	0.1	\$ 250.00	\$ 25.00		
1/15/2020	JN	Responded to class member inquiries.	0.5	\$ 250.00	\$ 125.00		
1/15/2020	TJM	Worked on damages modeling [.2]; worked on expert report [.5].	0.7	\$ 675.00	\$ 472.50		
1/16/2020	TJM	Worked on damages modeling issues [.3]; telephone conference with Dr. Munson regarding same [.4].	0.7	\$ 675.00	\$ 472.50		
1/17/2020	JJB	Filed expert data; correspondence regarding same.	0.1	\$ 250.00	\$ 25.00		
1/17/2020	TJM	Email correspondence with Dr. Munson regarding code for damages modeling [.1]; worked on finalizing expert report for production [.2].	0.3	\$ 675.00	\$ 202.50		
1/21/2020	JJB	Processed expert exhibits to report; worked on finalizing same; transmitted exhibits to all counsel.	0.9	\$ 250.00	\$ 225.00		
1/21/2020	TJM	Worked on finalizing expert report of Dr. Munson and related materials for service [.6]; analyzed issues regarding undeliverable notices to class members and email correspondence with notice administrator regarding same [.1]; reviewed report of Xerox's expert and analyzed issues regarding same [.2].	0.9	\$ 675.00	\$ 607.50		
1/22/2020	TJM	Analyzed issues regarding notice and skip tracing [.1].	0.1	\$ 675.00	\$ 67.50		
1/23/2020	TJM	Analyzed issues regarding notice and skip tracing [.1].	0.1	\$ 675.00	\$ 67.50		
1/24/2020	RL	Responded to class member inquiries.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
1/24/2020	TJM	Analyzed issues regarding location of workers who have unpaid hours in damages model [1.0].	1.0	\$ 675.00	\$ 675.00		
1/27/2020	JN	Responded to class member inquiries.	0.1	\$ 250.00	\$ 25.00		
1/28/2020	RL	Responded to class member inquiries.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
1/28/2020	TJM	Telephone conference with Dr. Munson regarding proposed revision to damages modeling [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
1/30/2020	TJM	Analyzed issues regarding disclosure of SSNs for skip tracking [.1].	0.1	\$ 675.00	\$ 67.50		
2/6/2020	TJM	Telephone conferences with Dr. Munson regarding revisions to damages model [.3]; worked on damages modeling issues [1.3]; worked on amended report of Dr. Munson [.5].	2.1	\$ 675.00	\$ 1,417.50		
2/7/2020	TJM	Analyzed issues regarding discovery deadlines and case strategy and email to co-counsel regarding same [.4]; analyzed issues regarding amended report of Dr. Munson [.1]; telephone call from Dr. Munson regarding same [.1].	0.6	\$ 675.00	\$ 405.00		
2/10/2020	TJM	Worked on damages modeling and amended expert report of Dr. Munson [1.3]; telephone conference with Dr. Munson regarding same [.6].	1.9	\$ 675.00	\$ 1,282.50		
2/11/2020	JN	Responded to class member inquiries.	0.1	\$ 250.00	\$ 25.00		
2/12/2020	JN	Responded to class member inquiries and email with notice administrator.	0.5	\$ 250.00	\$ 125.00		
2/12/2020	TJM	Telephone conference with Dr. Munson regarding amended report [.1]; analyzed issues regarding same [.1]; analyzed issues regarding strategy for obtaining a willfulness finding [.4].	0.6	\$ 675.00	\$ 405.00		
2/13/2020	JJB	Prepared exhibits to expert report; finalized expert report; transmitted exhibits to expert report to all counsel.	0.3	\$ 250.00	\$ 75.00		
2/13/2020	TJM	Worked on amended report of Dr. Munson [.3]; analyzed issues regarding damages modeling [.6]; telephone conference and email correspondence with Dr. Munson regarding same [.2]; email correspondence with opposing counsel regarding Dr. Munson's amended report [.1]; analyzed issues regarding necessity of additional discovery in advance of deadlines [.1].	1.3	\$ 675.00	\$ 877.50		
2/14/2020	JN	Responded to class member inquiries.	0.3	\$ 250.00	\$ 75.00		
2/14/2020	TJM	Reviewed status update from notice provider and analyzed issues regarding opt-out received and impact on damages modeling [.1]; worked on motion for summary judgment [1.2]; telephone conference with co-counsel regarding same and case strategy issues [.8]; analyzed issues regarding inquiry on class member status [.1].	2.2	\$ 675.00	\$ 1,485.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/18/2020	JN	Responded to class member inquiries.	0.1	\$ 250.00	\$ 25.00		
2/18/2020	TJM	Analyzed issues regarding proposed discovery requests to defendants [.2].	0.2	\$ 675.00	\$ 135.00		
2/19/2020	JN	Responded to class member inquiries.	0.2	\$ 250.00	\$ 50.00		
2/19/2020	TJM	Analyzed issues regarding potential discovery requests [.8]; analyzed issues regarding opt-out deadline and email correspondence with notice administrator regarding exclusion requests [.1]; worked on motion for summary judgment [.1].	1.0	\$ 675.00	\$ 675.00		
2/20/2020	TJM	Worked on motion for summary judgment [1.2].	1.2	\$ 675.00	\$ 810.00		
2/21/2020	HMR	Worked on and finalized plaintiff's fourth set of interrogatories and requests for production of documents; emailed same to counsel for all parties; coordinated with ABC Legal for delivery of same; emailed same to docketing and filing.	0.6	\$ 200.00	\$ 120.00	\$ 120.00	0.6
2/21/2020	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
2/21/2020	JN	Reviewed defendant's first set of requests for admissions and requested docketing of deadline for same.[.1]	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
2/21/2020	TJM	Worked on plaintiff's fourth set of discovery requests to defendants [.4]; worked on motion for summary judgment [.2]; analyzed issues regarding defendants' requests for admission [.3].	0.9	\$ 675.00	\$ 607.50		
2/23/2020	TJM	Email correspondence with client regarding status update [.1]; analyzed issues regarding defendants' requests for admission and plan for responding to same [.1].	0.2	\$ 675.00	\$ 135.00		
2/24/2020	TJM	Analyzed issues regarding motion for summary judgment [.3]; reviewed Dr. Boedeker's rebuttal report and analyzed issues regarding same and proposed amendments to Dr. Munson's report [1.8]; reviewed requests for admission and 2002 DRP agreements and researched and analyzed issues regarding same [.4].	2.5	\$ 675.00	\$ 1,687.50		
2/25/2020	JN	Retrieved production documents from FTP server and updated production log.	0.2	\$ 250.00	\$ 50.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/25/2020	TJM	Researched and analyzed issues regarding enforcement of arbitration agreements signed by absent class members [.8]; analyzed issues regarding expert rebuttal report and need to revise damages modeling to address issues raised in same [.2].	1.0	\$ 675.00	\$ 675.00		
2/26/2020	TJM	Worked on damages modeling issues [.3]; telephone conference with co-counsel regarding Dr. Boedeker's rebuttal report, amendments to Dr. Munson's report, plan for responding to requests for admission, and plan for responding to efforts to compel arbitration with class members [.8].	1.1	\$ 675.00	\$ 742.50		
2/27/2020	TJM	Reviewed Dr. Boedeker's rebuttal report, worked on damages modeling issues, and drafted memorandum to Dr. Munson regarding same [1.4]; telephone conference with Dr. Munson and co-counsel regarding same [1.0].	2.4	\$ 675.00	\$ 1,620.00		
3/1/2020	TJM	Reviewed draft declaration of notice administrator and analyzed issues regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
3/2/2020	TJM	Email correspondence with client regarding status of case [.1]; researched and analyzed issues regarding plan for responding to requests for admission aimed at alleged arbitration agreements with absent class members [.1].	0.2	\$ 675.00	\$ 135.00		
3/3/2020	TJM	Telephone conference with Dr. Munson regarding damages modeling [.1].	0.1	\$ 675.00	\$ 67.50		
3/4/2020	HMR	Worked on and finalized declaration of Jennifer M. Keough regarding notice and exhibit a; electronically filed same.	0.5	\$ 200.00	\$ 100.00	\$ 100.00	0.5
3/4/2020	TJM	Worked on filing of notice administrator declaration [.1]; analyzed issues regarding opposing counsel's inquiry about class member who settled claims [.1].	0.2	\$ 675.00	\$ 135.00		
3/6/2020	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
3/6/2020	TJM	Analyzed issues regarding timing of summary judgment motion [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/9/2020	TJM	Reviewed defendants' motion to compel arbitration and researched and analyzed issues regarding same [1.0]; telephone conference with co-counsel regarding same and damages modeling revisions [.6]; telephone conference with Dr. Munson regarding damages modeling revisions [1.7]; worked on same [.1]; email correspondence with opposing counsel regarding scheduling of expert deposition [.1].	3.5	\$ 675.00	\$ 2,362.50		
3/10/2020	JN	Responded to class member inquiries.	0.4	\$ 250.00	\$ 100.00		
3/10/2020	TJM	Analyzed issues regarding damages modeling and worked on second amended expert report of Dr. Munson [1.0]; email to Dr. Munson and co-counsel regarding same [.1]; analyzed issues regarding logistics for expert deposition [.1]; researched and analyzed issues regarding class membership status of Ms. Panion and email to opposing counsel regarding same [.4].	1.6	\$ 675.00	\$ 1,080.00		
3/11/2020	JJB	Prepared exhibits to second amended expert report; transmitted final exhibits to expert report to all counsel.	0.3	\$ 250.00	\$ 75.00		
3/11/2020	TJM	Analyzed issues regarding expert report and scheduling of expert deposition [.1]; telephone conference with Dr. Munson and email correspondence with co-counsel regarding same [.1]; worked on revisions to Dr. Munson's second amended report [.3]; communications with co-counsel and Dr. Munson regarding same [.5]; drafted email to opposing counsel regarding same [.2]; analyzed issues regarding and worked on plaintiff's motion for summary judgment [.7]; email to opposing counsel regarding scheduling of expert deposition [.1].	2.0	\$ 675.00	\$ 1,350.00		
3/12/2020	JAL	Worked on docketing [0.2].	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
3/12/2020	TJM	Analyzed issues regarding plaintiff's motion for summary judgment and submission of evidence in support of same [.2]; researched and analyzed issues regarding motion to compel arbitration [.2].	0.4	\$ 675.00	\$ 270.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/13/2020	TJM	Email correspondence with client regarding questions about motion for summary judgment and damages [.2]; analyzed issues regarding same [.3]; analyzed issues regarding preparation for Dr. Munson's deposition and communicated with Dr. Munson regarding same [.2]; researched and analyzed issues regarding objections to be made to requests for admission [.8].	1.5	\$ 675.00	\$ 1,012.50		
3/14/2020	TJM	Analyzed issues regarding defendants request for cancellation of Dr. Munson's deposition and email correspondence with co-counsel and opposing counsel regarding same [.2]; researched and analyzed issues regarding discovery to absent class members and worked on responses to requests for admission [1.3].	1.5	\$ 675.00	\$ 1,012.50		
3/15/2020	TJM	Researched and analyzed issues regarding objections to requests for admission and worked on responses to defendants' first requests for admission [2.3].	2.3	\$ 675.00	\$ 1,552.50		
3/16/2020	TJM	Analyzed issues regarding rescheduling of Dr. Munson's deposition, re-noting of motion to compel arbitration, and briefing schedule on cross-motions for summary judgment [.4]; email correspondence with co-counsel and opposing counsel regarding scheduling of call to discuss various issues [.1]; telephone conference with co-counsel regarding various case strategy issues [.4]; worked on objections and responses to requests for admission [.5]; researched and analyzed issues regarding ability to conduct deposition via video conferencing [.2]; prepared for conference call with opposing counsel regarding briefing and deposition scheduling issues [.2]; participated in same [.7]; telephone conference with co-counsel regarding same [.2]; communicated with Dr. Munson regarding scheduling of deposition [.1]; analyzed issues regarding Dr. Munson's amended report in preparation for deposition [.2].	3.0	\$ 675.00	\$ 2,025.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/17/2020	TJM	Analyzed issues regarding deposition and briefing scheduling [.2]; reviewed settlement agreement between Defendants and Ms. Richard [.1]; drafted email to opposing counsel regarding proposals for scheduling of deposition of Dr. Munson, scheduling of motions, and handling of Ms. Richard's status as class member [.2]; worked on rescheduling deposition and communicated with Dr. Munson regarding same [.1].	0.6	\$ 675.00	\$ 405.00		
3/20/2020	TJM	Researched and analyzed issues regarding waiver of right to compel arbitration [.3]; worked on revisions to responses to requests for admission and email correspondence with co-counsel regarding same [.3]; analyzed issues regarding stipulation to extend discovery and briefing deadlines [.1].	0.7	\$ 675.00	\$ 472.50		
3/21/2020	TJM	Worked on finalizing responses to requests for admission [.1]; researched and analyzed issues regarding signature requirement for same [.1].	0.2	\$ 675.00	\$ 135.00		
3/22/2020	TJM	Email to opposing counsel regarding request for e-service agreement in light of COVID-19 outbreak [.1].	0.1	\$ 675.00	\$ 67.50		
3/23/2020	TJM	Email correspondence with opposing counsel regarding e-service agreement [.1]; made final edits to responses to requests for admission and served same [.3].	0.4	\$ 675.00	\$ 270.00		
3/25/2020	TJM	Email correspondence with Mr. Cote and Mr. MacLeod regarding notices of withdrawal [.1].	0.1	\$ 675.00	\$ 67.50		
3/26/2020	JN	Worked on expert deposition issues.[.1]; email with Mr. Madden regarding class member. [.1]	0.2	\$ 250.00	\$ 50.00		
3/26/2020	TJM	Email correspondence with opposing counsel regarding technological issues with Dr. Munson's deposition and status of Ms. Panion as class member [.2]; worked on preparations for Dr. Munson's deposition [.4]; telephone conference and email correspondence with Dr. Munson regarding same [.3]; analyzed issues regarding Ms. Panion and potential exclusion of other class members [.2]; analyzed issues regarding technological setup necessary for Dr. Munson's deposition [.3].	1.4	\$ 675.00	\$ 945.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/27/2020	JAL	Worked on docketing [0.2].	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
3/27/2020	JAL	Worked on docketing [0.5].	0.5	\$ 150.00	\$ 75.00	\$ 75.00	0.5
3/27/2020	JJB	Prepared documents for expert deposition.	0.6	\$ 250.00	\$ 150.00		
3/27/2020	TJM	Prepared for deposition of Dr. Munson [.1].	0.1	\$ 675.00	\$ 67.50		
3/29/2020	TJM	Reviewed expert materials and worked on outline of points to cover with Dr. Munson in preparation for deposition [2.1].	2.1	\$ 675.00	\$ 1,417.50		
3/30/2020	TJM	Telephone conference with Dr. Munson regarding preparation for deposition [2.9]; worked on issues related to same [.4].	3.3	\$ 675.00	\$ 2,227.50		
3/31/2020	TJM	Prepared for deposition of Dr. Munson [.3]; participated in same [7.3]; telephone conference with Dr. Munson regarding same [.4].	8.0	\$ 675.00	\$ 5,400.00		
4/1/2020	TJM	Analyzed issues that came up in Dr. Munson's deposition and worked on strategy for handling same [.5]; email correspondence with client regarding status of case [.1].	0.6	\$ 675.00	\$ 405.00		
4/2/2020	JN	Responded to class member inquiries.	0.2	\$ 250.00	\$ 50.00		
4/2/2020	TJM	Worked on response to motion to compel arbitration and researched and analyzed issues regarding same [1.6].	1.6	\$ 675.00	\$ 1,080.00		
4/3/2020	TJM	Worked on response to defendants' motion to compel arbitration under 2002 DRP and researched and analyzed issues regarding same [1.8].	1.8	\$ 675.00	\$ 1,215.00		
4/4/2020	TJM	Worked on response to defendants' motion to compel arbitration under 2002 DRP and researched and analyzed issues regarding same [2.8].	2.8	\$ 675.00	\$ 1,890.00		
4/5/2020	TJM	Worked on response to defendants' motion to compel arbitration under 2002 DRP and researched and analyzed issues regarding same [2.7]; worked on analysis of issues referenced in Dr. Munson's deposition and drafted memorandum regarding same [1.8].	4.5	\$ 675.00	\$ 3,037.50		
4/6/2020	JN	Worked on class list issues.	0.1	\$ 250.00	\$ 25.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/6/2020	TJM	Worked on analysis of data issues raised in Dr. Munson's deposition [.3]; worked on response to motion to compel arbitration [.1]; email correspondence with opposing counsel regarding data for Ms. Panion and invoice for deposition of expert [.1].	0.5	\$ 675.00	\$ 337.50		
4/8/2020	TJM	Analyzed issues regarding scope of class [.1]; worked on response to motion to compel arbitration [1.5].	1.6	\$ 675.00	\$ 1,080.00		
4/9/2020	TJM	Reviewed supplemental expert report of Dr. Boedeker and analyzed issues regarding same [.2]; analyzed issues regarding notice administration expenses [.1].	0.3	\$ 675.00	\$ 202.50		
4/10/2020	TJM	Analyzed issues regarding defendants' supplement expert report [.2].	0.2	\$ 675.00	\$ 135.00		
4/13/2020	TJM	Worked on action items related to transcript of deposition of Dr. Munson [.1]; worked on case management issues [.1].	0.2	\$ 675.00	\$ 135.00		
4/14/2020	JJB	Transmitted deposition transcript and exhibits to co-counsel; correspondence regarding witness review of deposition testimony.	0.1	\$ 250.00	\$ 25.00		
4/14/2020	TJM	Reviewed defendants' response to plaintiff's motion for summary judgment and defendants' cross-motion for summary judgment and analyzed issues regarding same [4.2].	4.2	\$ 675.00	\$ 2,835.00		
4/15/2020	TJM	Reviewed defendants' response to plaintiff's motion for summary judgment and defendants' cross-motion for summary judgment and analyzed issues regarding same [1.5]; telephone conference with co-counsel regarding same and plan for responding [.9]; worked on res judicata research [.3].	2.7	\$ 675.00	\$ 1,822.50		
4/19/2020	TJM	Reviewed defendants' reply in support of motion to compel arbitration and analyzed issues regarding same [.7].	0.7	\$ 675.00	\$ 472.50		
4/20/2020	TJM	Analyzed issues regarding arguments raised in defendants' reply in support of motion to compel arbitration [.1].	0.1	\$ 675.00	\$ 67.50		
4/21/2020	TJM	Worked on outline of response to defendants' motion for summary judgment and researched and analyzed issues regarding same [3.2].	3.2	\$ 675.00	\$ 2,160.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/22/2020	TJM	Worked on outline of response to defendants' motion for summary judgment and researched and analyzed issues regarding same [5.0].	5.0	\$ 675.00	\$ 3,375.00		
4/23/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [3.3].	3.3	\$ 675.00	\$ 2,227.50		
4/24/2020	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
4/24/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [3.4].	3.4	\$ 675.00	\$ 2,295.00		
4/25/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [6.6].	6.6	\$ 675.00	\$ 4,455.00		
4/26/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [8.4].	8.4	\$ 675.00	\$ 5,670.00		
4/27/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [6.2].	6.2	\$ 675.00	\$ 4,185.00		
4/28/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [9.2].	9.2	\$ 675.00	\$ 6,210.00		
4/29/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [7.7].	7.7	\$ 675.00	\$ 5,197.50		
4/30/2020	TJM	Worked on response to cross-motion for summary judgment and researched and analyzed issues regarding same [8.6]; telephone conference with co-counsel regarding same [.5].	9.1	\$ 675.00	\$ 6,142.50		
5/1/2020	TJM	Worked on response to cross-motion for summary judgment and declaration in support of same [2.7].	2.7	\$ 675.00	\$ 1,822.50		
5/4/2020	TJM	Reviewed motion for decertification and researched and analyzed issues regarding plan for responding to same [2.0].	2.0	\$ 675.00	\$ 1,350.00		
5/5/2020	JN	Email to Mr. Johnson enclosing ShareFile link to Mr. Munson's deposition transcript.[.1]	0.1	\$ 250.00	\$ 25.00		
5/5/2020	TJM	Reviewed transcript from deposition of Dr. Munson [1.1].	1.1	\$ 675.00	\$ 742.50		
5/6/2020	TJM	Continued reviewing transcript of deposition of Dr. Munson [.6].	0.6	\$ 675.00	\$ 405.00		
5/7/2020	TJM	Reviewed transcript of deposition of Dr. Munson and worked on errata sheet for same [2.0].	2.0	\$ 675.00	\$ 1,350.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/8/2020	TJM	Finalized review of transcript from deposition of Dr. Munson and worked on correction sheet [.7]; email correspondence with Dr. Munson regarding same [.1]; analyzed issues regarding response to decertification motion [.1].	0.9	\$ 675.00	\$ 607.50		
5/9/2020	TJM	Reviewed defendants' reply in support of motion for summary judgment [.6].	0.6	\$ 675.00	\$ 405.00		
5/10/2020	TJM	Worked on response to motion to decertify and researched and analyzed issues regarding same [4.2].	4.2	\$ 675.00	\$ 2,835.00		
5/11/2020	TJM	Worked on response to motion to decertify class and researched and analyzed issues regarding same [1.3]; telephone conference with co-counsel regarding same [.7]; telephone conferences with Dr. Munson regarding errata sheet [.4]; email correspondence with court reporter regarding same [.1].	2.5	\$ 675.00	\$ 1,687.50		
5/12/2020	TJM	Worked on case management issues [.2].	0.2	\$ 675.00	\$ 135.00		
5/19/2020	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
5/20/2020	TJM	Analyzed issues regarding status of defendants' response to request for FEPS data for Ms. Panion, methodology for determining class status, and payment to Dr. Munson; email correspondence with opposing counsel regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
5/22/2020	TJM	Analyzed issues regarding defendants' response to request for additional information on Ms. Panion and payment for Dr. Munson and email to Dr. Munson regarding W-9 [.2].	0.2	\$ 675.00	\$ 135.00		
5/25/2020	TJM	Reviewed defendants' reply in support of decertification motion and analyzed issues regarding same [.3]; researched and analyzed issues regarding defendants' methodology for determining class member status [.3].	0.6	\$ 675.00	\$ 405.00		
5/26/2020	JJB	Worked on data analysis.	0.7	\$ 250.00	\$ 175.00		
5/26/2020	TJM	Analyzed issues regarding defendants methodology for inclusion in class [.2].	0.2	\$ 675.00	\$ 135.00		
5/27/2020	TJM	Worked on analysis of class members potentially excluded from notice program [.2]; email correspondence with Dr. Munson and opposing counsel regarding W-9 for deposition payment [.1].	0.3	\$ 675.00	\$ 202.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
6/11/2020	JJB	Worked on data analysis.	1.2	\$ 250.00	\$ 300.00		
7/30/2020	TJM	Analyzed issues regarding proposal to extend pretrial deadlines [.1]; email correspondence with client regarding status of pending motions and trial date [.2].	0.3	\$ 675.00	\$ 202.50		
8/7/2020	TJM	Analyzed issues regarding draft of joint request to stay case schedule [.1].	0.1	\$ 675.00	\$ 67.50		
8/20/2020	JAL	Worked on docketing [0.1].	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
8/20/2020	TJM	Reviewed order striking trial date and pretrial deadlines and analyzed issues regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
8/28/2020	TJM	Reviewed order on motions for decertification and to compel arbitration and analyzed issues regarding same [.5]; email correspondence with client regarding same [.1]; email correspondence with co-counsel regarding same [.1].	0.7	\$ 675.00	\$ 472.50		
9/28/2020	DL	Worked on docketing [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
9/28/2020	DL	Worked on docketing [1]	1.0	\$ 150.00	\$ 150.00	\$ 150.00	1.0
9/28/2020	TJM	Analyzed issues regarding defendants' request for stay pending appeal from order denying motion to compel arbitration [.1]; telephone conference with co-counsel regarding same and adjustment to damages figure [.5]; worked on revised damages figure [.1]; worked on removal of Amedee plaintiffs from damages calculations and explanation of process for same [.9]; worked on declaration of Mr. Johnson regarding amended damages figure [.1].	1.7	\$ 675.00	\$ 1,147.50		
9/29/2020	DL	Worked on docketing [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
9/29/2020	DL	Worked on docketing [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
10/2/2020	TJM	Worked on plans for completing Ninth Circuit mediation questionnaire and response to motion to stay [.1].	0.1	\$ 675.00	\$ 67.50		
10/5/2020	DL	Worked on docketing [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
10/5/2020	TJM	Reviewed motion to stay proceedings and analyzed issues regarding strategy for responding to same [.5].	0.5	\$ 675.00	\$ 337.50		
10/9/2020	TJM	Worked on response to motion for stay pending appeal from order denying arbitration [1.5].	1.5	\$ 675.00	\$ 1,012.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/13/2020	DL	Worked on docketing [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
10/13/2020	HMR	Worked on and finalized plaintiff's response to Xerox's motion to stay.	0.5	\$ 200.00	\$ 100.00		
10/13/2020	TJM	Worked on filing of response to motion to stay case pending appeal [.1].	0.1	\$ 675.00	\$ 67.50		
10/15/2020	TJM	Email correspondence with client regarding status of case [.2].	0.2	\$ 675.00	\$ 135.00		
10/16/2020	DL	Worked on docketing [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
10/16/2020	TJM	Reviewed defendants' reply in support of motion to stay proceedings pending appeal from denial of motion to compel arbitration [.2].	0.2	\$ 675.00	\$ 135.00		
10/26/2020	JAL	Worked on docketing [0.2].	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
10/27/2020	DL	Worked on docketing [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
10/27/2020	TJM	Reviewed order setting mediation assessment and analyzed issues regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
11/19/2020	TJM	Prepared for conference call with opposing counsel and Ninth Circuit mediator [.5]; participated in same [.9].	1.4	\$ 675.00	\$ 945.00		
11/23/2020	TJM	Drafted memorandum to co-counsel following up on conference with Ninth Circuit mediator and analyzed issues regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
11/29/2020	TJM	Analyzed issues regarding settlement talks [.1].	0.1	\$ 675.00	\$ 67.50		
12/6/2020	TJM	Worked on calculations for settlement offer and email correspondence with co-counsel regarding same [.4].	0.4	\$ 675.00	\$ 270.00		
12/7/2020	TJM	Worked on settlement offer [.1].	0.1	\$ 675.00	\$ 67.50		
12/14/2020	TJM	Analyzed issues regarding defendants' response to settlement offer and next steps [.1].	0.1	\$ 675.00	\$ 67.50		
12/23/2020	ET	Docketed deadlines [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
1/25/2021	TJM	Analyzed issues regarding notice on JND website regarding status of lawsuit and email correspondence with JND and co-counsel regarding same [.1]; analyzed issues regarding inquiry from class member [.1].	0.2	\$ 675.00	\$ 135.00		
2/3/2021	HK	Responded to class member inquiries.	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/3/2021	TJM	Email correspondence with client regarding status of litigation [.1].	0.1	\$ 675.00	\$ 67.50		
2/4/2021	ET	Docketed deadlines [0.3]	0.3	\$ 150.00	\$ 45.00	\$ 45.00	0.3
2/4/2021	HK	Responded to class member inquiries.	3.1	\$ 150.00	\$ 465.00	\$ 465.00	3.1
2/5/2021	ET	Reviewed incoming documents for docketing [0.1]; Filed documents in ProLaw [0.1]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
2/8/2021	ET	Docketed deadlines and filed documents in ProLaw [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
2/8/2021	TJM	Email correspondence with co-counsel regarding plans for drafting answering brief on appeal from order denying motion to compel arbitration [.1].	0.1	\$ 675.00	\$ 67.50		
2/11/2021	TJM	Reviewed defendants' opening brief on appeal from order denying motion to compel arbitration [1.0]; telephone conference with co-counsel regarding same and strategy for answering brief [.7]; researched and analyzed cases in which district courts certified classes that carved out people who signed arbitration agreements [.9].	2.6	\$ 675.00	\$ 1,755.00		
2/12/2021	JM	Research issues for answering brief on appeal [1.4].	1.4	\$ 150.00	\$ 210.00	\$ 210.00	1.4
2/16/2021	JM	Researched issues for answering brief on appeal [1.]	1.0	\$ 150.00	\$ 150.00	\$ 150.00	1.0
2/17/2021	TJM	Researched and analyzed issues raised by defendants' on appeal and email correspondence with co-counsel regarding plan for responding to same [.8].	0.8	\$ 675.00	\$ 540.00		
2/18/2021	JM	Researched issues raised by Defendants' appeal [1.6].	1.6	\$ 150.00	\$ 240.00	\$ 240.00	1.6
2/19/2021	JM	Researched issues raised by Defendants' appeal [1.7].	1.7	\$ 150.00	\$ 255.00	\$ 255.00	1.7
2/22/2021	TJM	Researched and analyzed issues on appeal and email correspondence with co-counsel regarding results from same [1.0].	1.0	\$ 675.00	\$ 675.00		
2/25/2021	TJM	Researched and analyzed issues regarding deadline for streamlined extension request [.1].	0.1	\$ 675.00	\$ 67.50		
3/2/2021	ET	Docketed deadlines [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
3/5/2021	TJM	Analyzed issues regarding factual background for answering brief on appeal [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/8/2021	TJM	Researched and analyzed issues regarding factual background for answering brief in appeal from order denying motion to compel [.8].	0.8	\$ 675.00	\$ 540.00		
3/9/2021	ET	Fixed docket issue in ProLaw [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
3/28/2021	TJM	Worked on answering brief [2.7].	2.7	\$ 675.00	\$ 1,822.50		
3/30/2021	HMR	Emailed unsealed copies of docket 107, exhibits a-e to co-counsel.	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
4/5/2021	ET	Docketed deadlines [0.2]	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
4/13/2021	ET	Docketed deadlines [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
4/14/2021	ET	Docketed deadlines [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
5/3/2021	ET	Docketed deadlines [0.1]	0.1	\$ 150.00	\$ 15.00	\$ 15.00	0.1
5/11/2021	TJM	Worked on class member information update [.1].	0.1	\$ 675.00	\$ 67.50		
6/1/2021	TJM	Reviewed Defendants' reply in support of appeal from order denying motion to compel arbitration and analyzed issues regarding same [.5]; analyzed issues regarding plan for hearing on appeal [.1]; email correspondence with client regarding status of lawsuit [.1].	0.7	\$ 675.00	\$ 472.50		
6/2/2021	JN	Responded to class member inquiries.	0.4	\$ 250.00	\$ 100.00		
7/29/2021	TJM	Analyzed issues regarding preparations for hearing on appeal [.1].	0.1	\$ 675.00	\$ 67.50		
8/2/2021	TJM	Worked on preparations for moot of argument before Ninth Circuit [.2].	0.2	\$ 675.00	\$ 135.00		
8/3/2021	TJM	Analyzed issues regarding panel assignment for appeal [.1]; worked on preparations for mooting argument [.1]; researched and analyzed decisions by panelists on relevant points and drafted memorandum to co-counsel regarding same [1.1].	1.3	\$ 675.00	\$ 877.50		
8/5/2021	TJM	Researched and analyzed issues regarding arguments to be made on appeal [1.0].	1.0	\$ 675.00	\$ 675.00		
8/10/2021	AMS	Reviewed briefs in preparation for moot court [1.8].	1.8	\$ 650.00	\$ 1,170.00		
8/10/2021	TJM	Reviewed briefs and record excerpts in preparation for moot of Ninth Circuit argument, researched and analyzed issues regarding same, and drafted memorandum to co-counsel regarding same [3.2]; participated in moot of Ninth Circuit argument [1.4].	4.6	\$ 675.00	\$ 3,105.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/11/2021	AMS	Prepared for and participated in moot court [5.5].	5.5	\$ 650.00	\$ 3,575.00		
8/11/2021	TJM	Reviewed recent Bress decision, analyzed issues regarding same, and drafted memorandum to co-counsel regarding potential impact of same on appeal [1.0]; analyzed issues regarding standard of review [.1].	1.1	\$ 675.00	\$ 742.50		
8/12/2021	TJM	Attended argument before Ninth Circuit [.8]; telephone conference with co-counsel regarding same [.2].	1.0	\$ 675.00	\$ 675.00		
8/19/2021	TJM	Email correspondence with client regarding argument before Ninth Circuit and next steps in case [.2].	0.2	\$ 675.00	\$ 135.00		
9/7/2021	TJM	Reviewed order denying Defendants' motion to stay and analyzed issues regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
10/3/2021	TJM	Reviewed motion to stay and worked on plan for responding to same [.3].	0.3	\$ 675.00	\$ 202.50		
10/4/2021	EAA	Reviewed appellate motion to stay and case docket in preparation for drafting response to same.	0.4	\$ 525.00	\$ 210.00		
10/4/2021	TJM	Worked on plan for responding to motion to stay district court proceedings pending outcome of appeal [.1].	0.1	\$ 675.00	\$ 67.50		
10/5/2021	EAA	Worked on drafting response to appellate motion to stay pending appeal.	1.7	\$ 525.00	\$ 892.50		
10/6/2021	EAA	Completed draft of response to appellate motion to stay.	3.7	\$ 525.00	\$ 1,942.50		
10/6/2021	TJM	Worked on answer to motion to stay district court proceedings pending resolution of appeal and analyzed issues regarding same [.9].	0.9	\$ 675.00	\$ 607.50		
10/7/2021	EAA	Reviewed edits to response to appellate motion to stay and revised same [0.4]; email correspondence regarding same [0.1].	0.5	\$ 525.00	\$ 262.50		
10/7/2021	TJM	Worked on answer to motion to stay district court proceedings pending appeal [.2].	0.2	\$ 675.00	\$ 135.00		
10/8/2021	EAA	Reviewed co-counsel's edits to response to appellate motion to stay and email correspondence regarding same.	0.3	\$ 525.00	\$ 157.50		
10/8/2021	TJM	Worked on answer to motion for stay and researched and analyzed issues regarding same [.8].	0.8	\$ 675.00	\$ 540.00		
11/13/2021	TJM	Email correspondence with client regarding status of case [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/15/2021	TJM	Email correspondence with client regarding questions about status of appellate and district court rulings [.1].	0.1	\$ 675.00	\$ 67.50		
11/17/2021	TJM	Reviewed orders staying appeal pending decision in case before Supreme Court [.1].	0.1	\$ 675.00	\$ 67.50		
11/19/2021	TJM	Researched and analyzed issues regarding Morgan v. Sundance and email correspondence with co-counsel and client regarding Ninth Circuit's decision to stay case pending outcome in same [.3].	0.3	\$ 675.00	\$ 202.50		
11/24/2021	JAL	Worked on class member calls [0.5].	0.5	\$ 150.00	\$ 75.00	\$ 75.00	0.5
12/1/2021	TJM	Analyzed issues regarding case pending before United States Supreme Court for which our case was stayed [.1].	0.1	\$ 675.00	\$ 67.50		
12/2/2021	TJM	Researched and analyzed issues regarding interplay between our case and Morgan v. Sundance [.9]; email to Ms. Gilbride regarding same [.2].	1.1	\$ 675.00	\$ 742.50		
1/17/2022	TJM	Reviewed opening brief in Morgan v. Sundance, Inc. and analyzed issues regarding same [.5].	0.5	\$ 675.00	\$ 337.50		
1/31/2022	TJM	Worked on class member tracking issues [.1]; email correspondence with Mr. Turner and co-counsel regarding same [.1].	0.2	\$ 675.00	\$ 135.00		
2/7/2022	TJM	Email correspondence with class member regarding scope of claims [.2].	0.2	\$ 675.00	\$ 135.00		
2/21/2022	TJM	Analyzed issues regarding class member inquiry and worked on updating contact info [.1].	0.1	\$ 675.00	\$ 67.50		
2/22/2022	JAL	Email to notice administrator regarding class member [0.2].	0.2	\$ 150.00	\$ 30.00	\$ 30.00	0.2
4/12/2022	TJM	Email correspondence with Ms. Hill regarding status of appeal [.1].	0.1	\$ 675.00	\$ 67.50		
5/26/2022	TJM	Reviewed decision in Morgan v. Sundance and analyzed issues regarding same [.4].	0.4	\$ 675.00	\$ 270.00		
6/30/2022	TJM	Analyzed issues regarding plan for drafting requested supplemental brief on appeal [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/6/2022	TJM	Reviewed order on supplemental briefing on appeal and researched and analyzed issues regarding same [.6]; telephone conference with co-counsel regarding same and plan for drafting brief [.6].	1.2	\$ 675.00	\$ 810.00		
7/9/2022	TJM	Researched and analyzed issues regarding question raised by Court of Appeals for supplemental briefing [3.6].	3.6	\$ 675.00	\$ 2,430.00		
7/10/2022	TJM	Researched and analyzed issues regarding question raised by Court of Appeals for supplemental briefing [1.0].	1.0	\$ 675.00	\$ 675.00		
7/11/2022	TJM	Worked on supplemental brief regarding Morgan and researched and analyzed issues regarding same [2.8].	2.8	\$ 675.00	\$ 1,890.00		
7/12/2022	TJM	Worked on supplemental brief regarding Morgan and researched and analyzed issues regarding same [9.8].	9.8	\$ 675.00	\$ 6,615.00		
7/13/2022	TJM	Worked on supplemental brief regarding impact of Morgan v. Sundance and researched and analyzed issues regarding same [3.1]; email correspondence with client regarding same [.1].	3.2	\$ 675.00	\$ 2,160.00		
7/14/2022	TJM	Worked on supplemental brief on Morgan and researched and analyzed issues regarding same [.2]; reviewed defendants' supplemental brief on Morgan and analyzed issues regarding same [.2].	0.4	\$ 675.00	\$ 270.00		
7/20/2022	TJM	Email correspondence with client regarding supplemental appellate briefs [.1].	0.1	\$ 675.00	\$ 67.50		
8/5/2022	TJM	Analyzed issues regarding delivery of copies of supplemental brief to Ninth Circuit and email correspondence with court clerk regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
10/21/2022	TJM	Email correspondence with client regarding status of case [.1].	0.1	\$ 675.00	\$ 67.50		
1/9/2023	TJM	Reviewed decisions following Morgan and analyzed issues regarding same [.4].	0.4	\$ 675.00	\$ 270.00		
1/11/2023	TJM	Email correspondence with client regarding status of Ninth Circuit's decision [.1].	0.1	\$ 675.00	\$ 67.50		
2/7/2023	TJM	Reviewed appellate decision and analyzed issues regarding same [.8]; email correspondence with client regarding same [.1].	0.9	\$ 675.00	\$ 607.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/13/2023	TJM	Worked on bill of costs [.1]; analyzed issues regarding settlement and proposal for same [.3].	0.4	\$ 675.00	\$ 270.00		
2/14/2023	TJM	Worked on letter to opposing counsel regarding settlement proposal [.2].	0.2	\$ 675.00	\$ 135.00		
2/16/2023	TJM	Worked on costs bill [.2].	0.2	\$ 675.00	\$ 135.00		
2/17/2023	TJM	Analyzed issues regarding bill of costs and email correspondence with co-counsel regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
2/23/2023	TJM	Reviewed order from Court of Appeals for filing of response to petition for rehearing en banc and worked on plan for responding to same [.1].	0.1	\$ 675.00	\$ 67.50		
3/7/2023	TJM	Email correspondence with class member regarding status of case [.1].	0.1	\$ 675.00	\$ 67.50		
3/14/2023	TJM	Analyzed issues regarding petition for rehearing and response to same [.5].	0.5	\$ 675.00	\$ 337.50		
3/15/2023	TJM	Worked on response to defendant's petition for rehearing en banc [1.1].	1.1	\$ 675.00	\$ 742.50		
4/5/2023	TJM	Reviewed order denying rehearing request and analyzed issues regarding same [.1]; email correspondence with client regarding status of case [.1].	0.2	\$ 675.00	\$ 135.00		
4/11/2023	TJM	Analyzed issues regarding post-appeal events [.1].	0.1	\$ 675.00	\$ 67.50		
4/12/2023	TJM	Telephone conference with co-counsel regarding next steps in litigation after issuance of mandate [.3].	0.3	\$ 675.00	\$ 202.50		
4/23/2023	TJM	Researched and analyzed issues regarding supplemental authority for pending summary judgment motions [.3].	0.3	\$ 675.00	\$ 202.50		
7/13/2023	TJM	Email correspondence with client and co-counsel regarding current status of lawsuit [.1].	0.1	\$ 675.00	\$ 67.50		
8/21/2023	TJM	Researched and analyzed issues regarding class list and overlap with Douglas opt-ins [.4].	0.4	\$ 675.00	\$ 270.00		
2/13/2024	TJM	Reviewed court's order on cross-motions for summary judgment and analyzed issues regarding same [.5].	0.5	\$ 675.00	\$ 337.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/14/2024	TJM	Continued reviewing order on cross-motions for summary judgment, researched and analyzed issues regarding implications of same, and worked on outline of next steps [2.8]; telephone conference with co-counsel regarding same [.6]; email correspondence with client regarding court's order and status of case [.2].	3.6	\$ 675.00	\$ 2,430.00		
2/20/2024	TJM	Researched and analyzed issues to be raised in motion for reconsideration of portions of order on cross-motions for summary judgment [.6]; telephone conference with co-counsel regarding same [1.2].	1.8	\$ 675.00	\$ 1,215.00		
2/21/2024	TJM	Continued researching and analyzing issues for motion seeking reconsideration of holdings in order on cross-motions for summary judgment [6.7].	6.7	\$ 675.00	\$ 4,522.50		
2/22/2024	KB	Drafted shell for motion for partial reconsideration [.3].	0.3	\$ 200.00	\$ 60.00	\$ 60.00	0.3
2/22/2024	TJM	Worked on case management issues [.1]; continued researching and analyzing issues in preparation for reconsideration motion and started drafting same [4.7].	4.8	\$ 675.00	\$ 3,240.00		
2/23/2024	TJM	Worked on motion for reconsideration of order on cross-motions for summary judgment [6.2].	6.2	\$ 675.00	\$ 4,185.00		
2/24/2024	TJM	Worked on motion for reconsideration of order on cross-motions for summary judgment and researched and analyzed issues regarding same [4.3].	4.3	\$ 675.00	\$ 2,902.50		
2/25/2024	TJM	Worked on motion for partial reconsideration of order on cross-motions [2.0].	2.0	\$ 675.00	\$ 1,350.00		
2/26/2024	TJM	Worked on motion for partial reconsideration of order on cross-motions for summary judgment and researched and analyzed issues regarding same [2.8].	2.8	\$ 675.00	\$ 1,890.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/27/2024	HMR	Worked on and finalized plaintiff's motion for partial reconsideration, proposed order, declaration of Toby J. Marshall, plaintiff's motion for relief from deadline, proposed order, plaintiff's motion for leave to file overlength brief, proposed and declaration of Toby J. Marshall; electronically filed same; emailed proposed orders to judge [1.5]	1.5	\$ 200.00	\$ 300.00		
2/27/2024	TJM	Worked on motion for relief from deadline on motion for leave to file overlength brief and proposed order granting same [.4]; worked on motion for leave to file overlength brief and proposed order granting same [.4]; worked on declaration in support of motions for relief from deadline and leave to file overlength brief [.3]; worked on motion for partial reconsideration of order on cross-motions for summary judgment and proposed order granting same [.3]; worked on declaration in support of same [.1].	1.5	\$ 675.00	\$ 1,012.50		
2/28/2024	TJM	Telephone conference with co-counsel regarding case strategy issues in preparation for call with opposing counsel regarding court's request for proposed schedule [.5]; video conference with opposing counsel regarding court's request for proposed schedule [.4]; analyzed issues regarding same [.1].	1.0	\$ 675.00	\$ 675.00		
3/8/2024	TJM	Analyzed issues regarding defendants' lack of response to motion for relief from deadline [.1].	0.1	\$ 675.00	\$ 67.50		
3/11/2024	TJM	Analyzed issues regarding upcoming deadline for joint status report and email correspondence with opposing counsel regarding same [.1]; reviewed defendants' draft joint status report and analyzed issues regarding same [.3]; telephone conference with co-counsel regarding same and case strategy issues [.7]; worked on revisions to draft joint status report [.5].	1.6	\$ 675.00	\$ 1,080.00		
3/12/2024	TJM	Email correspondence with opposing counsel regarding draft joint status report [.1].	0.1	\$ 675.00	\$ 67.50		
3/13/2024	TJM	Worked on joint status report issues [.2].	0.2	\$ 675.00	\$ 135.00		
3/22/2024	TJM	Email correspondence with client regarding status of case and recent filings [.2].	0.2	\$ 675.00	\$ 135.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/28/2024	TJM	Reviewed minute order on motion for reconsideration and analyzed issues regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
3/29/2024	TJM	Email correspondence with client regarding order for briefing on motion for reconsideration [.1].	0.1	\$ 675.00	\$ 67.50		
4/11/2024	TJM	Reviewed defendants' response to motion for reconsideration and researched and analyzed issues and arguments relating to same [1.0].	1.0	\$ 675.00	\$ 675.00		
4/12/2024	TJM	Email correspondence with co-counsel regarding plan for replying to response to motion for reconsideration [.1].	0.1	\$ 675.00	\$ 67.50		
4/15/2024	HMR	Worked on reply in support of plaintiff's motion for reconsideration. [.2]	0.2	\$ 200.00	\$ 40.00		
4/15/2024	TJM	Worked on reply in support of motion for reconsideration and researched and analyzed issues regarding same [4.1].	4.1	\$ 675.00	\$ 2,767.50		
4/16/2024	TJM	Worked on reply in support of motion for reconsideration and researched and analyzed issues regarding same [6.4].	6.4	\$ 675.00	\$ 4,320.00		
4/17/2024	TJM	Email correspondence with co-counsel regarding draft reply in support of motion for reconsideration [.1]; worked on same [1.9].	2.0	\$ 675.00	\$ 1,350.00		
4/18/2024	TJM	Telephone conference with co-counsel regarding reply in support of motion for reconsideration [.2]; worked on same [.2].	0.4	\$ 675.00	\$ 270.00		
4/23/2024	TJM	Reviewed defendants' surreply on motion for reconsideration, researched and analyzed issues regarding same, and drafted email to co-counsel regarding plan for responding to same if given opportunity [.5].	0.5	\$ 675.00	\$ 337.50		
5/15/2024	TJM	Email correspondence with class member regarding status of lawsuit [.1].	0.1	\$ 675.00	\$ 67.50		
6/12/2024	TJM	Analyzed issues regarding court's order on reconsideration [.3]; worked on next steps and researched and analyzed issues regarding same [.6]; telephone conference with co-counsel regarding same [.5]; email to co-counsel regarding same [.1].	1.5	\$ 675.00	\$ 1,012.50		
6/14/2024	JJB	Collected, filed, logged and transmitted documents to expert and co-counsel.	0.4	\$ 250.00	\$ 100.00		

Date	Initials	Narrative	Time	Rate	Value	Removed Iodestar	Removed time
6/14/2024	TJM	Prepared for meeting with Dr. Munson regarding proposed damages modeling and worked on same [1.3]; video conference with Dr. Munson and co-counsel regarding same [1.0].	2.3	\$ 675.00	\$ 1,552.50		
6/18/2024	TJM	Worked on case strategy issues and email correspondence with co-counsel regarding same [.1]; email correspondence with client regarding status update [.1].	0.2	\$ 675.00	\$ 135.00		
6/19/2024	TJM	Worked on damages modeling issues and telephone conference with Dr. Munson regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
6/20/2024	TJM	Email correspondence with client regarding interpretation of order on reconsideration [.1].	0.1	\$ 675.00	\$ 67.50		
6/24/2024	TJM	Meeting with Dr. Munson and co-counsel regarding damages modeling [.9].	0.9	\$ 675.00	\$ 607.50		
6/28/2024	TJM	Email correspondence and telephone conference with co-counsel regarding case strategy issues [.2].	0.2	\$ 675.00	\$ 135.00		
7/1/2024	TJM	Researched and analyzed issues regarding burden of proof for wage offsets [.9]; reviewed discovery for information on categories of compensation that defendants intend to argue offset wages owed and drafted memorandum regarding findings [4.1].	5.0	\$ 675.00	\$ 3,375.00		
7/2/2024	EE	Researched damages issues.	0.6	\$ 200.00	\$ 120.00		
7/2/2024	JJB	Worked on migrating case document database to new platform.	1.0	\$ 250.00	\$ 250.00		
7/2/2024	TJM	Researched and analyzed issues regarding factual background related to damages modeling [.4].	0.4	\$ 675.00	\$ 270.00		
7/3/2024	EE	Researched damages issues.	7.2	\$ 200.00	\$ 1,440.00		
7/5/2024	TJM	Researched and analyzed issues regarding factual background related to damages modeling [2.7].	2.7	\$ 675.00	\$ 1,822.50		
7/8/2024	EE	Researched damages issues.	6.6	\$ 200.00	\$ 1,320.00		
7/8/2024	TJM	Researched and analyzed issues regarding factual background related to damages modeling and impact of alleged offsets on damages [3.3].	3.3	\$ 675.00	\$ 2,227.50		
7/9/2024	EE	Researched damages issues [4.8]; drafted email summarizing research [2].	6.8	\$ 200.00	\$ 1,360.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/9/2024	TJM	Continued researching and analyzing issues regarding factual background and law related to damages modeling and impact of alleged offsets on damages and worked on memorandum regarding results of same [2.9].	2.9	\$ 675.00	\$ 1,957.50		
7/10/2024	TJM	Researched and analyzed issues regarding burden of proof for alleged offsets to damages [1.8]; reviewed expert reports and analyzed issues regarding impact of alleged offsets on damages and worked on memorandum regarding results of same [2.6]; email correspondence with co-counsel regarding case strategy issues [1].	4.5	\$ 675.00	\$ 3,037.50		
7/11/2024	TJM	Prepared for telephone conference with co-counsel regarding factual background, damages modeling, and case strategy issues [1]; participated in same [7]; correspondence with Dr. Munson regarding next steps [1]; worked on stipulation regarding case schedule [2]; reviewed expert reports and analyzed issues regarding same [1.0].	2.1	\$ 675.00	\$ 1,417.50		
7/15/2024	HMR	Worked on stipulated motion for entry of case schedule. [3]	0.3	\$ 200.00	\$ 60.00		
7/15/2024	TJM	Correspondence with Dr. Munson and co-counsel regarding proposed case schedule deadlines [1]; continued reviewing and analyzing expert reports and worked on issues raised in court's most recent orders [3].	0.4	\$ 675.00	\$ 270.00		
7/22/2024	TJM	Researched and analyzed issues regarding factual background and case strategy [5]; telephone conference with co-counsel regarding same [5].	1.0	\$ 675.00	\$ 675.00		
7/26/2024	TJM	Worked on contingency fee agreement for Ms. Anderson and email correspondence with co-counsel regarding same [3]; worked on case management issues [1]; worked on damages modeling issues [2.4].	2.8	\$ 675.00	\$ 1,890.00		
7/28/2024	TJM	Worked on damages modeling issues and memorandum regarding same [1.9].	1.9	\$ 675.00	\$ 1,282.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/29/2024	TJM	Worked on damages modeling issues and memorandum regarding same [1.8]; correspondence with co-counsel and Dr. Munson regarding same [1.1].	1.9	\$ 675.00	\$ 1,282.50		
7/31/2024	TJM	Worked on damages modeling issues [.3]; telephone conference with co-counsel regarding same [1.3].	1.6	\$ 675.00	\$ 1,080.00		
8/1/2024	TJM	Prepared for meeting with co-counsel and Dr. Munson regarding damages modeling issues and forthcoming expert report [.6]; participated in same [2.9].	3.5	\$ 675.00	\$ 2,362.50		
8/3/2024	TJM	Video conference with Dr. Munson and co-counsel regarding damages modeling [1.9].	1.9	\$ 675.00	\$ 1,282.50		
8/9/2024	TJM	Worked on damages modeling issues and correspondence with Dr. Munson regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
8/12/2024	TJM	Worked on damages modeling and expert report issues [.3]; meeting with Dr. Munson regarding same [1.2].	1.5	\$ 675.00	\$ 1,012.50		
8/15/2024	TJM	Worked on damages modeling issues and expert report [.6].	0.6	\$ 675.00	\$ 405.00		
8/17/2024	TJM	Worked on damages modeling and outline of revised expert report and researched and analyzed issues regarding same [3.1].	3.1	\$ 675.00	\$ 2,092.50		
8/18/2024	TJM	Worked on damages modeling and revised expert report and researched and analyzed issues regarding same [4.0]	4.0	\$ 675.00	\$ 2,700.00		
8/26/2024	TJM	Worked on damages modeling issues and revised expert report [1.9]; telephone conference with co-counsel regarding same [.3]; video conference with Dr. Munson and co-counsel regarding same [2.8].	5.0	\$ 675.00	\$ 3,375.00		
8/27/2024	TJM	Worked on damages modeling issues and draft of revised expert report [1.4].	1.4	\$ 675.00	\$ 945.00		
8/28/2024	TJM	Worked on damages modeling issues and revised expert report [.6].	0.6	\$ 675.00	\$ 405.00		
8/29/2024	TJM	Video conference with Dr. Munson and co-counsel regarding damages modeling issues and revised expert report [2.7]; worked on same [2.7].	5.4	\$ 675.00	\$ 3,645.00		
8/30/2024	TJM	Worked on revised expert report [.6].	0.6	\$ 675.00	\$ 405.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/9/2024	TJM	Correspondence with Dr. Munson regarding revised expert report [.1]; worked on same [1.2]; video conferences with Dr. Munson's and co-counsel regarding same [4.9].	6.2	\$ 675.00	\$ 4,185.00		
9/10/2024	JJB	Filed and logged expert report and data.	0.1	\$ 250.00	\$ 25.00		
9/11/2024	TJM	Worked on case management issues [.1]; reviewed revised report of Mr. Boedeker, analyzed issues regarding same, and outlined issues with and plan for rebutting same [2.3].	2.4	\$ 675.00	\$ 1,620.00		
9/12/2024	TJM	Continued reviewing revised report of Mr. Boedeker, analyzing issues regarding same, and outlining issues with and plan for rebutting same [3.2]; telephone conference with co-counsel regarding same [1.2]; email to Dr. Munson regarding same [.1].	4.5	\$ 675.00	\$ 3,037.50		
9/13/2024	JJB	Filed and logged documents sent to expert.	0.1	\$ 250.00	\$ 25.00		
9/13/2024	JJB	Set up Box.com credentials to access defendants' production; downloaded and logged defendant's production; transmitted defendant's production to plaintiffs' expert.	0.7	\$ 250.00	\$ 175.00		
9/16/2024	JJB	Correspondence regarding expert production.	0.1	\$ 250.00	\$ 25.00		
9/16/2024	JJB	Worked on expert production.	0.2	\$ 250.00	\$ 50.00		
9/16/2024	TJM	Worked on expert issues [.1].	0.1	\$ 675.00	\$ 67.50		
9/17/2024	JJB	Downloaded and logged files from defendant's expert.	0.1	\$ 250.00	\$ 25.00		
9/17/2024	JJB	Transmitted documents to plaintiff's expert.	0.1	\$ 250.00	\$ 25.00		
9/17/2024	TJM	Worked on expert issues [.2]; video conferences with Dr. Munson regarding revised report of Mr. Boedeker and analysis of issues regarding same [3.1].	3.3	\$ 675.00	\$ 2,227.50		
9/18/2024	TJM	Video conference with Dr. Munson and co-counsel regarding analyses of various issues raised in Mr. Boedeker's revised expert report and rebuttal to same [2.5].	2.5	\$ 675.00	\$ 1,687.50		
9/20/2024	TJM	Video conference with Dr. Munson regarding analysis of Boedeker's revised report and work for rebuttal to same [1.2]; worked on issues regarding same [.2].	1.4	\$ 675.00	\$ 945.00		
9/27/2024	JJB	Worked on document production management.	0.6	\$ 250.00	\$ 150.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
9/27/2024	TJM	Analyzed issues regarding Boedeker's approaches to damages and offsets in revised report, reviewed document production in relation to same, reviewed data analysis in relation to same, and worked on rebuttals to same [2.3].	2.3	\$ 675.00	\$ 1,552.50		
9/30/2024	LAM	Imported Defendant's production into document database [1.1].	1.1	\$ 150.00	\$ 165.00	\$ 165.00	1.1
9/30/2024	TJM	Analyzed issues regarding Boedeker's approaches to damages and offsets in revised report and worked on rebuttals to same [.5].	0.5	\$ 675.00	\$ 337.50		
10/1/2024	TJM	Correspondence with Dr. Munson regarding expert work [.1]; continued analyzing issues regarding Boedeker's approaches to damages and offsets in revised report, reviewing document production in relation to same, reviewing data analysis in relation to same, and working on rebuttals to same [2.7]; video conference with Dr. Munson regarding same [1.9].	4.7	\$ 675.00	\$ 3,172.50		
10/2/2024	TJM	Video conference with Dr. Munson regarding analyses for rebuttal report [.9].	0.9	\$ 675.00	\$ 607.50		
10/3/2024	TJM	Continued analyzing issues regarding Boedeker's approaches to damages and offsets in revised report, reviewing data analysis in relation to same, and working on rebuttals to same [7.1].	7.1	\$ 675.00	\$ 4,792.50		
10/4/2024	TJM	Video conferences with Dr. Munson and co-counsel regarding analyses for rebuttal to Boedeker's revised report [3.3]; worked on same [1.2].	4.5	\$ 675.00	\$ 3,037.50		
10/5/2024	TJM	Worked on draft of Dr. Munson's report rebutting Mr. Boedeker, researched and analyzed issues regarding same, and reviewed data and documents in relation to same [6.7].	6.7	\$ 675.00	\$ 4,522.50		
10/6/2024	TJM	Worked on draft of Dr. Munson's report rebutting Mr. Boedeker, researched and analyzed issues regarding same, and reviewed data and documents in relation to same [7.3].	7.3	\$ 675.00	\$ 4,927.50		
10/7/2024	TJM	Video conference with Dr. Munson and co-counsel regarding expert rebuttal report [1.3]; telephone conference with co-counsel regarding same [.2]; worked on same [2.6].	4.1	\$ 675.00	\$ 2,767.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/8/2024	TJM	Video conference with Dr. Munson and co-counsel regarding data analysis and rebuttal to Mr. Boedeker's report [1.4]; worked on rebuttal to Mr. Boedeker's report and analyzed issues regarding same [3.4]; email correspondence with Dr. Munson regarding same [1.1].	4.9	\$ 675.00	\$ 3,307.50		
10/9/2024	TJM	Video conferences with Dr. Munson regarding draft rebuttal report and analyses for same [5.0]; email correspondence with opposing counsel regarding Dr. Munson's rebuttal report [1.1].	5.1	\$ 675.00	\$ 3,442.50		
10/11/2024	JJB	Downloaded defendant's expert data and produced same to plaintiff's expert; updated production log.	0.3	\$ 250.00	\$ 75.00		
10/15/2024	TJM	Worked on case strategy issues [1.3]; telephone conference with co-counsel regarding same [1.5]; worked on case management issues [1.4]; reviewed Mr. Boedeker's rebuttal report and analyzed issues regarding same [1.0].	2.2	\$ 675.00	\$ 1,485.00		
10/16/2024	TJM	Continued reviewing Mr. Boedeker's rebuttal report and analyzed issues regarding same [1.7]; worked on outline of amended revised report and analyzed issues regarding same [1.0]; correspondence with Dr. Munson regarding same [1.1]; video conference with Dr. Munson regarding same [1.7]; worked on amended revised report and analyzed issues regarding same [1.8].	3.3	\$ 675.00	\$ 2,227.50		
10/17/2024	TJM	Video conference with Dr. Munson regarding calculations for amended revised report [2.1]; worked on same [1.0].	3.1	\$ 675.00	\$ 2,092.50		
10/19/2024	TJM	Worked on amended revised report of Dr. Munson and statement regarding same [1.5]; correspondence with Dr. Munson regarding same [1.1].	1.6	\$ 675.00	\$ 1,080.00		
10/21/2024	JJB	Filed and logged expert report and exhibits.	0.2	\$ 250.00	\$ 50.00		
10/21/2024	TJM	Video conference with Dr. Munson regarding amended revised expert report and statement related to same [1.7]; worked on finalizing same and preparing for service [1.7]; email correspondence with opposing counsel regarding amended revised expert report and proposed dates for deposition of Mr. Boedeker [1.1]; worked on deposition scheduling issues [1.1].	1.6	\$ 675.00	\$ 1,080.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
10/22/2024	TJM	Email from opposing counsel regarding objections to amended expert report [.1]; researched and analyzed issues regarding same [.7].	0.8	\$ 675.00	\$ 540.00		
10/23/2024	TJM	Analyzed issues regarding defendants' request for extension of expert deposition and briefing deadlines and email correspondence with co-counsel regarding same [.4]; email correspondence with opposing counsel regarding same [.1].	0.5	\$ 675.00	\$ 337.50		
10/28/2024	TJM	Email correspondence with opposing counsel regarding status of request for extension on expert deposition and briefing deadlines [.1].	0.1	\$ 675.00	\$ 67.50		
11/1/2024	TJM	Worked on stipulation and proposed order for extension of deadlines on experts and dispositive motions and email correspondence with opposing counsel regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
11/8/2024	HMR	Worked on and finalized notice of 30(b)(1) deposition of Stefan Boedeker; emailed same to counsel for all parties; scheduled court reporter. [.6]	0.6	\$ 200.00	\$ 120.00	\$ 120.00	0.6
11/8/2024	TJM	Analyzed issues regarding scheduling of expert depositions, and correspondence with Dr. Munson and opposing counsel regarding same [.3]; worked on notice of deposition [.1].	0.4	\$ 675.00	\$ 270.00		
11/12/2024	HMR	Emailed deposition link for Stefan Boedeker to counsel for all parties. [.1]	0.1	\$ 200.00	\$ 20.00	\$ 20.00	0.1
11/12/2024	TJM	Worked on preparations for deposition of Mr. Boedeker [.1].	0.1	\$ 675.00	\$ 67.50		
11/13/2024	JJB	Created case in Agile for depositions and set up witness for same; correspondence with opposing counsel regarding Aglie information for witness; updated docket with same.	0.4	\$ 250.00	\$ 100.00		
11/17/2024	TJM	Correspondence with Dr. Munson regarding preparation for deposition [.1].	0.1	\$ 675.00	\$ 67.50		
11/18/2024	TJM	Worked on preparation for deposition of Mr. Boedeker and researched and analyzed issues regarding same [1.1].	1.1	\$ 675.00	\$ 742.50		
11/19/2024	TJM	Reviewed materials in preparation for deposition of Mr. Boedeker, researched and analyzed issues regarding same, and worked on outline of questions for same [6.0].	6.0	\$ 675.00	\$ 4,050.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
11/20/2024	TJM	Reviewed materials in preparation for deposition of Mr. Boedeker, researched and analyzed issues regarding same, and worked on outline of questions for same [3.7].	3.7	\$ 675.00	\$ 2,497.50		
11/21/2024	TJM	Reviewed materials in preparation for deposition of Mr. Boedeker, researched and analyzed issues regarding same, and worked on outline of questions for same [7.7].	7.7	\$ 675.00	\$ 5,197.50		
11/22/2024	JJB	Prepared depositions exhibits.	0.5	\$ 250.00	\$ 125.00		
11/22/2024	TJM	Reviewed materials in preparation for deposition of Mr. Boedeker, researched and analyzed issues regarding same, and worked on outline of questions for same [1.2].	1.2	\$ 675.00	\$ 810.00		
11/23/2024	TJM	Reviewed materials in preparation for deposition of Mr. Boedeker, researched and analyzed issues regarding same, and worked on outline of questions for same [4.4].	4.4	\$ 675.00	\$ 2,970.00		
11/24/2024	JJB	Prepared exhibits for expert deposition.	0.7	\$ 250.00	\$ 175.00		
11/24/2024	TJM	Worked on deposition preparation issues [.4].	0.4	\$ 675.00	\$ 270.00		
11/25/2024	HMR	Worked on plaintiff's amended notice of deposition of Stefan Boedeker. [.3]	0.3	\$ 200.00	\$ 60.00		
11/25/2024	TJM	Email correspondence with opposing counsel regarding cancellation and rescheduling of Mr. Boedeker's deposition [.1]; telephone conference with court reporter regarding same [.1]; worked on amended deposition notice and case management issues [.1].	0.3	\$ 675.00	\$ 202.50		
11/26/2024	HMR	Worked on and finalized plaintiff's amended notice of deposition of Stefan Boedeker; emailed same to counsel for all parties; coordinated court reporter for same. [.5]	0.5	\$ 200.00	\$ 100.00		
11/26/2024	TJM	Email correspondence with client regarding status of case [.1].	0.1	\$ 675.00	\$ 67.50		
12/4/2024	TJM	Prepared for meeting with Dr. Munson regarding upcoming deposition [1.0].	1.0	\$ 675.00	\$ 675.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/5/2024	TJM	Prepared for meeting with Dr. Munson in advance of deposition [.8]; video conferences with Dr. Munson to prepare for deposition [3.6]; email correspondence with opposing counsel and Dr. Munson regarding deposition exhibits [.1]; reviewed and analyzed issues regarding same [.3].	4.8	\$ 675.00	\$ 3,240.00		
12/6/2024	TJM	Video conference with Dr. Munson regarding preparation for deposition [1.0]; participated in Dr. Munson's deposition [7.5]; telephone conference with Dr. Munson regarding deposition [.3].	8.8	\$ 675.00	\$ 5,940.00		
12/7/2024	TJM	Email correspondence with opposing counsel regarding information for Mr. Boedeker's deposition [.1].	0.1	\$ 675.00	\$ 67.50		
12/8/2024	TJM	Worked on outline of questions for Mr. Boedeker [1.0].	1.0	\$ 675.00	\$ 675.00		
12/9/2024	TJM	Prepared for deposition of Mr. Boedeker [.5]; participated in same [6.6].	7.1	\$ 675.00	\$ 4,792.50		
12/15/2024	TJM	Worked on outline of motion for summary judgment and outline of Daubert motion [.6].	0.6	\$ 675.00	\$ 405.00		
12/18/2024	JB	Researched and analyzed cases calculating impact of premiums paid and overtime liability [4.1].	4.1	\$ 400.00	\$ 1,640.00	\$ 1,640.00	4.1
12/18/2024	JJB	Filed expert deposition.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
12/18/2024	TJM	Worked on outline of summary judgment and Daubert motions [.6].	0.6	\$ 675.00	\$ 405.00		
12/19/2024	TJM	Worked on outline of summary judgment and Daubert motions and researched and analyzed issues regarding same [2.0]; telephone conference with co-counsel regarding same [.5].	2.5	\$ 675.00	\$ 1,687.50		
12/21/2024	TJM	Researched and analyzed issues to be raised in summary judgment and Daubert motions [3.1].	3.1	\$ 675.00	\$ 2,092.50		
12/22/2024	JJB	Downloaded and filed deposition testimony; transmitted same to co-counsel.	0.2	\$ 250.00	\$ 50.00	\$ 50.00	0.2
12/23/2024	AMS	Reviewed orders and expert report [1.0]; researched relevant Daubert standards [2.5].	3.5	\$ 650.00	\$ 2,275.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
12/23/2024	TJM	Worked on plan for conducting research for Daubert motion [.2]; researched and analyzed issues to be raised in summary judgment and Daubert motions and worked on outline of arguments for same [2.5].	2.7	\$ 675.00	\$ 1,822.50		
12/24/2024	TJM	Researched and analyzed issues to be raised in summary judgment and Daubert motions and worked on outline of arguments for same [1.5].	1.5	\$ 675.00	\$ 1,012.50		
12/26/2024	AMS	Researched expert issues [3.8].	3.8	\$ 650.00	\$ 2,470.00		
12/26/2024	HMR	Worked on plaintiff's motion for summary judgment, proposed order granting same, plaintiff's motion to exclude expert testimony and proposed order. [.5]	0.5	\$ 200.00	\$ 100.00		
12/26/2024	TJM	Worked on motions for summary judgment and to exclude expert testimony [.2].	0.2	\$ 675.00	\$ 135.00		
12/27/2024	AMS	Continued researching expert issues [2.2]; drafted legal section for motion to exclude [1.6].	3.8	\$ 650.00	\$ 2,470.00		
12/28/2024	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [6.5].	6.5	\$ 675.00	\$ 4,387.50		
12/29/2024	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [6.8].	6.8	\$ 675.00	\$ 4,590.00		
12/30/2024	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [2.5].	2.5	\$ 675.00	\$ 1,687.50		
12/31/2024	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [5.1].	5.1	\$ 675.00	\$ 3,442.50		
1/1/2025	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [6.8].	6.8	\$ 675.00	\$ 4,590.00		
1/2/2025	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [7.2].	7.2	\$ 675.00	\$ 4,860.00		
1/3/2025	TJM	Worked on motion for summary judgment and researched and analyzed issues regarding same [2.5]; email correspondence with co-counsel regarding same [.1].	2.6	\$ 675.00	\$ 1,755.00		
1/4/2025	TJM	Correspondence with Dr. Munson regarding declaration in support of summary judgment [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/5/2025	TJM	Worked on motion to exclude testimony of Boedeker and researched and analyzed issues regarding same [5.0]; worked on motion for summary judgment and email correspondence with co-counsel regarding same [.3].	5.3	\$ 675.00	\$ 3,577.50		
1/6/2025	HMR	Worked on declarations of Toby J. Marshall and Jeffrey Munson in support of plaintiff's motion for summary judgment and motion to exclude expert testimony. [.3]	0.3	\$ 200.00	\$ 60.00		
1/6/2025	TJM	Worked on declarations in support of motion for summary judgment [.1]; worked on motion to exclude testimony of Boedeker and researched and analyzed issues regarding same [8.2].	8.3	\$ 675.00	\$ 5,602.50		
1/7/2025	JJB	Worked on motion for summary judgment.	0.2	\$ 250.00	\$ 50.00		
1/7/2025	TJM	Worked on motion to exclude testimony of Boedeker and researched and analyzed issues regarding same [6.3].	6.3	\$ 675.00	\$ 4,252.50		
1/8/2025	HMR	Worked on declaration of Jeffrey Munson in support of plaintiff's motion for summary judgment and motion to exclude expert testimony. [.4]	0.4	\$ 200.00	\$ 80.00		
1/8/2025	LAM	Worked on summary judgment exhibits [2.7].	2.7	\$ 150.00	\$ 405.00	\$ 405.00	2.7
1/8/2025	TJM	Worked on plaintiff's motion for summary judgment and supporting declarations [2.4]; email correspondence with opposing counsel regarding impact of announced closure on filing deadlines [.1]; correspondence with Dr. Munson regarding declaration [.1]; worked on motion to exclude expert testimony [2.8].	5.4	\$ 675.00	\$ 3,645.00		
1/9/2025	JJB	Worked on facts in support of motion for summary judgment and motion to exclude expert.	1.5	\$ 250.00	\$ 375.00		
1/9/2025	LAM	Worked on exhibits and drafting declaration for motion for summary judgment and motion to exclude [1.8].	1.8	\$ 150.00	\$ 270.00	\$ 270.00	1.8

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/9/2025	TJM	Video conference with Dr. Munson regarding declaration in support of motions for summary judgment and to exclude expert [.3]; worked on motion to exclude expert [2.7]; telephone conference with co-counsel regarding same [.3]; worked on summary judgment motion [1.2]; email correspondence with opposing counsel regarding confidential designation on document to be filed in support of summary judgment motion [.1].	4.6	\$ 675.00	\$ 3,105.00		
1/10/2025	HMR	Worked on and finalized plaintiff's motion to exclude expert testimony, plaintiff's motion for summary judgment, declaration of Toby J. Marshall with exhibits, declaration of Jeffrey Munson with exhibits and proposed order. [2].	2.0	\$ 200.00	\$ 400.00		
1/10/2025	LAM	Worked on declaration and exhibits for motion for summary judgment [1.1].	1.1	\$ 150.00	\$ 165.00	\$ 165.00	1.1
1/10/2025	TJM	Worked on finalizing motions for summary judgment and to exclude expert and supporting documents [2.8].	2.8	\$ 675.00	\$ 1,890.00		
1/12/2025	TJM	Reviewed defendants' motion to exclude Dr. Munson and for summary judgment and researched and analyzed issues regarding same [.6].	0.6	\$ 675.00	\$ 405.00		
1/13/2025	HMR	Worked on response and declaration in opposition to defendants' motion to exclude expert testimony and for summary judgment. [.4]	0.4	\$ 200.00	\$ 80.00		
1/13/2025	TJM	Continued reviewing defendants' motion to exclude Dr. Munson and for summary judgment and researching and analyzing issues regarding same [1.2].	1.2	\$ 675.00	\$ 810.00		
1/14/2025	JB	Researched law of the case doctrine for summary judgment response brief [.8].	0.8	\$ 400.00	\$ 320.00	\$ 320.00	0.8
1/14/2025	TJM	Continued reviewing defendants' motion to exclude Dr. Munson and for summary judgment and researching and analyzing issues regarding same [2.0].	2.0	\$ 675.00	\$ 1,350.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/15/2025	TJM	Analyzed issues regarding ADR requirement and settlement strategy [.3]; worked on outline of response to defendants' motion to exclude Dr. Munson and for summary judgment [.3]; telephone conference with co-counsel regarding same [.7]; reviewed transcript of Dr. Munson deposition for errors and for use in response to defendants' motion to exclude Dr. Munson [1.0].	2.3	\$ 675.00	\$ 1,552.50		
1/16/2025	HMR	Worked on and finalized errata for Jeffrey Munson deposition; sent to Mr. Munson via docusign for signature. [.3]	0.3	\$ 200.00	\$ 60.00		
1/16/2025	JJB	Filed deposition errata and managed deposition testimony.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
1/16/2025	TJM	Continued reviewing transcript of Dr. Munson deposition for errors and for use in response to defendants' motion to exclude Dr. Munson [2.0]; worked on errata sheet [.2]; video conference with Dr. Munson regarding same [.4]; worked on response to motion to exclude Dr. Munson and researched and analyzed issues regarding same [.9].	3.5	\$ 675.00	\$ 2,362.50		
1/17/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment [1.1].	1.1	\$ 675.00	\$ 742.50		
1/18/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment and researched and analyzed issues regarding same [3.0].	3.0	\$ 675.00	\$ 2,025.00		
1/19/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment and researched and analyzed issues regarding same [4.5].	4.5	\$ 675.00	\$ 3,037.50		
1/20/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment and researched and analyzed issues regarding same [5.7].	5.7	\$ 675.00	\$ 3,847.50		
1/21/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment and researched and analyzed issues regarding same [4.1].	4.1	\$ 675.00	\$ 2,767.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/22/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment and researched and analyzed issues regarding same [6.9].	6.9	\$ 675.00	\$ 4,657.50		
1/23/2025	JJB	Downloaded and saved errata.	0.1	\$ 250.00	\$ 25.00	\$ 25.00	0.1
1/23/2025	LAM	Pulled exhibits and drafted declaration in support of response to Defendant's motion for summary judgment [1.1].	1.1	\$ 150.00	\$ 165.00	\$ 165.00	1.1
1/23/2025	TJM	Worked on response to defendants' motion to exclude Dr. Munson and for summary judgment [4.0]; worked on declaration in support of same [.1].	4.1	\$ 675.00	\$ 2,767.50		
1/24/2025	TJM	Worked on finalizing response to motion to exclude Dr. Munson and for summary judgment and related declaration and proposed order [.5].	0.5	\$ 675.00	\$ 337.50		
1/27/2025	TJM	Reviewed defendants' response to motion for summary judgment, researched and analyzed issues regarding same, and worked on outline of issues to address in reply [1.9].	1.9	\$ 675.00	\$ 1,282.50		
1/28/2025	TJM	Reviewed defendants' response to motion to exclude Mr. Boedeker and worked on plan for replying to same [.4]; worked on reply in support of motion for summary judgment and researched and analyzed issues regarding same [8.4]	8.8	\$ 675.00	\$ 5,940.00		
1/29/2025	TJM	Continued working on reply in support of motion for summary judgment and researching and analyzing issues regarding same [8.3]; worked on outline of reply in support of motion to exclude Mr. Boedeker and researched and analyzed issues regarding same [1.2].	9.5	\$ 675.00	\$ 6,412.50		
1/30/2025	HMR	Worked on reply in support of plaintiff's motion to exclude expert testimony. [1]	1.0	\$ 200.00	\$ 200.00		
1/30/2025	TJM	Finalized reply in support of motion for summary judgment [.6]; worked on reply in support of motion to exclude expert testimony and researched and analyzed issues regarding same [7.8].	8.4	\$ 675.00	\$ 5,670.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
1/31/2025	HMR	Worked on and finalized reply in support of motion to exclude expert testimony and reply in support of motion for summary judgment. [1.5]	1.5	\$ 200.00	\$ 300.00		
2/10/2025	TJM	Worked on mediation preparation and email correspondence with co-counsel regarding same [.8].	0.8	\$ 675.00	\$ 540.00		
2/18/2025	TJM	Prepared for mediation and analyzed issues regarding same [.8]; telephone conference with co-counsel regarding mediation strategy [1.0]; analyzed issues regarding additional damage calculations and correspondence with Dr. Munson regarding same [.3]; email correspondence with client regarding status of case [.1].	2.2	\$ 675.00	\$ 1,485.00		
2/19/2025	TJM	Reviewed calculations of offsets under non-proportional approach, analyzed issues regarding same, and email correspondence with Dr. Munson regarding same [.5]; worked on mediation submission and researched and analyzed issues regarding same [1.2]; telephone conference with co-counsel regarding same and mediation strategy [.2].	1.9	\$ 675.00	\$ 1,282.50		
2/20/2025	TJM	Reviewed court's order for supplemental briefing on entry of judgment under Rule 56(f) and analyzed issues regarding same [.3].	0.3	\$ 675.00	\$ 202.50		
2/21/2025	TJM	Reviewed defendant's mediation submission and analyzed issues regarding same [.4]; telephone conference with co-counsel regarding mediation and plan for responding to court's order on summary judgment ruling under Rule 56(f) [.4]; researched and analyzed issues regarding court's order on entry of judgment under Rule 56(f) [.6].	1.4	\$ 675.00	\$ 945.00		
2/22/2025	TJM	Researched and analyzed issues regarding court's order on entry of judgment under Rule 56(f) [1.2].	1.2	\$ 675.00	\$ 810.00		
2/24/2025	HMR	Worked on plaintiff's brief responding to Rule 56(f) notice. [.2]	0.2	\$ 200.00	\$ 40.00		
2/24/2025	TJM	Worked on brief in response to Rule 56(f) notice [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
2/25/2025	TJM	Worked on damages calculation issues [.4]; video conference with Dr. Munson regarding same [1.0]; prepared for mediation [.4].	1.8	\$ 675.00	\$ 1,215.00		
2/26/2025	TJM	Participated in mediation [6.9]; left message with and email to Ms. Hill regarding same [.2]; worked on response to court's Rule 56(f) notice and researched and analyzed issues regarding same [2.2].	9.3	\$ 675.00	\$ 6,277.50		
2/27/2025	TJM	Worked on response to court's Rule 56(f) notice and researched and analyzed issues regarding same [2.7]; email correspondence with co-counsel regarding strategy issues [.2].	2.9	\$ 675.00	\$ 1,957.50		
2/28/2025	HMR	Worked on and finalized plaintiff's brief in response to rule 56(f) notice. [.5]	0.5	\$ 200.00	\$ 100.00		
3/1/2025	TJM	Reviewed defendant's response to minute order on Rule 56(f) and analyzed issues regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
3/11/2025	JN	Responded to class member inquiry.[.4]	0.4	\$ 250.00	\$ 100.00		
3/21/2025	TJM	Reviewed order on cross-motions for summary judgment and analyzed issues regarding same [.4].	0.4	\$ 675.00	\$ 270.00		
3/23/2025	TJM	Continued analyzing order on cross-motions for summary judgment and next steps [.7]; worked on settlement issues [.5].	1.2	\$ 675.00	\$ 810.00		
3/24/2025	TJM	Worked on settlement issues [.4]; telephone conference with co-counsel regarding same and expert work [.8].	1.2	\$ 675.00	\$ 810.00		
3/27/2025	TJM	Telephone conference with co-counsel and mediator regarding further settlement talks [.3]; analyzed issues regarding court's order for supplemental expert report and worked on outline for call with Dr. Munson regarding same [.9].	1.2	\$ 675.00	\$ 810.00		
3/28/2025	TJM	Video conference with Dr. Munson and co-counsel regarding court's order and work to be done for supplemental report [1.6]; correspondence with Judge Kallas and [.1].	1.7	\$ 675.00	\$ 1,147.50		
3/29/2025	TJM	Telephone conference with Judge Kallas and co-counsel regarding mediator's proposal [.3]; telephone conference with co-counsel regarding same [.1]; analyzed issues regarding same and emailed modeling to co-counsel [.4].	0.8	\$ 675.00	\$ 540.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
3/30/2025	TJM	Email correspondence with Judge Kallas and co-counsel regarding mediator's proposal [.1].	0.1	\$ 675.00	\$ 67.50		
3/31/2025	TJM	Reviewed mediator's proposal and email correspondence with co-counsel and mediator regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
4/1/2025	TJM	Worked on supplemental expert report issues [.2]; meeting with Dr. Munson and co-counsel regarding same [1.0].	1.2	\$ 675.00	\$ 810.00		
4/2/2025	TJM	Worked on supplemental report of Dr. Munson and researched and analyzed issues regarding same [5.4].	5.4	\$ 675.00	\$ 3,645.00		
4/3/2025	TJM	Worked on draft supplemental report of Dr. Munson [2.0]; telephone conference with co-counsel regarding same [.4]; video conference with Dr. Munson regarding same [.6]; drafted notice to court regarding submission of same [.1]; telephone conferences and email correspondence with Judge Kallas and co-counsel regarding defendants' response to mediator's proposal [.8]; analyzed issues regarding same [.3].	4.2	\$ 675.00	\$ 2,835.00		
4/4/2025	HMR	Worked on and finalized plaintiff's notice of supplemental expert report. [.5]	0.5	\$ 200.00	\$ 100.00		
4/4/2025	TJM	Video conference with Dr. Munson regarding supplemental report [.8]; worked on finalizing same for filing [.3]; telephone conferences and email correspondence with co-counsel and Judge Kallas regarding mediation [.8].	1.9	\$ 675.00	\$ 1,282.50		
4/7/2025	TJM	Researched and analyzed issues regarding notice of settlement to court [.1]; email correspondence with opposing counsel regarding same [.2]; prepared for call chambers regarding same [.1]; telephone conference with opposing counsel and court clerk regarding settlement [.2]; worked on case management issues [.3]; researched and analyzed issues regarding service awards and email correspondence with co-counsel regarding same [.7]; email correspondence with client [.1].	1.7	\$ 675.00	\$ 1,147.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
4/8/2025	TJM	Reviewed draft stipulated motion to stay deadlines and email correspondence with opposing counsel regarding same [.1]; analyzed issues regarding settlement and next steps [.5]; left message with and email to client regarding same [.2].	0.8	\$ 675.00	\$ 540.00		
4/14/2025	TJM	Worked on case management issues [.1].	0.1	\$ 675.00	\$ 67.50		
5/1/2025	TJM	Email correspondence with opposing counsel regarding status of draft settlement agreement [.1]; worked on plans for preliminary approval motion [.1].	0.2	\$ 675.00	\$ 135.00		
5/5/2025	AMS	Worked on motion for preliminary approval [2.3].	2.3	\$ 650.00	\$ 1,495.00		
5/5/2025	HMR	Worked on motion for preliminary approval, declaration of Toby J. Marshall, and proposed order. [.5]	0.5	\$ 200.00	\$ 100.00		
5/5/2025	TJM	Worked on plan for preparing motion for preliminary approval [.1]; reviewed draft settlement agreement, analyzed issues regarding same, and worked on proposed revisions to same [1.6].	1.7	\$ 675.00	\$ 1,147.50		
5/9/2025	TJM	Worked on draft settlement agreement and analyzed issues regarding same [1.8].	1.8	\$ 675.00	\$ 1,215.00		
5/12/2025	TJM	Worked on settlement agreement, researched and analyzed issues regarding same, and email correspondence with co-counsel regarding same [1.4].	1.4	\$ 675.00	\$ 945.00		
5/13/2025	TJM	Worked on settlement agreement and email correspondence with co-counsel and opposing counsel regarding same [.2]; analyzed issues regarding additional expert analysis needed for settlement and correspondence with Dr. Munson and co-counsel regarding same [.3]; analyzed issues regarding settlement administration bids [.1].	0.6	\$ 675.00	\$ 405.00		
5/14/2025	TJM	Researched and analyzed issues regarding common fund fee awards in Ninth Circuit [.2].	0.2	\$ 675.00	\$ 135.00		
5/15/2025	TJM	Reviewed Excel workbook from Dr. Munson regarding damages calculations for settlement allocation analysis [.3].	0.3	\$ 675.00	\$ 202.50		
5/16/2025	TJM	Worked on class member damages calculations for settlement allocation [.1]; telephone conference with Dr. Munson regarding same [.3].	0.4	\$ 675.00	\$ 270.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/19/2025	AMS	Worked on motion for preliminary approval, related research [4.5].	4.5	\$ 650.00	\$ 2,925.00		
5/19/2025	TJM	Analyzed issues regarding settlement approval [.2]; reviewed calculations from Dr. Munson and analyzed issues regarding revised damages calculations and settlement allocation [1.6]; worked on draft third amended complaint [.8].	2.6	\$ 675.00	\$ 1,755.00		
5/20/2025	AMS	Worked on motion for preliminary approval [3.5].	3.5	\$ 650.00	\$ 2,275.00		
5/20/2025	TJM	Worked on draft of third amended complaint and analyzed issues regarding continuity with settlement agreement [.4]; worked on draft class notice form [.8]; analyzed issues regarding settlement allocations [.5]; telephone conference with co-counsel regarding settlement issues and drafts of various documents [.4]; worked on preliminary approval issues [.2].	2.3	\$ 675.00	\$ 1,552.50		
5/21/2025	AMS	Worked on motion for preliminary approval [3.4].	3.4	\$ 650.00	\$ 2,210.00		
5/21/2025	TJM	Worked on settlement and notice issues [.2].	0.2	\$ 675.00	\$ 135.00		
5/22/2025	AMS	Worked on motion for preliminary approval [3.5].	3.5	\$ 650.00	\$ 2,275.00		
5/23/2025	AMS	Worked on motion for preliminary approval, related research [2.8].	2.8	\$ 650.00	\$ 1,820.00		
5/26/2025	TJM	Analyzed bids from potential settlement administrators [.2].	0.2	\$ 675.00	\$ 135.00		
5/27/2025	AMS	Worked on motion for preliminary approval, related research [4.2]; drafted proposed order [1.6].	5.8	\$ 650.00	\$ 3,770.00		
5/27/2025	TJM	Worked on issues regarding settlement and preliminary approval [.1]; reviewed Defendants' proposed revisions to settlement agreement and analyzed issues regarding same [.5].	0.6	\$ 675.00	\$ 405.00		
5/28/2025	TJM	Worked on proposed revisions to draft settlement agreement [.3]; worked on motion for preliminary approval and researched and analyzed issues regarding same [1.9].	2.2	\$ 675.00	\$ 1,485.00		
5/29/2025	AMS	Revised motion for preliminary approval and proposed order [1.0]; drafted Anderson declaration [.7]; drafted motion for overlength brief and proposed order [.3]; drafted Marshall declaration [.3].	2.3	\$ 650.00	\$ 1,495.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
5/29/2025	HMR	Worked on plaintiff's motion for leave to file overlength brief, proposed order and declaration of Michelle Anderson. [.5]	0.5	\$ 200.00	\$ 100.00		
5/29/2025	TJM	Worked on motion for preliminary approval and researched and analyzed issues regarding same [1.2]; worked on proposed order granting same [.2]; worked on proposed revisions to draft settlement agreement [.3]; email to opposing counsel regarding same [.1]; worked on draft declaration of Ms. Anderson in relation to motion for preliminary approval and researched and analyzed issues regarding same [.4].	2.2	\$ 675.00	\$ 1,485.00		
5/30/2025	AMS	Drafted Marshall declaration in support of preliminary approval motion [.5].	0.5	\$ 650.00	\$ 325.00		
5/30/2025	TJM	Worked on declarations in support of preliminary approval [1.2]; worked on motion for preliminary approval [.1].	1.3	\$ 675.00	\$ 877.50		
6/2/2025	AMS	Revised motion for preliminary approval [.3].	0.3	\$ 650.00	\$ 195.00		
6/2/2025	TJM	Worked on issues regarding motion for preliminary approval [.1].	0.1	\$ 675.00	\$ 67.50		
6/3/2025	TJM	Worked on settlement agreement and preliminary approval issues [.5]; email correspondence with co-counsel and opposing counsel regarding same [.1].	0.6	\$ 675.00	\$ 405.00		
6/4/2025	HMR	Worked on and finalized motion for leave to file overlength brief and proposed order. [.2]	0.2	\$ 200.00	\$ 40.00		
6/4/2025	TJM	Worked on finalizing motion for over-length brief and email correspondence with co-counsel regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
6/6/2025	TJM	Reviewed defendants' proposed revisions to settlement agreement and email correspondence with opposing counsel and co-counsel regarding same [.2]; analyzed issues regarding dispute over same [.1]; worked on declaration in support of motion for preliminary approval [.1].	0.4	\$ 675.00	\$ 270.00		
6/9/2025	AMS	Reviewed and incorporated defendants' revisions to motion for preliminary approval and proposed order [.3].	0.3	\$ 650.00	\$ 195.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
6/9/2025	TJM	Researched and analyzed issues regarding permissible scope of releases in class action settlements and email correspondence with co-counsel regarding same and negotiations with defendants [1.0]; reviewed proposed revisions from opposing counsel to various documents and prepared for meeting regarding same and scope of release [.5].	1.5	\$ 675.00	\$ 1,012.50		
6/10/2025	TJM	Reviewed proposed edits from opposing counsel, analyzed issues regarding disputes over certain settlement terms, and prepared for meeting with opposing counsel regarding same [.5]; participated in meeting with opposing counsel regarding same [.6].	1.1	\$ 675.00	\$ 742.50		
6/16/2025	TJM	Drafted memorandum to co-counsel regarding call with opposing counsel about settlement agreement disputes and analyzed issues regarding same [.6].	0.6	\$ 675.00	\$ 405.00		
6/23/2025	AMS	Revised preliminary approval motion to address changes in settlement agreement [.4].	0.4	\$ 650.00	\$ 260.00		
6/23/2025	TJM	Reviewed and analyzed issues regarding defendants' proposed revisions to settlement agreement and motion for preliminary approval and email correspondence with co-counsel regarding same [.3]; worked on edits to settlement agreement, motion for preliminary approval, and proposed order granting preliminary approval [1.1]; email to opposing counsel regarding same [.1].	1.5	\$ 675.00	\$ 1,012.50		
7/2/2025	TJM	Reviewed proposed revisions to settlement agreement and analyzed issues regarding same [.4]; email correspondence with co-counsel regarding same [.1].	0.5	\$ 675.00	\$ 337.50		
7/3/2025	TJM	Worked on finalizing settlement agreement and draft notice form [.6]; email to opposing counsel regarding same [.1]; worked on motion for preliminary approval [.2].	0.9	\$ 675.00	\$ 607.50		
7/9/2025	TJM	Email correspondence with opposing counsel regarding status of settlement agreement [.1].	0.1	\$ 675.00	\$ 67.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
7/12/2025	TJM	Telephone conference with Ms. Hill regarding settlement agreement [.2]; left message with Ms. Anderson regarding same [.1]; worked on settlement issues [.2].	0.5	\$ 675.00	\$ 337.50		
7/14/2025	HMR	Emailed settlement agreement to client and co-counsel for signature via docusign. [.3]	0.3	\$ 200.00	\$ 60.00	\$ 60.00	0.3
7/14/2025	TJM	Executed settlement agreement and email correspondence with co-counsel regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
7/15/2025	TJM	Email correspondence with opposing counsel regarding status of execution of settlement agreement [.1].	0.1	\$ 675.00	\$ 67.50		
7/18/2025	AMS	Reviewed and finalized motion for preliminary approval, proposed order, and declarations [3.1]; emails with defense counsel regarding motion [.3].	3.4	\$ 650.00	\$ 2,210.00		
7/18/2025	HMR	Worked on and finalized plaintiff's unopposed motion for preliminary approval of class action settlement, declaration of Daniel Johnson, declaration of Toby J. Marshall, proposed order. [2]	2.0	\$ 200.00	\$ 400.00		
7/18/2025	KB	Filed motion for preliminary approval with supporting declarations[.5]. Provided word version of proposed order to the judge[.1]. Filed third amended complaint[.3]	0.9	\$ 200.00	\$ 180.00	\$ 180.00	0.9
7/21/2025	TJM	Analyzed issues regarding class member inquiries [.3]; worked on plan for tracking updates to class member contact information [.3].	0.6	\$ 675.00	\$ 405.00		
7/22/2025	TJM	Worked on class member data issues [.2].	0.2	\$ 675.00	\$ 135.00		
7/23/2025	JN	Responded to class member inquiries.	0.2	\$ 250.00	\$ 50.00		
7/29/2025	AMS	Reviewed order granting preliminary approval of settlement and analyzed related deadlines[.2].	0.2	\$ 650.00	\$ 130.00		
7/29/2025	TJM	Reviewed order granting preliminary approval of settlement and worked on case management issues [.2].	0.2	\$ 675.00	\$ 135.00		
7/31/2025	TJM	Analyzed issues regarding settlement administration and email correspondence with administrator regarding same [.1].	0.1	\$ 675.00	\$ 67.50		
8/7/2025	TJM	Analyzed issues regarding settlement administration and email correspondence with co-counsel regarding same [.3].	0.3	\$ 675.00	\$ 202.50		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/12/2025	JN	Reviewed email from Ms. Singh regarding data production and prepared email regarding same.[.1]; worked on processing of class lists.[.2]	0.3	\$ 250.00	\$ 75.00		
8/12/2025	TJM	Email correspondence with client regarding status of settlement approval and administration [.1]; analyzed issues regarding same and worked on plan for calculating estimated settlement payments [1.5]; email correspondence with settlement administrator regarding class list [.1].	1.7	\$ 675.00	\$ 1,147.50		
8/13/2025	JN	Reviewed email regarding methodology for calculating damages and prepared response to same.[.1]	0.2	\$ 250.00	\$ 50.00		
8/13/2025	JN	Prepared summary of issues with settlement award calculations. [.4]	0.4	\$ 250.00	\$ 100.00		
8/13/2025	JN	Worked on damages calculations. [1.1]	1.1	\$ 250.00	\$ 275.00		
8/13/2025	KB	Updated caption form to reflect change of firm and address for defense counsel [.2].	0.2	\$ 200.00	\$ 40.00	\$ 40.00	0.2
8/13/2025	TJM	Telephone conference with co-counsel regarding calculations of estimated awards [.2]; worked on same [.6].	0.8	\$ 675.00	\$ 540.00		
8/14/2025	AMS	Revised notice [.2]; email with Mr. Johnson [.1].	0.3	\$ 650.00	\$ 195.00		
8/14/2025	JN	Worked on revised damages analysis [.1]; analyzed issues with class list [.2]; worked on class list issues [.8].	1.1	\$ 250.00	\$ 275.00		
8/14/2025	TJM	Analyzed issues regarding settlement administration and email correspondence with settlement administrator and co-counsel regarding same [.2]; worked on class list issues [.1]; worked on calculations of estimated settlement payments and email to co-counsel regarding same [1.4].	1.7	\$ 675.00	\$ 1,147.50		
8/15/2025	JN	Worked on data analysis [2.7]	2.7	\$ 250.00	\$ 675.00		
8/15/2025	TJM	Worked on estimated payment calculations, draft settlement notice, and other settlement administration issues [2.6]; email correspondence with co-counsel regarding same [.2]; email correspondence with opposing counsel and settlement administrator regarding same [.2].	3.0	\$ 675.00	\$ 2,025.00		

Date	Initials	Narrative	Time	Rate	Value	Removed lodestar	Removed time
8/19/2025	JN	Worked on settlement administration issues [.4]; reviewed email from Ms. Singh regarding settlement award discrepancies.[.1]; personal conference regarding recalculation of settlement awards.[.1]; recalculated settlement awards and prepared list.[.6]	1.2	\$ 250.00	\$ 300.00		
8/19/2025	TJM	Email correspondence with administrator regarding estimated settlement awards [.1]; worked on calculations of same [.3].	0.4	\$ 675.00	\$ 270.00		
8/20/2025	JN	Finalized class list [.3]; email to Ms. Singh enclosing new class list. [.1]	0.4	\$ 250.00	\$ 100.00		
8/20/2025	TJM	Worked on estimates of class member settlement payments [.2].	0.2	\$ 675.00	\$ 135.00		
8/21/2025	JN	Reviewed draft notice from Ms. Singh. [.1]	0.1	\$ 250.00	\$ 25.00		
8/21/2025	TJM	Reviewed final draft of settlement notice and email correspondence with co-counsel and settlement administrator regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
8/24/2025	TJM	Analyzed issues regarding settlement administration and email correspondence with administrator regarding same [.2].	0.2	\$ 675.00	\$ 135.00		
8/25/2025	AMS	Worked on notice issues and related emails [.3].	0.3	\$ 650.00	\$ 195.00		
8/25/2025	JN	Reviewed final list from settlement administrator.	0.2	\$ 250.00	\$ 50.00		
		Total	3084.0		\$ 1,701,157.50	\$ 21,710.00	101.6
		Total time less removed time					2982.4
		Total lodestar less removed lodestar				\$ 1,679,447.50	