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THE HONORABLE ADRIENNE McCOY
Department 54
Noted for Hearing: March 4, 2024
With Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF KING

COLUMBIA DEBT RECOVERY, LLC, a Washington
limited liability company,

Plaintiff/
Counterclaim-Defendant,

vs.

JORDAN PIERCE, an individual, and DONTE
GARDINER, an individual,

Defendants/
Counterclaim-Plaintiffs,

and

GUSTAVO CORTEZ, TOWANA PELTIER and
DARIUS MOSELY,

Third-Party Plaintiffs,

vs.

COLUMBIA DEBT RECOVERY, LLC, a Washington
limited liability company,

Third-Party Defendant,

NO. 20-2-16403-8 SEA

**DECLARATION OF BLYTHE H. CHANDLER IN
SUPPORT OF DEFENDANT/COUNTERCLAIM-
PLAINTIFFS/THIRD-PARTY PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES, COSTS
AND SERVICE AWARDS**

DECLARATION OF BLYTHE H. CHANDLER IN SUPPORT OF
DEFENDANT/COUNTERCLAIM-PLAINTIFFS/THIRD-PARTY
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS

Case No. 20-2-16403-8 SEA

<p style="text-align: center;">and</p> <p>JORDAN PIERCE, DONTE GARDINER, THOMAS G. HELLER, MARY ASHLEY ANCHETA, BETHANY HANSON, MEGAN SHANHOLTZER, CRYSTAL PAWLOWSKI, AND TALIA LUCKEN,</p> <p style="text-align: center;">Third-Party Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>THRIVE COMMUNITIES MANAGEMENT, LLC, a Washington limited liability company, THRIVE COMMUNITIES, INC., a Washington corporation, and BELKORP HOLDINGS, INC., a Washington Corporation d/b/a THE EDEN,</p> <p style="text-align: center;">Third-Party Defendants.</p>	
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I, Blythe H. Chandler, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC (Terrell Marshall), counsel of record for Defendant/Counterclaim-Plaintiffs/Third-Party Plaintiffs 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 Defendant/Counterclaim-Plaintiffs/Third-Party Plaintiffs Motion for Attorneys’ Fees, Costs and Service Awards. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex civil and commercial litigation with an emphasis on consumer protection, product defect, civil rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel representing multi-state and nationwide classes in state and federal court in Washington and throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have

1 represented scores of classes, tried class actions in state and federal court, and obtained
2 hundreds of millions of dollars in monetary relief to workers, consumers, and other individuals.

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

18 **A. Qualifications of other Terrell Marshall attorneys.**

19 4. Beth E. Terrell is a founding member of Terrell Marshall. With over twenty years
20 of experience, Ms. Terrell concentrates her practice in complex litigation, including the
21 prosecution of consumer protection, defective product, and wage and hour class actions. Ms.
22 Terrell has served as co-lead counsel on multi-state, multi-district, and nationwide class actions,
23 resulting in hundreds of millions of dollars in settlements for consumers and workers. Ms.
24 Terrell also represents individual employees with wage and hour, workplace exposure, and
25 discrimination claims. Ms. Terrell has tried and won cases in state and federal courts and
26 argued before the Washington State Court of Appeals and the Washington State Supreme Court

1 as well as several federal circuit level courts. Ms. Terrell served as the President of the Public
2 Justice Foundation Board of Directors from July 2019 to July 2020, serves on the Equal Justice
3 Works' Board of Counselors, and is Chair of both the Northwest Consumer Law Center and the
4 Washington Employment Lawyers Association. A member of the State Bar of California and the
5 Washington State Bar Association, Ms. Terrell Co-Chairs PLI's Consumer Financial Services
6 Institute, and frequently presents on a wide variety of topics, including class actions, consumer
7 protection, legal ethics, gender equity, and electronic discovery.

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

17 6. Elizabeth A. Adams joined Terrell Marshall in 2015 and became a member of
18 Terrell Marshall in 2022. Ms. Adams concentrates her practice in complex litigation, including
19 the prosecution of consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams
20 received her J.D. from the UCLA School of Law, where she received the Order of the Coif and
21 served as a Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms.
22 Adams served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu,
23 and the Honorable John A. Kronstadt, all of the United States District Court for the Central
24 District of California.

25 7. Jasmin Rezaie joined Terrell Marshall as an associate in 2022, and concentrates
26 her practice in complex civil litigation. Jasmin graduated from Seattle University School of Law

1 in 2022. During law school, she interned with the Washington State Labor Council, Columbia
2 Legal Services, the ACLU of Washington, and Chief Justice González’s chambers in the
3 Washington Supreme Court. Before law school, Jasmin worked as an immigration paralegal.

4 8. Brittany Glass was an associate with Terrell Marshall from 2018 to 2021. Ms.
5 Glass practices complex litigation, including the prosecution of consumer, wage and hour, and
6 civil rights class actions. In 2014, Ms. Glass received her J.D. from the University of Texas School
7 of Law, Order of the Coif. Before joining Terrell Marshall, Ms. Glass was an associate at Nix,
8 Patterson & Roach in Austin, Texas. Ms. Glass was a member of the Washington Employment
9 Lawyers Association and the Washington State Association for Justice

10 9. Sarah Smith was an associate with Terrell Marshall from 2021 to 2022. Ms. Smith
11 concentrated her practice on complex civil litigation, including the prosecution of consumer and
12 employment class actions. Ms. Smith received her J.D. from the University of Washington,
13 graduating with honors in 2019. Before joining Terrell Marshall, Ms. Smith served as law clerk
14 to the Honorable Stanley A. Bastian in the Eastern District of Washington.

15 **B. The prosecution of this action.**

16 10. Tenants propounded written discovery to CDR in December 2020. The parties
17 met and conferred by phone and had numerous written exchanges about the scope and
18 substance of CDR’s responses.

19 11. Tenants prepared and served CDR with a detailed notice of deposition under CR
20 30(b)(6) in August 2021. After the parties met and conferred regarding the scope of Tenants’
21 deposition notice, Tenants deposed CDR’s CR 30(b)(6) designee, William Wojdak, in September
22 2021.

23 12. Tenants also requested that CDR supplement its responses to two requests for
24 production served before the Tenants’ appeal. CDR served its supplemental responses in March
25 2023, but the responses were still incomplete. Tenants advised CDR that its supplemental
26

1 responses were deficient, and the parties met and conferred, but were unable to resolve their
2 dispute.

3 13. The parties stipulated to stay litigation of the claims alleged by and against CDR
4 to negotiate the Settlement.

5 14. Terrell Marshall has advanced significant costs for and invested numerous hours
6 into the investigation and prosecution of this case. We will continue to commit the time and
7 resources necessary to litigate the case and fairly and adequately represent and protect the
8 interests of the proposed Class(es).

9 15. Since the beginning of this case, Terrell Marshall has worked with no guarantee
10 of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always
11 been contingent on successfully obtaining relief for the third-party plaintiffs and proposed class
12 members. As a result, there was a substantial risk of non-payment, particularly in light of the
13 challenges inherent in this type of case. Work on this case has necessarily been to the exclusion
14 of work on other matters that likely would have generated fees. Terrell Marshall has also been
15 denied use of the fees it earned over the course of this case.

16 16. The work performed by paralegals and legal assistants was work that I or an
17 attorney would have had to perform absent such assistance. In the case of Jodi Nuss, Heather
18 Brown, and Jennifer Boschen, the work required an understanding of the facts and claims at
19 issue in the case and was important to the development of those facts and claims. Indeed, Ms.
20 Nuss's work included data analysis that was instrumental to calculate damages. The work of
21 Holly Rota, Ana Amezega, Bradford Kinsey, Jessica Langsted, and Tanya Stewart required an
22 understanding of relevant legal rules and concepts. All of these staff members are qualified to
23 perform substantive legal work based on their training and past experience working for
24 attorneys.

25 17. Class Counsel have carefully reviewed their time records and segregated out any
26 work that was done on this matter only to advance claims against the landlords. Entries

1 reflecting time spent only on claims against the landlords are not included in the time records
 2 submitted to the Court. In addition, I have excluded arguably duplicative time, such as
 3 significant time spent by Ms. Terrell reviewing work done by associates and other partners on
 4 motions and other pleadings before they were filed.

5 18. The following table identifies the attorneys and staff members from Terrell
 6 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the
 7 timekeepers below I have stated the current hourly rate, the number of hours worked through
 8 October 24, 2023, and the total amount of fees. These time summaries are taken from
 9 contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the
 10 regular course of business.

NAME	POSITION & EXPERIENCE	RATE	HOURS BILLED	TOTAL
ATTORNEYS				
Beth E. Terrell	Founding Member J.D. from Univ. of California, Davis School of Law, 1995	\$550	12.2	\$6,710
Blythe D. Chandler	Member J.D. from Univ. of Washington School of Law, 2010	\$495	125.5	\$62,122.50
Amanda Steiner	Member J.D. from UC Berkeley School of Law, 1997	\$550	52.5	\$28,875.00
Elizabeth A. Adams	Member J.D. from UCLA School of Law, 2012	\$425	8.5	\$3,612.50
Eden Nordby	Associate J.D. from Univ. of Washington School of Law, 2021	\$200	1	\$200.00

NAME	POSITION & EXPERIENCE	RATE	HOURS BILLED	TOTAL
Jasmine Rezaie	Associate J.D. from Seattle Univ. School of Law, 2022	\$275	3.1	\$852.50
Sarah Smith	Associate J.D. from Univ. of Washington School of Law, 2019	\$325	70.6	\$22,945.00
Brittany Glass	Associate J.D. from Univ. of Texas School of Law, 2014	\$325	8.1	\$2,632.50
PARALEGALS/LEGAL ASSISTANTS				
Jennifer Boschen	Senior Paralegal 22 years legal experience	\$175	2.2	\$385.00
Jodi Nuss	Senior Paralegal 9 years legal experience	\$195	4.3	\$838.50
Heather Brown	Paralegal 20 years legal experience	\$150	9.4	\$1,410.00
Jessica Langsted	Legal Assistant 6 years legal experience	\$150	6.2	\$930.00
Bradford Kinsey	Legal Assistant 28 years legal experience	\$125	.9	\$112.50
Holly Rota	Legal Assistant 18 years legal experience	\$125	3.6	\$450.00
Eva Thomas	Legal Assistant 4 years legal experience	\$125	4.7	\$587.50
Tanya Stewart	Legal Assistant 8 years legal experience	\$125	1.8	\$25.00
Ana Amezaga	Legal Assistant 2 years legal experience	\$125	.3	\$37.50
TOTAL:			314.9	\$132,926.00

19. I anticipate the firm will incur additional fees in relation to the approval and settlement administration process. We do not seek additional compensation for this time.

20. The lodestar calculations of Class Counsel are based on reasonable hourly rates. Terrell Marshall sets rates for attorneys and staff members based on a variety of factors,

DECLARATION OF BLYTHE H. CHANDLER IN SUPPORT OF
DEFENDANT/COUNTERCLAIM-PLAINTIFFS/THIRD-PARTY
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS - 7

Case No. 20-2-16403-8 SEA

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

1 including among others: the experience, skill and sophistication required for the types of legal
2 services typically performed; the rates customarily charged in the markets where legal services
3 are typically performed; and the experience, reputation and ability of the attorneys and staff
4 members.

5 21. Terrell Marshall has incurred out-of-pocket litigation expenses totaling
6 \$3,249.19, primarily to cover expenses related to legal research, investigation, filing fees, and
7 administrative costs such as copying, mailing, and messenger expenses. The following chart
8 summarizes Terrell Marshall's litigation costs:

9

10 Category of Expense	Total
11 Court Reporter	\$997.50
12 Filing Fees	\$178.74
13 Transcripts	\$2,072.95
14 TOTAL	\$3,249.19

15

16 22. Attached hereto as Exhibit 1 is a true and correct copy of the Terrell Marshall
17 Law Group fee report for this matter.

18 23. Attached hereto as Exhibit 2 is a true and correct copy of the Final Approval
19 Order in *Jammeh v. HNN Associates, et al.*, Western District of Washington No 2:19-cv-00620-
20 JLR.

21 24. Attached hereto as Exhibit 3 is a true and correct copy of the Order Approving
22 Award of Attorneys' Fees and Costs in *Terrell v Costco Wholesale Corp.*, King County Superior
23 Court No. 16-2-19140-1 SEA.

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

EXECUTED at Seattle, Washington this 27th day of November, 2023.

By: /s/ Blythe H. Chandler, WSBA #43387
Blythe H. Chandler, WSBA #43387

1 **DECLARATION OF SERVICE**

2 I, Blythe H. Chandler, hereby certify that on November 27, 2023, I caused true and
3 correct copies of the foregoing to be served via the means indicated below:

4 Brad Fisher, WSBA #19895
5 Email: bradfisher@dwt.com
6 DAVID WRIGHT TREMAINE LLP
7 920 Fifth Avenue, Suite 3300
8 Seattle, Washington 98104
9 Telephone: (206) 622-3150
10 Facsimile: (206) 757-7700

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

11 Jeffrey I. Hasson, WSBA #23741
12 Email: hasson@hassonlawllc.com
13 HASSON LAW, LLC
14 9385 SW Locust Street
15 Tigard, Oregon 97223
16 Telephone: (503) 255-5352
17 Facsimile: (503) 255-6124

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

18 *Attorneys for Plaintiff/Counterclaim-Defendant*
19 *Columbia Debt Recovery, LLC*

20 William H. Walsh, WSBA #21911
21 Email: wwalsh@cozen.com
22 Karl Neumann, WSBA #48078
23 Email: kneumann@cozen.com
24 Email: krhym@cozen.com
25 Email: dmargulis@cozen.com
26 Email: dbowzer@cozen.com
27 COZEN O'CONNOR
999 Third Avenue, Suite 1900
Seattle, Washington 98104
Telephone: (206) 340-1000

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

28 *Attorneys for Third-Party Defendants Thrive*
29 *Communities Management, LLC and Thrive*
30 *Communities, Inc.*

31 DECLARATION OF BLYTHE H. CHANDLER IN SUPPORT OF
32 DEFENDANT/COUNTERCLAIM-PLAINTIFFS/THIRD-PARTY
33 PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND
34 SERVICE AWARDS - 10
35 Case No. 20-2-16403-8 SEA

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Facsimile: (206) 467-8215

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

*Attorneys for Third-Party Defendant
Belkorp Holdings, Inc., d/b/a The Eden*

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

DATED this 27th day of November, 2023.

By: /s/ Blythe H. Chandler, WSBA #43387
Blythe H. Chandler, WSBA #43387

Exhibit 1

Terrell Marshall Law Group PLLC
Pierce v. Thrive Communities
Matter 2409-001

Date	Initials	Narrative	Units	Rate	Value
4/28/2022	AA	Worked on appendix for motion to stay.	0.3	\$ 125.00	\$ 37.50
		Statement Professional: Ana Amezaga	0.3		\$ 37.50
10/11/2021	AMS	Strategy conference about class certification, worked on motion [7.3].	3.6	\$ 550.00	\$ 1,980.00
10/12/2021	AMS	Worked on class certification motion, strategy conferences [9.8].	4.9	\$ 550.00	\$ 2,695.00
10/13/2021	AMS	Worked on class certification motion and supporting declarations [8.8].	4.4	\$ 550.00	\$ 2,420.00
10/14/2021	AMS	Worked on class certification motion and supporting documents [7.2].	3.6	\$ 550.00	\$ 1,980.00
10/15/2021	AMS	Worked on class certification motion and supporting documents [7.6].	3.8	\$ 550.00	\$ 2,090.00
12/2/2021	AMS	Worked on class certification replies, strategy conference, drafted revised proposed order [5.8].	1.9	\$ 550.00	\$ 1,045.00
2/22/2022	AMS	Class certification hearing prep [1.4].	0.4	\$ 550.00	\$ 220.00
4/18/2022	AMS	Worked on motion for discretionary review, related research, strategy conference [7.6].	2.5	\$ 550.00	\$ 1,375.00
4/19/2022	AMS	Worked on motion for discretionary review, related research [4.7].	1.6	\$ 550.00	\$ 880.00
4/20/2022	AMS	Worked on motion for discretionary review, related research [6.4].	2.1	\$ 550.00	\$ 1,155.00
4/22/2022	AMS	Worked on motion for discretionary review [7.8].	2.6	\$ 550.00	\$ 1,430.00
4/25/2022	AMS	Worked on motion for discretionary review, related research [9.2].	3	\$ 550.00	\$ 1,650.00
4/26/2022	AMS	Worked on motion for discretionary review, related research, worked on appendix, related strategy conference [9.2].	3	\$ 550.00	\$ 1,650.00
4/29/2022	AMS	Finalized motion for discretionary review and appendix [6.6].	2.2	\$ 550.00	\$ 1,210.00
6/10/2022	AMS	Worked on replies to three oppositions to motion for discretionary review [9.4].	3.1	\$ 550.00	\$ 1,705.00
6/11/2022	AMS	Worked on responses to three oppositions to motion for discretionary review [15.2].	5	\$ 550.00	\$ 2,750.00
6/12/2022	AMS	Worked on discretionary review replies [3.0].	1	\$ 550.00	\$ 550.00
6/16/2022	AMS	Worked on reply in support of motion for discretionary review, reviewed court order regarding extension and filing one brief [9.5].	3.1	\$ 550.00	\$ 1,705.00
6/8/2023	AMS	Prepared for and participated in moot for hearing on motion to deny class certification [1.5].	0.7	\$ 550.00	\$ 385.00
		Statement Professional: Amanda Steiner	52.5		\$ 28,875.00

Date	Initials	Narrative	Units	Rate	Value
5/27/2021		Discovery conference with Mr. Fisher on Columbia Debt Recovery's discovery responses [.9]. Video conference with co-counsel to debrief on discovery call with Columbia Debt Recovery [.5].	1.4	\$550.00	\$ 770.00
6/8/2021	BET	Discussed response to Mr. Fisher's letter with Ms. Chandler [.2]	0.2	\$550.00	\$ 110.00
2/2/2022	BET	Exchanged emails with Ms. Chandler regarding scheduling oral argument on class certification [.2]. Discussed class certification argument scheduling with Ms. Terrell [.2].	0.4	\$550.00	\$ 220.00
2/21/2022	BET	Telephone conference with Ms. Chandler regarding class certification argument outline [.5].	0.5	\$550.00	\$ 275.00
2/22/2022	BET	Prepared for argument on motion for class certification [4]. Class certification preparation meeting with co-counsel [1.1].	2.5	\$550.00	\$ 1,375.00
2/23/2022	BET	Prepared for argument on motion for class certification [4.8]	2.4	\$550.00	\$ 1,320.00
2/24/2022	BET	Prepared for argument on motion for class certification [6.6]	3.3	\$550.00	\$ 1,815.00
2/25/2022	BET	Final preparation for hearing on motion for class certification [2]. Oral argument on motion for class certification [1].	1.5	\$550.00	\$ 825.00
		Statement Professional: Beth Terrell	12.2		\$ 6,710.00
11/19/2020	BG	Revised discovery requests to CDR [1.6]	1.6	\$ 325.00	\$ 520.00
11/19/2020	BG	Reviewed affidavit and notice of appearance [0.2]; reviewed rules related to affidavit of prejudice [0.3].	0.2	\$ 325.00	\$ 65.00
11/23/2020	BG	Worked on discovery requests [1.5].	0.7	\$ 325.00	\$ 227.50
11/24/2020	BG	Revised discovery requests to Thrive and CDR [0.9].	0.4	\$ 325.00	\$ 130.00
12/1/2020	BG	Case management [0.1]; reviewed and responded to email from co-counsel [0.1].	0.1	\$ 325.00	\$ 32.50
2/23/2021	BG	Case management [0.2].	0.1	\$ 325.00	\$ 32.50
3/2/2021	BG	Reviewed draft meet and confer letter from co-counsel [0.2]; worked on meet and confer letter from co-counsel [0.5] read and responded to email regarding case management [0.1].	0.4	\$ 325.00	\$ 130.00
3/3/2021	BG	Worked on meet and confer letter for CDR [4.0].	4	\$ 325.00	\$ 1,300.00
3/3/2021	BG	Coordinated drafting of protective order [0.2].	0.1	\$ 325.00	\$ 32.50
3/4/2021	BG	Worked on meet and confer letter for CDR [0.5].	0.5	\$ 325.00	\$ 162.50
		Statement Professional: Britt Glass	8.1		\$ 2,632.50
9/22/2020	BHC	New matter and conflict check; drafted representation agreement [.4].	0.2	\$ 495.00	\$ 99.00

Date	Initials	Narrative	Units	Rate	Value
11/3/2020	BHC	Reviewed final filed complaint [.3].	0.1	\$ 495.00	\$ 49.50
11/19/2020	BHC	Reviewed notices of appearance and request for change of judge [.2].	0.1	\$ 495.00	\$ 49.50
11/20/2020	BHC	Worked on motion to disqualify judge; research regarding same [.3].	0.1	\$ 495.00	\$ 49.50
12/8/2020	BHC	Telephone conference with Mr. Fisher regarding case schedule [.2]; exchanged emails with co-counsel regarding same [.2].	0.4	\$ 495.00	\$ 198.00
12/18/2020	BHC	Email to Mr. Fisher regarding case management matters [.1].	0.1	\$ 495.00	\$ 49.50
1/19/2021	BHC	Email to opposing counsel regarding requested extension and case management [.2].	0.1	\$ 495.00	\$ 49.50
1/22/2021	BHC	Approved discovery requests for service; exchanged emails with staff regarding same [.3].	0.1	\$ 495.00	\$ 49.50
1/29/2021	BHC	Telephone conference with all counsel regarding case management and class certification schedule [.5]; prepared for same [.3].	0.4	\$ 495.00	\$ 198.00
3/5/2021	BHC	Worked on discovery letters to Thrive and CDR [1.1]; worked on document review [.5].	0.8	\$ 495.00	\$ 396.00
3/10/2021	BHC	Read decisions granting summary judgment against Columbia Debt Recovery [.4].	0.4	\$ 495.00	\$ 198.00
3/10/2021	BHC	Exchanged emails with co-counsel and all counsel regarding case management and discovery conference [.4].	0.2	\$ 495.00	\$ 99.00
3/23/2021	BHC	Finalized stipulated protective agreement and sent to staff for submission to court [.2].	0.1	\$ 495.00	\$ 49.50
3/24/2021	BHC	Discussed case management with co-counsel [.3]; email to co-counsel regarding same [.1].	0.2	\$ 495.00	\$ 99.00
3/25/2021	BHC	Worked with staff on discovery requests to Wojdak; emails to co-counsel regarding same [.1].	0.1	\$ 495.00	\$ 49.50
4/9/2021	BHC	Worked on Rule 30(b)(6) Notice to CDR [.3].	0.3	\$ 495.00	\$ 148.50
4/26/2021	BHC	Video conference with co-counsel regarding case management [.4]. Telephone conference with co-counsel regarding same [.3].	0.3	\$ 495.00	\$ 148.50
4/27/2021	BHC	Worked on motion to voluntarily dismiss Salas and documents supporting same [.6]; worked on confirmation of joinder [.2]; approved all documents for filing [.3].	1.1	\$ 495.00	\$ 544.50
4/29/2021	BHC	Reviewed client discovery responses [.9]. Worked with co-counsel and staff on preparing client documents for production [.8]. Reviewed court order granting motion to dismiss Salas and provided copies to all counsel	1.9	\$ 495.00	\$ 940.50

Date	Initials	Narrative	Units	Rate	Value
4/30/2021	BHC	Worked on corrected production of client documents [.3]. Discussed updated discovery responses and document production with co-counsel; approved same for service [.4].	0.7	\$ 495.00	\$ 346.50
5/7/2021	BHC	Meeting with co-counsel regarding discovery, document review, and case management [.6].	0.3	\$ 495.00	\$ 148.50
5/18/2021	BHC	Video conference with co-counsel regarding client discovery responses and related matters [.7].	0.3	\$ 495.00	\$ 148.50
5/20/2021	BHC	Email memo to co-counsel regarding discovery letter to CDR [.2]; telephone calls with co-counsel regarding same [.6]. Worked on discovery correspondence [.5].	1.3	\$ 495.00	\$ 643.50
5/24/2021	BHC	Exchanged numerous emails with co-counsel regarding discovery matters and scheduled meet and confer [.3].	0.1	\$ 495.00	\$ 49.50
5/25/2021	BHC	Read meet and confer letter from Mr. Fisher; exchanged emails with co-counsel regarding same [.2]. Exchanged emails with co-counsel regarding meet and confer preparation [.1].	0.3	\$ 495.00	\$ 148.50
5/25/2021	BHC	Worked on Gardiner amended discovery responses [.6]; reviewed and approved documents for production [.2]. Exchanged emails with co-counsel regarding CR 34 requirements; legal research regarding same [.3]. Worked with staff on document production issues [.1].	1.2	\$ 495.00	\$ 594.00
6/2/2021	BHC	Telephone conference with co-counsel regarding client email production [.5].	0.5	\$ 495.00	\$ 247.50
6/3/2021	BHC	Discussed client deposition scheduling with co-counsel [.5]. Worked with staff on document production [.2].	0.3	\$ 495.00	\$ 148.50
6/4/2021	BHC	Reviewed discovery correspondence from Mr. Fisher; email to co-counsel regarding same [.4].	0.4	\$ 495.00	\$ 198.00
6/7/2021	BHC	Worked on primary witness disclosure [.8].	0.4	\$ 495.00	\$ 198.00
6/8/2021	BHC	Worked on response to Mr. Fisher's letter regarding discovery [1.5]; discussed same with Ms. Terrell [.2].	1.7	\$ 495.00	\$ 841.50
6/8/2021	BHC	Worked on Rule 30(b)(6) notice [.8].	0.8	\$ 495.00	\$ 396.00
6/9/2021	BHC	Worked on letter to Mr. Fisher regarding discovery matters and sent same [1].	1	\$ 495.00	\$ 495.00
6/9/2021	BHC	Video conference with co-counsel regarding case management [.6].	0.3	\$ 495.00	\$ 148.50
6/14/2021	BHC	Worked on case schedule issues [.2]. Worked on motion for leave to amend answer and counterclaims [.2].	0.2	\$ 495.00	\$ 99.00

Date	Initials	Narrative	Units	Rate	Value
6/16/2021	BHC	Responded to Mr. Fisher's request to extend time to provide supplemental class data [.2].	0.2	\$ 495.00	\$ 99.00
6/18/2021	BHC	Email to Mr. Fisher regarding client supplement [.1].	0.1	\$ 495.00	\$ 49.50
7/26/2021	BHC	Email to Mr. Fisher regarding deposition schedule [.2].	0.2	\$ 495.00	\$ 99.00
8/5/2021	BHC	Exchanged emails with co-counsel regarding case strategy and discovery [.2].	0.1	\$ 495.00	\$ 49.50
8/6/2021	BHC	Email to co-counsel regarding client deposition dates [.1]. Exchanged emails with co-counsel regarding statute of limitations matters [.1].	0.2	\$ 495.00	\$ 99.00
8/11/2021	BHC	Worked on amended Rule 30(b)(6) notice to CDR for service [.1].	0.1	\$ 495.00	\$ 49.50
8/11/2021	BHC	Exchanged emails with co-counsel regarding client deposition scheduling [.2].	0.2	\$ 495.00	\$ 99.00
8/12/2021	BHC	Revised Rule 30(b)(6) notice and approved same for service [.2].	0.2	\$ 495.00	\$ 99.00
8/27/2021	BHC	Exchanged emails with Mr. Fisher regarding remote deposition exhibit protocol [.2].	0.2	\$ 495.00	\$ 99.00
9/5/2021	BHC	Worked on CDR Rule 30(b)(6) outline.	5.9	\$ 495.00	\$ 2,920.50
9/7/2021	BHC	Exchanged emails with staff and co-counsel regarding Rule 30(b)(6) deposition logistics and exhibits [.3]. Exchanged emails with co-counsel regarding deposition outline [.1]; reviewed exhibits in preparation for deposition [.2]. Worked on deposition preparation [1.5].	2.1	\$ 495.00	\$ 1,039.50
9/8/2021	BHC	Prepared for deposition of CDR [.8]. Rule 30(b)(6) deposition of CDR [6.4]; follow up email to court reporter regarding exhibits for same [.1]. Telephone calls with co-counsel regarding Rule 30(b)(6) deposition follow up [.5].	7.8	\$ 495.00	\$ 3,861.00
9/16/2021	BHC	Draft stipulation and proposed order to amend class certification briefing schedule; circulated same to all counsel [1.5]. Discussed strategy with co-counsel [.1].	0.8	\$ 495.00	\$ 396.00
9/17/2021	BHC	Worked on subpoena to Saint Newton [.2].	0.2	\$ 495.00	\$ 99.00
9/20/2021	BHC	Reviewed rule 30(b)(6) transcript regarding IT professionals in order to determine which depositions need to be completed [.3]; approved Newton subpoena for service [.1].	0.4	\$ 495.00	\$ 198.00
10/12/2021	BHC	Worked on motion for class certification.	2	\$ 495.00	\$ 990.00
10/12/2021	BHC	Drafted stipulated motion for overlength brief [.5]; sent same to all counsel [.2]; submitted agreed stipulation and proposed order to Court	0.4	\$ 495.00	\$ 198.00
10/13/2021	BHC	Worked on Plaintiffs' motion for class certification [5.4].	2.7	\$ 495.00	\$ 1,336.50

Date	Initials	Narrative	Units	Rate	Value
10/14/2021	BHC	Drafted proposed order granting motion for class certification [.6]. Email to all counsel regarding confidential materials to be used in support of class certification [.4].	0.5	\$ 495.00	\$ 247.50
10/15/2021	BHC	Telephone conference with Mr. Fisher regarding confidentiality designations [.1].	0.1	\$ 495.00	\$ 49.50
10/15/2021	BHC	Worked on motion for class certification and declarations and exhibits supporting same; reviewed and approved all documents for filing [5.5]. Exchanged emails with all counsel regarding confidentiality designations [.2].	2.8	\$ 495.00	\$ 1,386.00
10/26/2021	BHC	Worked on replies in support of motions to seal or file in open court.	0.3	\$ 495.00	\$ 148.50
11/22/2021	BHC	Read and analyzed CDR response to motion for class certification [.3]; discussed reply brief strategy with co-counsel [.3].	0.6	\$ 495.00	\$ 297.00
11/24/2021	BHC	Video conference with co-counsel regarding replies on class certification [1]. Read first draft of reply in support of class certification [.2].	0.6	\$ 495.00	\$ 297.00
11/29/2021	BHC	Worked on reply in support of certification on CDR classes [1.3].	1.3	\$ 495.00	\$ 643.50
11/29/2021	BHC	Telephone conference with co-counsel regarding legal research related to reply briefs [.2].	0.2	\$ 495.00	\$ 99.00
12/1/2021	BHC	Video conference with co-counsel regarding current drafts and completion of class cert reply briefs [.3]. Worked on reply briefs supporting class certification [6.5].	3.4	\$ 495.00	\$ 1,683.00
12/3/2021	BHC	Worked on replies in support of class certification and declaration and exhibits supporting same; reviewed final versions and approved for filing [5.2].	1.7	\$ 495.00	\$ 841.50
12/17/2021	BHC	Exchanged emails with all counsel regarding hearing date for motion for class certification [.4].	0.2	\$ 495.00	\$ 99.00
1/3/2022	BHC	Email to Judge Galvan's chambers requesting date for class certification hearing [.2].	0.1	\$ 495.00	\$ 49.50
1/14/2022	BHC	Reviewed order on change of judge and exchanged emails with co-counsel regarding same [.2].	0.1	\$ 495.00	\$ 49.50
1/21/2022	BHC	Worked with staff and co-counsel on production of working copies for Judge McCoy [.6].	0.2	\$ 495.00	\$ 99.00
2/2/2022	BHC	Exchanged emails with Ms. Terrell regarding scheduling oral argument on class certification [.2].	0.1	\$ 495.00	\$ 49.50
2/2/2022	BHC	Discussed class certification argument scheduling with Ms. Terrell [.2].	0.1	\$ 495.00	\$ 49.50

Date	Initials	Narrative	Units	Rate	Value
2/21/2022	BHC	Worked on oral argument outline [4.8]. Telephone conference with Ms. Terrell regarding class certification argument outline [.5].	1.7	\$ 495.00	\$ 841.50
2/22/2022	BHC	Email memo to co-counsel regarding class certification hearing preparation [.5]. Class certification preparation meeting with co-counsel [1.1].	0.5	\$ 495.00	\$ 247.50
2/28/2022	BHC	Checked docketing for appeal deadlines related to denial of class certification [.3].	0.1	\$ 495.00	\$ 49.50
3/1/2022	BHC	Read class certification hearing transcript; discussed same with co-counsel [.9].	0.4	\$ 495.00	\$ 198.00
3/2/2022	BHC	Video conference with co-counsel to discuss strategy in light of class certification ruling [.6].	0.3	\$ 495.00	\$ 148.50
4/8/2022	BHC	Worked with staff on filing notice of request for discretionary review [.4].	0.2	\$ 495.00	\$ 99.00
4/14/2022	BHC	Reviewed letter from Court of Appeals regarding perfecting appeal [.2]; email to co-counsel and staff regarding same [.2].	0.2	\$ 495.00	\$ 99.00
4/25/2022	BHC	Reviewed docket; email to all counsel regarding potential motion to stay case schedule; emails to co-counsel regarding same [.3].	0.3	\$ 495.00	\$ 148.50
4/27/2022	BHC	Worked on motion for discretionary review [.7]. Worked on motion to stay [.5].	0.4	\$ 495.00	\$ 198.00
4/29/2022	BHC	Worked on petition for discretionary review [.8]. Exchanged emails with staff regarding filing appendix [.3]. Sent service email to all counsel [.1].	0.4	\$ 495.00	\$ 198.00
5/2/2022	BHC	Worked on motion to stay; email to memo to co-counsel regarding same.	0.1	\$ 495.00	\$ 49.50
5/18/2022	BHC	Exchanged emails with co-counsel and opposing counsel regarding potential stipulation involving Wojdak [.2].	0.2	\$ 495.00	\$ 99.00
5/27/2022	BHC	Exchanged emails with co-counsel and counsel for Wojdak regarding potential stay [.2].	0.2	\$ 495.00	\$ 99.00
6/3/2022	BHC	Exchanged emails with Mr. Fisher regarding stipulation to stay [.1].	0.1	\$ 495.00	\$ 49.50
6/23/2022	BHC	Worked in reply in support of motion for discretionary review [1.5].	0.5	\$ 495.00	\$ 247.50
6/27/2022	BHC	Worked on reply in support of petition for discretionary review [1.1]; reviewed and approved same for filing [.4].	0.5	\$ 495.00	\$ 247.50
8/22/2022	BHC	Revised draft stipulation on case schedule [.2]; discussed same with Ms. Terrell [.2].	0.4	\$ 495.00	\$ 198.00
10/19/2022	BHC	Video conference with co-counsel regarding case management [.6].	0.3	\$ 495.00	\$ 148.50
10/25/2022	BHC	Video conference with co-counsel regarding case management [.5].	0.2	\$ 495.00	\$ 99.00
10/26/2022	BHC	Discussed case management conference with Mr. Leonard [.1].	0.1	\$ 495.00	\$ 49.50
10/27/2022	BHC	Prepared for status conference with Court [.2].	0.1	\$ 495.00	\$ 49.50

Date	Initials	Narrative	Units	Rate	Value
10/28/2022	BHC	Status conference with Court [.2]. Telephone call with Mr. Leonard regarding same [.3].	0.2	\$ 495.00	\$ 99.00
11/14/2022	BHC	Analyzed issues and exchanged emails with co-counsel regarding potential amended complaint and case management [.3].	0.1	\$ 495.00	\$ 49.50
12/5/2022	BHC	Read and analyzed new decision in case against CDR [.3]; telephone call with Mr. Arons regarding same [.2]; telephone call with Mr. Leonard regarding same [.4].	0.9	\$ 495.00	\$ 445.50
2/7/2023	BHC	Video conference with co-counsel regarding discovery matters [.3].	0.1	\$ 495.00	\$ 49.50
3/20/2023	BHC	Video conference with co-counsel regarding case management and discovery progress [.5].	0.2	\$ 495.00	\$ 99.00
3/21/2023	BHC	Worked on motion to compel CDR documents and data [1].	1	\$ 495.00	\$ 495.00
3/22/2023	BHC	Reviewed and approved motion to compel CDR production and related documents for filing [.4].	0.4	\$ 495.00	\$ 198.00
3/28/2023	BHC	Video conference with co-counsel regarding discovery management [1].	0.3	\$ 495.00	\$ 148.50
3/31/2023	BHC	Reviewed reply brief in support of motion to compel re CDR [.2]; telephone conference with co-counsel regarding same [.1].	0.3	\$ 495.00	\$ 148.50
3/31/2023	BHC	Exchanged email with co-counsel regarding incorrect filing [.1]; telephone call with co-counsel regarding same [.1].	0.2	\$ 495.00	\$ 99.00
4/3/2023	BHC	Exchanged emails with co-counsel regarding late filed reply and stipulation [.2].	0.2	\$ 495.00	\$ 99.00
4/5/2023	BHC	Read and analyzed CDR's motion to deny class certification [1].	1	\$ 495.00	\$ 495.00
4/5/2023	BHC	Video conference with co-counsel regarding case management [.6].	0.2	\$ 495.00	\$ 99.00
4/10/2023	BHC	Worked on list of search terms [.2]. Video conference with counsel for CDR regarding compliance with discovery order [.4]; worked with co-counsel on follow up email regarding same [.3].	0.9	\$ 495.00	\$ 445.50
4/11/2023	BHC	Research related to response to CDR's motion to deny class certification [1.5].	1.5	\$ 495.00	\$ 742.50
4/11/2023	BHC	Exchanged emails with defense counsel regarding briefing schedules [.2].	0.1	\$ 495.00	\$ 49.50
4/17/2023	BHC	Worked on motion for leave to amend [1.9]; sent same to co-counsel [.1].	2	\$ 495.00	\$ 990.00
4/18/2023	BHC	Legal research related to CDR's motion for deny class certification [1.2]; email to all counsel regarding same [.2].	1.4	\$ 495.00	\$ 693.00
4/19/2023	BHC	Emails and telephone calls with co-counsel regarding [REDACTED] motion for leave to amend complaint [.4]; multiple emails with co-counsel regarding finishing motion for leave to amend [.4].	0.8	\$ 495.00	\$ 396.00

Date	Initials	Narrative	Units	Rate	Value
4/20/2023	BHC	Worked on motion for leave to amend [.7]. Worked on Fifth Amended Complaint [.7]. Further work on motion for leave to amend [.7].	2.1	\$ 495.00	\$ 1,039.50
4/21/2023	BHC	Worked on motion for leave to amend and supporting documents; reviewed and finalized same for filing [2.2]. Telephone call with Mr. Leonard regarding response to motion to deny class certification [.8].	3	\$ 495.00	\$ 1,485.00
4/25/2023	BHC	Video conference with co-counsel to discuss responses to motion to deny class certification [.6]. Email to staff regarding filing issues [.1]. Worked with Ms. Langsted on data analysis project [.2]. Drafted message to defense counsel regarding requested extension given illness [.5].	1.4	\$ 495.00	\$ 693.00
4/27/2023	BHC	Email to all counsel regarding renoting motions [.2]; reviewed and approved renote for filing [.1].	0.1	\$ 495.00	\$ 49.50
5/9/2023	BHC	Worked on reply in support of motion for leave to amend [2.9].	2.9	\$ 495.00	\$ 1,435.50
5/12/2023	BHC	Worked on response to motion to deny class certification [1.5]; discussed same with Mr. Leonard [.2]; email to Mr. Leonard regarding same [.1].	1.8	\$ 495.00	\$ 891.00
5/22/2023	BHC	Worked with staff to finalize and file Amended Answer and Fifth Amended Counterclaims [.3].	0.3	\$ 495.00	\$ 148.50
5/24/2023	BHC	Worked on response to CDR's motion to deny certification.	2.2	\$ 495.00	\$ 1,089.00
5/25/2023	BHC	Worked on response to CDR's motion to deny certification [2.8]. Telephone calls with Mr. Leonard regarding opposition to CDR's motion to deny class certification [.1]. Worked with staff on exhibits to be filed with oppositions to class certification [.8]. Worked on expert declaration; email to Mr. Dawson regarding same [.5].	4.2	\$ 495.00	\$ 2,079.00
5/26/2023	BHC	Worked on issues related to exhibits to Leonard declaration supporting opposition to motions to deny class certification [.6].	0.6	\$ 495.00	\$ 297.00
5/30/2023	BHC	Worked on response to CDR motion to deny certification; reviewed and approved same for filing [1.8].	1.8	\$ 495.00	\$ 891.00
5/30/2023	BHC	Worked on disclosure of primary witnesses [.3]; exchanged emails with co-counsel regarding same [.1]. Worked on Leonard declaration supporting oppositions to motions to deny certification and exhibits attached to same [2.5].	0.9	\$ 495.00	\$ 445.50
6/2/2023	BHC	Exchanged emails with co-counsel regarding case management and argument prep [.2].	0.1	\$ 495.00	\$ 49.50
6/5/2023	BHC	Analyzed Wojdak declaration filed with reply briefs [.2]. Exchanged emails with co-counsel about to how to address Wojdak statements regarding clients not having paid interest during hearing [.3].	0.5	\$ 495.00	\$ 247.50

Date	Initials	Narrative	Units	Rate	Value
6/9/2023	BHC	Hearing on motions to deny class certification [2]; follow up discussion with co-counsel regarding same [1]. Travel from hearing to office [.4].	1.7	\$ 495.00	\$ 841.50
6/12/2023	BHC	Drafted proposed order denying CDR motion to dismiss [2.5].	2.5	\$ 495.00	\$ 1,237.50
6/13/2023	BHC	Revised proposed findings of fact and conclusions of law in proposed orders denying motions to deny class certification [1]. Worked on further revisions to proposed orders [.8]; emailed same to Court [.1].	0.6	\$ 495.00	\$ 297.00
6/23/2023	BHC	Video conference with co-counsel regarding case management and strategy in light of orders on motions to deny certification [1.2].	0.4	\$ 495.00	\$ 198.00
6/27/2023	BHC	Email to Mr. Hasson regarding discovery requests to named plaintiffs [.1].	0.1	\$ 495.00	\$ 49.50
6/27/2023	BHC	Worked with Ms. Nuss on data analysis issues [.3]; email to co-counsel proposing settlement demand [.2].	0.5	\$ 495.00	\$ 247.50
6/29/2023	BHC	Exchanged emails with co-counsel regarding class certification discovery and settlement offer [.2]. Finalized settlement offer letter and sent same to defense counsel [.3].	0.5	\$ 495.00	\$ 247.50
6/30/2023	BHC	Exchanged numerous emails and telephone calls with co-counsel and defense counsel regarding settlement demand to CDR [.6].	0.6	\$ 495.00	\$ 297.00
7/10/2023	BHC	Drafted stipulation regarding stay pending settlement negotiations.	0.7	\$ 495.00	\$ 346.50
7/10/2023	BHC	Prepared for conference regarding settlement with defense counsel [.2]; meeting with co-counsel regarding ER 408 conference [.5]. Video conference with defense counsel regarding settlement discussions [.7].	1.4	\$ 495.00	\$ 693.00
7/13/2023	BHC	Worked on data analysis [.4]; video conference with co-counsel regarding same [1.1]. Email to staff regarding time records analysis [.2].	1.7	\$ 495.00	\$ 841.50
7/19/2023	BHC	Telephone call from Mr. Hasson regarding CDR's position on case schedule [.2]; read follow up email regarding same [.1].	0.3	\$ 495.00	\$ 148.50
7/19/2023	BHC	Worked on proposed settlement agreement with CDR and sent same to co-counsel with proposed counter to CDR's settlement offer [3.8].	3.8	\$ 495.00	\$ 1,881.00
7/20/2023	BHC	Revised draft settlement agreement and counteroffer; sent same to Mr. Hasson [.6]. Revised and approved proposed message to defense counsel regarding mutual release for Ms. Ancheta [.1].	0.7	\$ 495.00	\$ 346.50
7/31/2023	BHC	Drafted response to CDR's offer; sent same to co-counsel for approval [.3]; sent same to Mr. Hasson [.1]. Email to co-counsel regarding requested extension of due date for brief; reviewed notation order granting same	0.5	\$ 495.00	\$ 247.50
8/1/2023	BHC	Drafted settlement communication to Mr. Hasson; sent to co-counsel for review; sent same to Mr. Hasson [.6]; exchanged emails with Ms. Terrell regarding same [.1].	0.7	\$ 495.00	\$ 346.50

Date	Initials	Narrative	Units	Rate	Value
8/3/2023	BHC	Email to Mr. Hasson regarding proposed settlement class definition [.4].	0.4	\$ 495.00	\$ 198.00
8/10/2023	BHC	Drafted settlement communication to Mr. Hasson regarding CDR claims and sent same to co-counsel for approval [.5].	0.5	\$ 495.00	\$ 247.50
8/11/2023	BHC	Telephone call from Mr. Arons regarding client approval of rejection of CDR offer [.1]. Email to Mr. Hasson conveying rejection of CDR offer and counter demand [.1].	0.2	\$ 495.00	\$ 99.00
8/17/2023	BHC	Worked on redlined settlement agreement [.6]; wrote settlement offer response to Mr. Hasson [.4].	1	\$ 495.00	\$ 495.00
8/18/2023	BHC	Analyzed settlement communication from CDR regarding scope of release; drafted email response to same [.4]; revised same in light of comments from co-counsel and sent to Mr. Hasson [.2].	0.6	\$ 495.00	\$ 297.00
8/21/2023	BHC	Worked on CDR settlement agreement; sent same to co-counsel for review and approval [.5]. Drafted email message to defense counsel regarding revisions to settlement agreement [.5]; sent directions to co-counsel to send same [.1].	1.1	\$ 495.00	\$ 544.50
8/22/2023	BHC	Email to notice provider requesting bid [.7].	0.7	\$ 495.00	\$ 346.50
8/24/2023	BHC	Worked on CDR settlement notices [2.1]. Exchanged emails with administrator regarding bid request [.2].	2.3	\$ 495.00	\$ 1,138.50
8/25/2023	BHC	Reviewed final version of settlement agreement from counsel for CDR; sent same to filing [.3].	0.3	\$ 495.00	\$ 148.50
9/5/2023	BHC	Email to co-counsel regarding drafting preliminary and final approval orders and motion [.2].	0.2	\$ 495.00	\$ 99.00
9/11/2023	BHC	Drafted and sent request for proposal email to settlement administrations for CDR settlement [.4]. Revised preliminary and final approval orders as exhibits to CDR settlement [1.1]. Responded to email inquiry from CPT Group regarding scope of administration [.1].	1.6	\$ 495.00	\$ 792.00
9/12/2023	BHC	Email to Mr. Drachler providing background information for drafting motion for preliminary approval of CDR settlement [.5]. Worked on preliminary and final approval orders and sent same to counsel for CDR [.3]. Emails to potential administrators regarding CDR settlement [.2].	1	\$ 495.00	\$ 495.00
9/15/2023	BHC	Revised CDR settlement agreement to reflect administrator and revised notices; sent same to all counsel [.6].	0.6	\$ 495.00	\$ 297.00
9/25/2023	BHC	Worked on settlement agreement and exhibits; sent same to staff to finalize [.9].	0.9	\$ 495.00	\$ 445.50
9/26/2023	BHC	Revised settlement agreement section cross references [.3].	0.3	\$ 495.00	\$ 148.50

Date	Initials	Narrative	Units	Rate	Value
9/29/2023	BHC	Exchanged emails with Mr. Hasson regarding CDR settlement [.1].	0.1	\$ 495.00	\$ 49.50
10/5/2023	BHC	Telephone call to client Mosley regarding signature on settlement agreement [.1]. Reviewed all signatures and sent signed agreement to defense counsel [.2].	0.3	\$ 495.00	\$ 148.50
10/6/2023	BHC	Worked on motion for preliminary approval and declaration supporting same.	2	\$ 495.00	\$ 990.00
10/9/2023	BHC	Drafted Mr. Arons notice of unavailability; approved same for filing [.2]. Final review of motion for preliminary approval and supporting documents for filing [.5].	0.7	\$ 495.00	\$ 346.50
10/25/2023	BHC	Reviewed order granting preliminary approval [.2].	0.2	\$ 495.00	\$ 99.00
		Statement Professional: Blythe Chandler	125.5		\$ 62,122.50
11/2/2020	BKK	Prepared draft and finalized Defendant's answer and counterclaims [1.1]; prepared draft of petition to remove to superior court [.5].	0.8	\$ 125.00	\$ 100.00
11/3/2020	BKK	Reviewed, revised and finalized petition to remove to superior court [.2].	0.1	\$ 125.00	\$ 12.50
		Statement Professional: Bradford Kinsey	0.9		\$ 112.50
11/29/2021	EAA	Personal conference regarding research issues for class certification replies [0.2]; worked on research issues [3.4].	3.6	\$ 425.00	\$ 1,530.00
11/30/2021	EAA	Completed research regarding [REDACTED] for reply briefs in support of class certification [1.8]; email correspondence regarding same [0.2].	2	\$ 425.00	\$ 850.00
12/1/2021	EAA	Worked on drafting and revising replies in support of class certification [3.8]; personal conferences regarding same [0.6].	2.2	\$ 425.00	\$ 935.00
5/10/2022	EAA	Email correspondence regarding reply in support of motion to stay.	0.3	\$ 425.00	\$ 127.50
6/13/2022	EAA	Drafted stipulation to extend deadline for filing replies in support of motion for discretionary review [0.6]; email and phone correspondence regarding same [0.3].	0.3	\$ 425.00	\$ 127.50
6/14/2022	EAA	Email correspondence regarding stipulation to extend deadline to file replies in support of motion for discretionary review [0.3]; approved final for filing of same [0.1].	0.1	\$ 425.00	\$ 42.50
		Statement Professional: Elizabeth Adams	8.5		\$ 3,612.50
11/6/2020	EBN	Worked on petition for removal and exhibits to same.	1	\$ 200.00	\$ 200.00
		Statement Professional: Eden Nordby	1		\$ 200.00

Date	Initials	Narrative	Units	Rate	Value
5/6/2021	ET	Downloaded and organized client's emails [3]	3	\$ 125.00	\$ 375.00
6/22/2021	ET	Reviewed production for personal information to redact [0.5]	0.5	\$ 125.00	\$ 62.50
1/21/2022	ET	Created binders of working copies for judge, and arranged for delivery to court on Monday [3.5]	1.2	\$ 125.00	\$ 150.00
		Statement Professional: Eva Thomas	4.7		\$ 587.50
10/14/2021	HB	Worked on declaration and exhibits in support of motion for class certification [8.2].	4.1	\$ 150.00	\$ 615.00
10/18/2021	HB	Prepared sealed documents for delivery to the Judge's Mailroom [.7].	0.3	\$ 150.00	\$ 45.00
12/2/2021	HB	Worked on declaration and exhibits in support of class cert reply [2.0].	0.7	\$ 150.00	\$ 105.00
12/3/2021	HB	Worked on finalizing declaration, exhibits, and other supporting documents for class cert reply [.4].	0.1	\$ 150.00	\$ 15.00
2/22/2022	HB	Gathered documents for class certification preparation [.2].	0.1	\$ 150.00	\$ 15.00
4/26/2023	HB	Prepared a re-notice of hearing for motion for leave to amend [.4].	0.4	\$ 150.00	\$ 60.00
5/25/2023	HB	Worked on exhibits in support of responses to motion to decertify and motion to strike [1.0].	1	\$ 150.00	\$ 150.00
5/26/2023	HB	Worked on Declaration and exhibits in support of response to motions to decertify and strike [4.6].	1.5	\$ 150.00	\$ 225.00
5/30/2023	HB	Worked on declaration, exhibits, and index of non-Washington authorities in support of responses to motions to decertify and strike [3.5].	1.2	\$ 150.00	\$ 180.00
		Statement Professional: Heather Brown	9.4		\$ 1,410.00
11/20/2020	HMR	Worked on and finalized notice of appearance, declaration of service, note for motion, defendants' motion to change judge, proposed order and declaration of service; electronically filed same; emailed same to counsel for plaintiff.	0.5	\$ 125.00	\$ 62.50
3/24/2021	HMR	Worked on defendants' first set of interrogatories and requests for production of documents to third-party defendant William Wojdak.	0.3	\$ 125.00	\$ 37.50
4/29/2021	HMR	Submitted motion to voluntarily dismiss third-party defendant Jose Salas via ex parte twice.	0.5	\$ 125.00	\$ 62.50
4/30/2021	HMR	Worked on defendants' second set of interrogatories and requests for production of documents to Columbia Debt Recovery and Thrive Communities Management, LLC and Thrive Communities, Inc. [.6]; updated master caption [.1].	0.3	\$ 125.00	\$ 37.50

Date	Initials	Narrative	Units	Rate	Value
5/26/2021	HMR	Worked on and finalized letter to Brad Fisher regarding discovery; emailed same to counsel and co-counsel.	0.4	\$ 125.00	\$ 50.00
6/7/2021	HMR	Worked on and finalized defendants' disclosures of possible primary witnesses and declaration of service; emailed same to counsel for all parties [.6]; updated master caption and declaration of service [.3]	0.4	\$ 125.00	\$ 50.00
6/11/2021	HMR	Worked on declaration of Blythe H. Chandler in support of motion for leave to amend answer.	0.1	\$ 125.00	\$ 12.50
9/16/2021	HMR	Worked on plaintiffs' motion for class certification, declaration of Blythe H. Chandler, proposed order granting same [.5]; worked on stipulated motion to amend case schedule and proposed order [.3].	0.4	\$ 125.00	\$ 50.00
12/3/2021	HMR	Worked on and finalized reply to defendant Belkorp Holdings, Inc's opposition to motion for class certification, reply to defendant Thrive Communities' Management, LLC's opposition to motion for class certification, reply to plaintiffs' Columbia Debt Recovery and William Wojdak's opposition to motion for class certification, supplemental declaration of Blythe H. Chandler, index of non-Washington authorities cited in reply (2), proposed order, declaration of service; electronically filed same; submitted judges' working copies.	0.7	\$ 125.00	\$ 87.50
		Statement Professional: Holly Rota	3.6		\$ 450.00
8/5/2021	JAL	Worked on drafting deposition notice [1.1].	1.1	\$ 150.00	\$ 165.00
9/17/2021	JAL	Worked on drafting deposition subpoena [1.6].	1.6	\$ 150.00	\$ 240.00
9/20/2021	JAL	Worked on drafting and serving subpoena [1.9].	1.9	\$ 150.00	\$ 285.00
9/21/2021	JAL	Worked on loading production [0.9].	0.9	\$ 150.00	\$ 135.00
4/29/2022	JAL	Worked on appendix index [2.1].	0.7	\$ 150.00	\$ 105.00
		Statement Professional: Jessica Langstead	6.2		\$ 930.00
9/7/2021	JJB	Worked on deposition preparation.	1.7	\$ 175.00	\$ 297.50
9/8/2021	JJB	Telephone conferences regarding deposition exhibits; prepared deposition exhibits.	0.5	\$ 175.00	\$ 87.50
		Statement Professional: Jennifer Boschen	2.2		\$ 385.00
5/19/2021	JN	Reviewed email regarding production of client documents and prepared response to same.[.1]	0.1	\$ 195.00	\$ 19.50

Date	Initials	Narrative	Units	Rate	Value
5/27/2021	JN	Reviewed email from Mr. Fisher regarding meet and confer and responses to same.[.1]	0.1	\$ 195.00	\$ 19.50
5/28/2021	JN	Reviewed email from Mr. Fisher regarding plaintiffs' depositions and response to same.[.1];	0.1	\$ 195.00	\$ 19.50
5/28/2021	JN	Reviewed emails regarding review of client emails and responses to same.[.1].	0.1	\$ 195.00	\$ 19.50
8/27/2021	JN	Reviewed emails from Mr. Fisher regarding presentation of exhibits and prepared emails regarding same.[.1]; Created case and depositions in Agile.[.2]; Prepared email to all counsel enclosing instructions for testing of Agile platform.[.1]	0.4	\$ 195.00	\$ 78.00
4/27/2022	JN	Worked on clerk's papers for motion for discretionary review.[.4]	0.1	\$ 195.00	\$ 19.50
4/28/2022	JN	Worked on motion for discretionary review[2]	0.7	\$ 195.00	\$ 136.50
4/28/2022	JN	Continued working on appendix to motion for discretionary review	0.9	\$ 195.00	\$ 175.50
6/27/2023	JN	Worked on data analysis.[.5]	0.5	\$ 195.00	\$ 97.50
10/26/2023	JN	Worked on plans for preparation of data for settlement administrator.[.2]	0.2	\$ 195.00	\$ 39.00
10/30/2023	JN	Worked on data analysis and output.[.8];	0.8	\$ 195.00	\$ 156.00
10/31/2023	JN	Worked on revisions to/upload of notices, data, and settlement agreement.[.3];	0.3	\$ 195.00	\$ 58.50
		Statement Professional: Jodi Nuss	4.3		\$ 838.50
3/15/2023	JR	Met and conferred with CDR regarding discovery requests [.4]; drafted and revised summary of meet and confer to send to CDR [.6].	1	\$ 275.00	\$ 275.00
3/22/2023	JR	Revised Plaintiff's Motion to Compel CDR to produce further discovery [1.5]; worked on case management regarding filing motion to compel [.2].	1.7	\$ 275.00	\$ 467.50
3/28/2023	JR	Case management and strategy conference with co-counsel [1.1].	0.4	\$ 275.00	\$ 110.00
		Statement Professional: Jasmin Rezaie	3.1		\$ 852.50
4/26/2021	SS	Reviewed and analyzed Complaint.	0.4	\$ 325.00	\$ 130.00
4/28/2021	SS	Reviewed and analyzed letter from opposing counsel on discovery from CDR.	0.3	\$ 325.00	\$ 97.50
4/28/2021	SS	Reviewed first set of interrogatories and requests for production and plaintiff Columbia Debt Recovery's objections and responses.	0.6	\$ 325.00	\$ 195.00
4/28/2021	SS	Reviewed cases cited by opposing counsel in discovery letter.	0.9	\$ 325.00	\$ 292.50
4/28/2021	SS	Commenced research on pre certification discovery requests.	0.4	\$ 325.00	\$ 130.00

Date	Initials	Narrative	Units	Rate	Value
4/28/2021	SS	Drafted email regarding research question and scope of discovery letter; [REDACTED]	0.3	\$ 325.00	\$ 97.50
4/28/2021	SS	Researched issue of pre certification discovery in Washington state courts.	1	\$ 325.00	\$ 325.00
4/28/2021	SS	Commenced drafting letter in response to opposing counsel regarding discovery RFPs No. 3, 4, 5, and 12.	0.4	\$ 325.00	\$ 130.00
4/28/2021	SS	Reviewed Answer and Counterclaims to determine relevant class definitions.	0.2	\$ 325.00	\$ 65.00
4/29/2021	SS	Drafted letter to opposing counsel regarding RFPs No. 3, 4, 5, and 12.	0.5	\$ 325.00	\$ 162.50
4/29/2021	SS	Edited draft letter to opposing counsel on RFPs 3, 4, 5, and 12.	0.3	\$ 325.00	\$ 97.50
4/29/2021	SS	Drafted email to partner sending draft letter re discovery.	0.2	\$ 325.00	\$ 65.00
5/3/2021	SS	Reviewed CDR's responses to first set of interrogatories and requests for production.	0.5	\$ 325.00	\$ 162.50
5/7/2021	SS	Edited draft discovery letter to CDR.	0.5	\$ 325.00	\$ 162.50
5/7/2021	SS	Reviewed draft discovery correspondence and new requests for production to prepare for meeting.	0.6	\$ 325.00	\$ 195.00
5/7/2021	SS	Video conference regarding draft discovery letters, draft requests for production.	0.5	\$ 325.00	\$ 162.50
5/10/2021	SS	Reviewed discovery produced by CDR.	0.8	\$ 325.00	\$ 260.00
5/11/2021	SS	Commenced reviewing disclosures by Columbia Debt Recovery - CollectOne handbook.	0.5	\$ 325.00	\$ 162.50
5/19/2021	SS	Finalized discovery letter to CDR; emailed same for sending.	0.3	\$ 325.00	\$ 97.50
5/19/2021	SS	Reviewed suggested edits to discovery letter to CDR.	0.3	\$ 325.00	\$ 97.50
5/19/2021	SS	Reviewed edits to discovery letter to CDR [.2].	0.2	\$ 325.00	\$ 65.00
5/19/2021	SS	Edited discovery letter to CDR to include request for communications between it and Thrive.	0.2	\$ 325.00	\$ 65.00
5/19/2021	SS	Video conference with counsel on case strategy and outstanding discovery.	0.3	\$ 325.00	\$ 97.50
5/20/2021	SS	Reviewed suggested edits to discovery letter to CDR from co-counsel.	0.5	\$ 325.00	\$ 162.50
5/20/2021	SS	Finalized edits to discovery letter to CDR.	0.3	\$ 325.00	\$ 97.50
5/20/2021	SS	Reviewed and finalized discovery letters to BelKorp and CDR.	0.1	\$ 325.00	\$ 32.50
5/26/2021	SS	Reviewed discovery letters in preparation for conferences.	0.3	\$ 325.00	\$ 97.50
5/27/2021	SS	Prepared for discovery conference with CDR.	0.5	\$ 325.00	\$ 162.50
5/27/2021	SS	Discovery conference with Mr. Fisher on Columbia Debt Recovery's discovery responses.	0.9	\$ 325.00	\$ 292.50
5/27/2021	SS	Video conference with co-counsel to debrief on discovery call with Columbia Debt Recovery.	0.5	\$ 325.00	\$ 162.50

Date	Initials	Narrative	Units	Rate	Value
5/28/2021	SS	Email to Mr. Fisher on Columbia Debt Recovery discovery call.	0.9	\$ 325.00	\$ 292.50
5/28/2021	SS	Incorporated suggestions into email to Brad Fisher on discovery call.	0.4	\$ 325.00	\$ 130.00
5/28/2021	SS	Incorporated edits into email to Brad Fisher on discovery call.	0.2	\$ 325.00	\$ 65.00
5/28/2021	SS	Finalized emails and circulated for review.	0.2	\$ 325.00	\$ 65.00
6/2/2021	SS	Reviewed letter from OC on discovery conference and disputes.	0.3	\$ 325.00	\$ 97.50
6/3/2021	SS	Reviewed and analyzed letter from opposing counsel following up on discovery call.	0.3	\$ 325.00	\$ 97.50
6/3/2021	SS	Reviewed draft email from co-counsel.	0.3	\$ 325.00	\$ 97.50
6/7/2021	SS	Searched iPro for contact information for witness disclosure [.4]; edited witness disclosure to update contact information and expert witness type [.4]; reviewed and approved final document [.2].	0.5	\$ 325.00	\$ 162.50
6/9/2021	SS	Video conference with co-counsel.	0.4	\$ 325.00	\$ 130.00
6/10/2021	SS	Researched futility standard for motions to amend [1]; edited motion to amend [.6].	0.8	\$ 325.00	\$ 260.00
6/10/2021	SS	Reviewed Answer and Counterclaim Defendants' Answers [.6]; motion to amend [1.4].	1	\$ 325.00	\$ 325.00
6/11/2021	SS	Research on futility standard for motion to amend [.5]; motion to amend drafting [.5].	0.5	\$ 325.00	\$ 162.50
6/14/2021	SS	Incorporated edits into motion to amend.	0.2	\$ 325.00	\$ 65.00
6/17/2021	SS	Motion to amend case schedule [.7]; declaration in support of motion to amend case schedule [.2]; reviewed and incorporated edits to discovery requests [.4].	0.6	\$ 325.00	\$ 195.00
6/22/2021	SS	Email to co-counsel regarding supplemental discovery [.3]; email to co-counsel regarding motion to amend case schedule [.2].	0.2	\$ 325.00	\$ 65.00
6/23/2021	SS	Email to opposing counsel on proposed dates for case schedule and class certification briefing [.3]; circulated draft motion to amend complaint to co-counsel [.2]; reviewed and analyzed discovery letter from opposing counsel [.2].	0.4	\$ 325.00	\$ 130.00
6/29/2021	SS	Edited motion to amend case schedule.	0.3	\$ 325.00	\$ 97.50
6/30/2021	SS	Edited draft motion to amend case schedule [1.4]; email circulating draft motion to amend [.1].	0.7	\$ 325.00	\$ 227.50

Date	Initials	Narrative	Units	Rate	Value
7/2/2021	SS	Email to opposing counsel on proposed amended Answer/Counterclaims and proposed stipulated motion to amend case schedule [.3]; reviewed email response to opposing counsel on amended answer and counterclaims [.2]; final review of motion to amend case schedule and accompanying documents [.2]; reviewed and incorporated edits to motion to amend answer [.7].	0.7	\$ 325.00	\$ 227.50
8/10/2021	SS	Revised requests for admissions from co-counsel [.9]; final review of requests for production and interrogatories [.2]; email circulating ROGs and RFPs to co-counsel [.1].	1.2	\$ 325.00	\$ 390.00
8/11/2021	SS	Reviewed draft requests for admission [.2]; email circulating draft for review [.1]; reviewed edit to draft requests for admission [.1]; email circulating draft requests for admission [.1]; telephone call on edits from co-counsel to discovery requests [.2]; edited discovery requests accordingly [.1]; reviewed final copies of discovery requests and deposition notice before service [.2]; email to docket requests on discovery requests	1.1	\$ 325.00	\$ 357.50
8/20/2021	SS	Reviewed Columbia Debt Recovery's objections to 30(b)(6) deposition notice topics [.2].	0.2	\$ 325.00	\$ 65.00
9/8/2021	SS	Observed Rule 30(b)(6) deposition of Columbia Debt Recovery [1.5]; continued observing Rule 30(b)(6) deposition of Columbia Debt Recovery [1.2]; continued observing Rule 30(b)(6) deposition of Columbia Debt Recovery [.3].	3	\$ 325.00	\$ 975.00
9/9/2021	SS	Video conference with co-counsel following 30(b)(6) deposition [.6].	0.6	\$ 325.00	\$ 195.00
10/4/2021	SS	Reviewed letter from counsel for Saint Newton [.1].	0.1	\$ 325.00	\$ 32.50
10/22/2021	SS	Reviewed responses to motion to seal and related documents [1]; reviewed proposed discovery requests [.2].	0.6	\$ 325.00	\$ 195.00
10/25/2021	SS	Reply to Columbia Debt Recovery motion to seal exhibits ISO motion for class certification.	2	\$ 325.00	\$ 650.00
10/25/2021	SS	Reviewed and analyzed responses to motion to seal [1]; researched case-law on motions to seal [1].	1	\$ 325.00	\$ 325.00
10/26/2021	SS	Proofread replies.	0.3	\$ 325.00	\$ 97.50
11/12/2021	SS	Reviewed responses to class certification motion.	1	\$ 325.00	\$ 325.00
11/15/2021	SS	Outlined potential evidentiary and legal arguments for reply to CDR response to class cert motion.	1	\$ 325.00	\$ 325.00
11/16/2021	SS	Email summarizing potential arguments for replies ISO motion for class certification.	0.5	\$ 325.00	\$ 162.50

Date	Initials	Narrative	Units	Rate	Value
11/17/2021	SS	Reviewed CDR response brief [.5]; outlined reply to CDR [1.7].	2.3	\$ 325.00	\$ 747.50
11/18/2021	SS	Research for reply to CDR response to class certification [2.1]; outlined reply [.5].	2.6	\$ 325.00	\$ 845.00
11/18/2021	SS	Outlined reply to CDR response to motion for class certification [.7]; commenced drafting reply [.4].	1.1	\$ 325.00	\$ 357.50
11/18/2021	SS	Reply to CDR response to class certification.	0.5	\$ 325.00	\$ 162.50
11/18/2021	SS	Reply to CDR opposition to class certification.	0.8	\$ 325.00	\$ 260.00
11/19/2021	SS	Reply to CDR opposition to motion for class certification.	1.7	\$ 325.00	\$ 552.50
11/22/2021	SS	CDR reply brief.	1.5	\$ 325.00	\$ 487.50
11/22/2021	SS	Drafted notes in preparation for reply strategy call [.3]; video conference re reply strategy [.3]; emails re scheduling team strategy video conference	0.3	\$ 325.00	\$ 97.50
11/23/2021	SS	CDR reply brief in support of class certification [4.3].	4.3	\$ 325.00	\$ 1,397.50
11/24/2021	SS	Reply to CDR opposition to class certification.	1.5	\$ 325.00	\$ 487.50
11/24/2021	SS	Video conference with co-counsel on class cert reply strategy.	0.4	\$ 325.00	\$ 130.00
11/29/2021	SS	Reviewed and incorporated edits to CDR reply.	1.4	\$ 325.00	\$ 455.00
11/30/2021	SS	Edits to CDR reply.	0.7	\$ 325.00	\$ 227.50
11/30/2021	SS	CDR reply brief.	1.8	\$ 325.00	\$ 585.00
11/30/2021	SS	CDR reply brief.	0.7	\$ 325.00	\$ 227.50
12/1/2021	SS	CDR reply brief.	1	\$ 325.00	\$ 325.00
2/23/2022	SS	Case summaries for oral argument prep.	1.1	\$ 325.00	\$ 357.50
3/1/2022	SS	Reviewed and analyzed transcript of class certification hearing.	0.4	\$ 325.00	\$ 130.00
4/25/2022	SS	Drafted introduction, facts section of motion to stay.	1.3	\$ 325.00	\$ 422.50
4/25/2022	SS	Researched standard of review for motion to stay pending appeal.	1.2	\$ 325.00	\$ 390.00
4/25/2022	SS	Motion to stay pending resolution of motion for discretionary review argument section.	1.3	\$ 325.00	\$ 422.50
4/27/2022	SS	Motion to stay.	0.5	\$ 325.00	\$ 162.50
4/27/2022	SS	Declaration in support of motion to stay.	0.3	\$ 325.00	\$ 97.50
5/9/2022	SS	Reviewed Court orders on motions for extension of time to respond [.2]; emails to docketing and filing re same [.2].	0.2	\$ 325.00	\$ 65.00
5/9/2022	SS	Reviewed opposition to motion to stay [.3]; Reviewed sample briefing on issue of individual liability for motion to stay reply [.8].	0.4	\$ 325.00	\$ 130.00
5/10/2022	SS	Continued review of sample briefing on issue of individual liability in FDCPA, CPA claims.	0.3	\$ 325.00	\$ 97.50
5/10/2022	SS	Reviewed sample briefing on individual liability [.6]; reviewed case-law for reply ISO motion to stay [.7].	1.3	\$ 325.00	\$ 422.50

Date	Initials	Narrative	Units	Rate	Value
5/11/2022	SS	Edited reply ISO motion to stay pending resolution of motion for discretionary review.	1.3	\$ 325.00	\$ 422.50
6/6/2022	SS	Reviewed and revised stipulation and filing documents [.1]; email re same [.1]; email re same to B. Fisher [.1].	0.3	\$ 325.00	\$ 97.50
6/6/2022	SS	Stipulation re stay of proceedings against William Wojdak pending resolution of motion for discretionary review.	0.5	\$ 325.00	\$ 162.50
6/13/2022	SS	Email to B. Fisher re stip.	0.2	\$ 325.00	\$ 65.00
6/13/2022	SS	Reviewed redlines to stipulation from B. Fisher [.1]; email re same [.1]; email re same to opposing counsel [.1].	0.3	\$ 325.00	\$ 97.50
6/13/2022	SS	Created clean copies of stip and proposed order [.1]; reviewed and approved finals for filing [.2].	0.3	\$ 325.00	\$ 97.50
6/27/2022	SS	Reviewed final reply iso motion for discretionary review.	0.2	\$ 325.00	\$ 65.00
8/19/2022	SS	Stipulation extending stay pending resolution of mtn for discretionary review.	0.7	\$ 325.00	\$ 227.50
8/22/2022	SS	Accepted revisions to draft stipulation [.2]; amended proposed order re same [.2]; email circulating same [.1]; revised stip and proposed order with new dates [.1]; email circulating updated stips [.1].	0.7	\$ 325.00	\$ 227.50
8/23/2022	SS	Email recirculating original stipulation [.2]; updated stipulation and proposed order re same [.2].	0.4	\$ 325.00	\$ 130.00
		Statement Professional: Sara Smith	70.6		\$ 22,945.00
3/24/2021	TS	Worked on Defs' 1st set of ROGs to 3rd party def William Wojdak [.5]; defs' 1st set of RFPs to 3rd party def William Wojdak [.5].	1	\$ 125.00	\$ 125.00
3/29/2021	TS	Worked on notice of Rule 30(b)(6) deposition to Columbia Debt Recovery.	0.5	\$ 125.00	\$ 62.50
5/19/2021	TS	Finalized ltr to B. Fisher [.2].	0.2	\$ 125.00	\$ 25.00
5/20/2021	TS	Finalized ltr. to B. Fisher [.1].	0.1	\$ 125.00	\$ 12.50
		Statement Professional: Tanya Stewart	1.8		\$ 225.00
		Total	314.9		\$ 132,926.00

Exhibit 2

THE HONORABLE JAMES L. ROBERT

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ADAMA JAMMEH, OUMIE SALLAH, and
CYNTHIA QUINTERO,

Plaintiffs,

v.

HNN ASSOCIATES, LLC, GATEWAY, LLC,
COLUMBIA DEBT RECOVERY, LLC, d/b/a
GENESIS CREDIT MANAGEMENT, LLC, and
WILLIAM WOJDAK,

Defendants.

NO. 2:19-cv-00620-JLR

[PROPOSED] FINAL APPROVAL ORDER

This matter came before the Court on consideration of Plaintiffs’ Motion for Final Approval of Class Action Settlement (Dkt. # 128) and Class Counsel’s Motion for an Award of Fees, Costs, and Class Representative Statutory and Service Awards (Dkt. # 121). After considering the motions and the declarations and exhibits submitted with the motions, the Court enters this Final Approval Order (“Final Approval Order”), which constitutes a final adjudication on the merits of all claims of the Classes and Subclass. It is HEREBY ORDERED that the motions are GRANTED, the Settlement Agreement and Release (“Agreement”) is finally approved, Class Counsel are awarded \$600,000 in fees and expenses, Plaintiffs Adama Jammeh and Oumie Sallah are each awarded \$5,000 for statutory damages and service awards, and Plaintiff Cynthia Quintero is awarded \$2,000 for a statutory damages and service award.

1 On February 4, 2021, the Court preliminarily approved the Agreement and directed that
2 notice be given to the Class (Dkt. No. 120). Pursuant to the notice requirements set forth in the
3 Agreement and Preliminary Approval Order, Class Members were notified of the terms of the
4 proposed Agreement, of their right to opt out, and of their right to object and be heard at a
5 Final Approval Hearing to determine whether the terms and conditions of the Agreement are
6 fair, reasonable, and adequate for the release of the claims contemplated by the Agreement;
7 and whether judgment should be entered dismissing this action with prejudice.

8 The Court has reviewed and considered all papers filed in support of and in opposition
9 to the settlement, and all exhibits thereto, and held a hearing after notice was sent to the
10 Classes in order to confirm that the settlement is fair, reasonable, and adequate, and to
11 determine whether the Final Approval Order should be entered in this action pursuant to the
12 terms and conditions set forth in the Agreement (“Final Approval Hearing”) on June 9, 2021 at
13 9:00 a.m. At the Final Approval Hearing, the parties and all interested persons were heard in
14 support of and in opposition to the settlement.

15 NOW, THEREFORE, IT IS HEREBY ORDERED:

16 1. The Court has jurisdiction over the subject matter of this action and personal
17 jurisdiction over the parties and the Classes. The definitions and provisions of the Agreement
18 are incorporated in this Order as though fully set forth herein.

19 2. In its class certification order, the Court certified the following Classes:

20 **HNN CLASSES:** Former tenants of an HNN managed property in
21 Washington who moved in before February 1, 2019 and:

22 (1) who moved out on or after July 12, 2017, and from whom HNN
23 collected a deposit or security without providing a move-in
24 checklist that stated the condition of the walls, floors, countertops,
25 carpets, and appliances in the unit (the “Move-In Form” Class); or

26 (2) who moved out on or after July 12, 2017, and to whom HNN
27 mailed a statement of HNN’s basis for retaining a deposit more
than 21-days after the tenant moved out of an HNN-managed unit
(the “Late Statement” Class); or

1 (3) who moved in to an HNN managed property after July 31, 2016,
2 and whose deposit was forfeited by HNN (the “Forfeiture Class”).

3 **CDR CLASS:** All former tenants of an HNN managed property in
4 Washington whose accounts HNN placed with CDR between
5 February 13, 2017 and January 31, 2019, and to whom CDR sent at
6 least one written collection demand.

7 Dkt. No. 105 at 57. In its Preliminary Approval Order, the Court also found that the FDCPA
8 Subclass satisfies the requirements of Rule 23(a) and (b)(3) and certified the following Subclass:

9 **CDR FDCPA SUBCLASS:** All members of the CDR Class to whom CDR
10 sent at least one written collection demand on or after July 12,
11 2018.

12 Dkt. No. 120

13 3. The Court reaffirms its appointment of Adama Jammeh, Oumie Sallah, and
14 Cynthia Quintero as Class Representatives (Dkt. Nos. 105 at 58, 120 at 3), and the Terrell
15 Marshall Law Group, The Law Office of Paul Arons, and Leonard Law, as Class Counsel (*id.*).

16 4. The Court finds that the notice given to Class Members fully and accurately
17 informed Class Members of all material elements of the settlement and constituted valid,
18 sufficient, and due notice to all Class Members. The notice fully complied with due process,
19 Rule 23 of the Federal Rules of Civil Procedure, and all other applicable law.

20 5. The settlement requires Defendants to establish a Settlement Fund in the
21 amount of \$1,600,000 that the parties propose to use to: make payments to all Settlement
22 Class Members with a deliverable address who did not timely exclude themselves from the
23 settlement; pay the Class Administrator the costs of notice and settlement administration
24 expenses; pay statutory damages and service awards to the Class Representatives in amounts
25 approved by the Court; and pay Class Counsel’s attorneys’ fees and expenses, in amounts
26 approved by the Court. The Settlement Fund is non-reversionary and any amounts remaining in
27 the Settlement Fund after the deadline to cash checks has expired shall be distributed in a
second distribution, if feasible, or else disbursed to Washington Community Action Network

1 (Washington CAN) and Mary's Place, two non-profit organizations dedicated to expanding
2 access to and helping people with finding safe and affordable rental housing.

3 6. Defendants are ordered to comply with the non-monetary relief required by the
4 Settlement as follows:

5 a. Within thirty (30) days of full execution of this Settlement Agreement,
6 CDR shall cease all efforts to collect any amounts in excess of the
7 Principal allegedly owed by Class Members on their HNN accounts.

8 b. To the extent that CDR is furnishing information regarding the Settlement
9 Class Members' HNN Accounts, within thirty (30) days of the Effective
10 Date, CDR shall request deletion of all tradelines relating to Settlement
11 Class Members' HNN accounts that CDR or any related person or entity
12 has reported to any "consumer reporting agency" as that term is defined
13 in 15 U.S.C. 1681 ("Credit Bureaus") and will not re-report any of these
14 alleged debts. The request will be submitted via a "Universal Data Form"
15 or other similar written form. CDR's sole obligation shall be to submit the
16 request to suppress the reporting of tradeline(s) associated with the
17 Settlement Class Members' HNN Accounts, if any. Consumer reporting
18 agencies are separate entities from CDR. Accordingly, CDR is not
19 responsible for the performance of any of the consumer reporting agency
20 with respect to changing, deleting, suppressing, or making entries
21 regarding any credit information or other information regarding
22 Settlement Class Members' or any HNN Accounts. CDR shall not have a
23 continuing obligation to follow up with consumer reporting agencies to
24 insure deletion of any tradeline(s) related to the Settlement Class
25 Members' HNN Accounts. It is understood that HNN shall not have any
26 responsibility with respect to the deletion of any tradelines.
27

1 c. Within thirty (30) days of the Effective Date, CDR shall file satisfactions of
2 any judgment CDR has obtained against Settlement Class Members on
3 their HNN accounts in excess of the Principal. Courts and Judges are
4 separate entities from CDR. Accordingly, CDR is not responsible for the
5 performance of any Court or Judge with respect to changing, modifying
6 or revising any judgment. CDR shall not have an obligation beyond filing
7 and requesting modification of the judgment in compliance with RCW
8 4.56.100(1).

9 d. Within thirty (30) days of the Effective Date, CDR shall cease to add
10 prejudgment interest on HNN accounts.

11 7. The Court finally approves the Agreement, including the plans for
12 implementation and distribution of the Settlement Fund, and the prospective relief, and finds
13 that it is in all respects fair, reasonable, adequate, and in the best interest of the Class
14 Members and the result of extensive arm's length negotiations. The parties dispute the validity
15 of the claims in the action, and their dispute underscores not only the uncertainty of the
16 outcome but also why the Court finds the Agreement to be fair, reasonable, and adequate. Had
17 the parties continued to litigate, it is likely that Defendants would have filed dispositive
18 motions related to Class Members' claims. And Class Members would have faced the risk and
19 expense of trial, as well as possible appeals of the Court's class certification order and any
20 other dispositive rulings. Class Counsel find the Settlement to be in the best interests of the
21 Classes. For all these reasons, the Court finds that the uncertainties and expense of continued
22 litigation in both the trial and appellate courts weigh in favor of settlement approval. In making
23 this determination, the court has considered the criteria set forth in the recently amended
24 Federal Rule of Civil Procedure 23, and the factors outlined in *Churchill Village, L.L.C. v. General*
25 *Electric*, 361 F.3d 566, 575–76 (9th Cir. 2004).

26 8. The parties, their counsel, and the Class Administrator shall fulfill their
27 obligations and duties under the Agreement. The Agreement and every term and provision

1 thereof shall be deemed incorporated herein as if explicitly set forth and shall have the full
2 force of an order of this Court.

3 9. The Court dismisses with prejudice this action, the Released Claims, and the
4 Released Parties, and adjudges that the Released Claims are released against the Released
5 Parties.

6 10. The Court adjudges that Plaintiffs and the Settlement Class Members are
7 deemed to have fully, finally, completely, and forever released, relinquished, and discharged
8 the Released Claims against the Released Parties.

9 11. The Class Administrator executed the Notice Plan according to the terms of the
10 Agreement. The notices apprised the Class Members of the pendency of the litigation; of all
11 material elements of the proposed settlement, including but not limited to the relief afforded
12 the Classes under the Agreement; of the res judicata effect on members of the Classes and of
13 their opportunity to object to, comment on, or opt out of, the settlement; of the identity of
14 Class Counsel and Class Counsel's contact information; and of the right to appear at the Final
15 Approval Hearing. The notice given to Class Members satisfied the requirements of Federal
16 Rule of Civil Procedure 23 and the requirements of constitutional due process. Accordingly, the
17 Court determines that all Settlement Class Members are bound by this Final Approval Order.

18 12. The following individuals who timely submitted valid requests for exclusion are
19 excluded from the Settlement Classes and are not bound by this Final Approval Order: Sebia
20 Green and Laqurisha Russ. The Court, however, finds that the purported request for exclusion
21 submitted by Kianna Hall is invalid. First, Ms. Hall's original request, which was submitted by
22 her attorney, did not include Ms. Hall's address or signature and therefore did not comply with
23 the requirements for exclusion set forth in the Agreement. Second, Ms. Hall's amended
24 request, which was submitted to the Court by Class Counsel, was untimely. Therefore, Ms. Hall
25 is included in the Settlement Class and is bound by this Final Approval Order.

26 13. No Class Members objected to the Settlement.
27

1 14. All persons who have not made their objections to the settlement in the manner
2 provided in the Agreement are deemed to have waived any objections by appeal, collateral
3 attack, or otherwise.

4 15. Within thirty (30) days of the date of this Order, the Class Administrator shall
5 issue Settlement Awards to each Settlement Class Member with a deliverable address under
6 the terms of the Agreement.

7 16. The Court finds the more than 2,100 hours expended by Class Counsel in this
8 litigation and Class Counsel's hourly rates ranging from \$125 to \$550 to be reasonable and
9 approves payment of attorneys' fees and costs in the amount of \$600,000. This amount
10 reflects Class Counsel's reasonable lodestar. This amount shall be paid from the Settlement
11 Fund pursuant to the terms of the Agreement. The Court finds this amount to be appropriate
12 and reasonable in light of the work performed by Class Counsel and the excellent monetary
13 and prospective relief obtained for the Settlement Class Members. In addition, the Court finds
14 that the Agreement was negotiated at arm's length and without collusion.

15 17. The Court further grants Class Counsel's application for statutory damages and
16 service awards for Class Representatives Adama Jammeh and Oumie Sallah in the amount of
17 \$5,000 each and for Class Representative Cynthia Quintero in the amount of \$2,000. The Court
18 finds these amounts to be reasonable in light of the service performed by the Class
19 Representatives. This amount shall be paid from the Settlement Fund in accordance with the
20 terms of the Agreement.

21 18. Neither this Final Approval Order nor the Agreement is an admission or
22 concession by Defendants or any of the other Released Parties of the validity of any claims or
23 of any liability or wrongdoing or of any violation of law. Neither this Final Approval Order nor
24 the Agreement, nor any related document, proceeding, or action, nor any reports or accounts
25 thereof, shall be offered or received in evidence in any civil, criminal, or administrative
26 proceeding, other than proceedings that may be necessary to enforce the Settlement and the
27 Releases granted in the Settlement and this Final Approval Order.

1 19. Upon the Effective Date, the Class Representatives and each Settlement Class
2 Member will be deemed to have completely released and forever discharged the Released
3 Parties from the Released Claims. Released Claims means any and all claims of liability whether
4 known or unknown, suspected or unsuspected, asserted or unasserted, foreseen or
5 unforeseen, actual or contingent, liquidated or unliquidated, punitive or compensatory, that
6 were brought or that could have been brought in the Action as of the date this Agreement is
7 executed, relating to Move-Out Charges or procedures, Defendant HNN's collection or
8 retention of a security deposit, claims under RCW 59.18.260 and RCW 59.18.280, forfeiture of a
9 security deposit, imposition of Move-Out Charges, CDR's debt collection efforts related to Class
10 Members and their HNN Accounts, and/or payments to Defendants of any amount above the
11 Move-Out Charges reflected on the final move-out statement issued to a Settlement Class
12 Member by HNN, including, but not limited to, claims based on a violation of the CAA, FDCPA,
13 RLTA, CPA, and any other statutory or common law claim. This release does not extend to any
14 defenses or counterclaims Settlement Class Members may have to the amount of any Move-
15 Out Charges Defendants may seek to collect in a lawsuit, or any claims, defenses, or
16 counterclaims Settlement Class Members may have relating to wrongful eviction.

17 20. Representative Plaintiffs and all Settlement Class Members are deemed to have
18 agreed and covenanted, not to sue any Released Party with respect to any of the Released
19 Claims, or otherwise to assist others in doing so, and are forever barred from doing so, in any
20 court of law or equity, or any other forum.

21 21. The Court retains jurisdiction to consider all further matters arising out of or
22 connected with the settlement, including the implementation and enforcement of the
23 Agreement.

24 22. The Court finds that no justifiable reason exists for delaying entry of this Final
25 Approval Order and, good cause appearing, it is expressly directed that this Final Approval
26
27

1 Order and a separate Judgment be entered as final and appealable and the case dismissed with
2 prejudice.

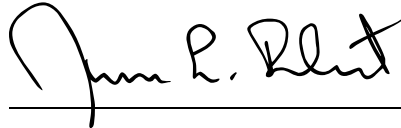
3 IT IS SO ORDERED.

4 DATED this 9th day of June, 2021.

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JAMES L. ROBART
United States District Judge

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Exhibit 3

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

JULIUS TERRELL, as an individual and as a
representative of the class,

Plaintiff,

v.

COSTCO WHOLESALE CORP.,

Defendant.

NO. 16-2-19140-1 SEA

~~[PROPOSED]~~ ORDER APPROVING
AWARD OF ATTORNEYS' FEES AND
COSTS

THIS MATTER came before the Court on June 15, 2018, on Plaintiff's Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and Class Representative Service Award. On June 15, 2018, the Court entered an order granting final approval of the Class Settlement, approving payment of the requested attorney's fees, costs and costs of settlement administration, and awarding a class representative service award. The Court makes the following additional findings regarding its award of attorneys' fees, costs and service award.

The Court heard oral argument on June 15, 2018, and has considered the following submissions:

- 1 1. Plaintiff's Motion for Attorneys' Fees, Costs, and Class Representative Service
- 2 Award;
- 3 2. The Declaration of E. Michelle Drake in support of Plaintiff's Motion for
- 4 Attorneys' Fees, Costs, and Class Representative Service Award;
- 5 3. The Declaration of Jennifer M. Keough Regarding Notice Administration and
- 6 Administration Costs; and
- 7 4. Plaintiff's Motion for Final Approval of Class Action Settlement and supporting
- 8 documentation.

9 Based on the foregoing, the Court makes the following FINDINGS AND
10 CONCLUSIONS:

- 11 1. Class Counsel is highly qualified. Berger & Montague, P.C. and Terrell
- 12 Marshall Law Group, are class action litigators with nationally known reputations, and
- 13 extensive experience litigating Fair Credit Reporting Act cases.
- 14 2. Throughout the litigation, Class Counsel provided high quality representation in
- 15 a case that turned out to be quite complex.
- 16 3. Class Counsel obtained an excellent result for the Settlement Class. Class
- 17 Counsel's work lead to the creation of a \$2.49 million common fund. Nearly 20% of the Class
- 18 submitted claims, and each class member who submitted a claim will be paid an estimated \$63.
- 19 These results exceed those achieved in similar cases.
- 20 4. The Settlement created a common fund for the benefit of class members.
- 21 Accordingly, the Court finds that the percentage of the fund method is the appropriate method
- 22 to use in determining the appropriate fee award in this case. *Bowles v. Wash. Dep't of Ret. Sys.*,
- 23 121 Wn.2d 52, 72, 847 P.2d 440 (1993).
- 24 5. An attorneys' fee award equal to one-third of a common fund is appropriate in
- 25 cases litigated under the Fair Credit Reporting Act. *King v. Gen. Info. Serv., Inc.*, No. 10-cv-
- 26 6850, ECF No. 126 (E.D. Penn. Nov. 4, 2014) (awarding counsel one-third of fund in FCRA

1 class action); *Ford v. CEC Entm't Inc.*, No. 14CV677 JLS (JLB), 2015 WL 11439033, at *1
2 (S.D. Cal. Dec. 14, 2015) (awarding fee of one-third in FCRA class action); *Razilov v.*
3 *Nationwide Mut. Ins. Co.*, No. 01-CV-1466-BR, 2006 WL 3312024, at *1 (D. Or. Nov. 13,
4 2006).

5 6. The Court has considered the factors set forth in Washington Rule of
6 Professional Conduct 1.5(a) in concluding that the requested fee is reasonable. Specifically:

- 7 a. The case raised novel and difficult questions of law, which demanded
8 litigators with the skill and experience of Class Counsel.
9 b. Class Counsel's work on this matter precluded work on other matters.
10 c. A one-third fee in contingency cases is customary in this county.
11 d. The excellent results obtained and the amount of time involved support
12 the award.

13 7. While the Court concludes that the percentage-of-the-fund method is appropriate
14 here, the Court concludes that the lodestar method confirms that the requested fee is reasonable.
15 Class Counsel devoted over 513 hours to the investigation, development, litigation and
16 resolution of this case, incurring over \$222,400.30 in lodestar. The Court has reviewed Class
17 Counsel's contemporaneous billing records documenting the hours worked and finds the hours
18 expended reasonable.

19 8. Class Counsel calculated their lodestar using reasonable hourly rates.

- 20 a. The following hourly rates billed by Berger and Montague are
21 reasonable given the experience and skill of counsel:

Timekeeper	Experience	Rate
E. Michelle Drake	Partner with 17 years of experience	\$700
Joseph Hashmall	Associate with 7 years of experience	\$515
John Albanese	Associate with 6 years of experience	\$430
Jean Hibray, Jean Ebersperger and Mai Xiong	Paralegals	\$230-\$280

1 b. The following hourly rates billed by Terrell Marshall Law Group are
2 reasonable given the experience and skill of counsel:

Timekeeper	Experience	Rate
Beth E. Terrell	Partner with 23 years of experience.	\$500
Amanda M. Steiner	Partner with 21 years of experience.	\$495
Jennifer R. Murray	Partner with 13 years of experience.	\$450
Maria C. Hoisington	Associate with 2 years of experience.	\$225
Bradford Kinsey, Holly Rota, Hannelore Ohaus, Samuel Levy	Paralegals and legal assistants.	\$75-\$100

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10 9. Similar rates have been approved numerous times in class action cases brought
11 in both the Western District of Washington and King County Superior Court. See, *e.g.*, *Carideo*
12 *v. Dell, Inc.*, No. 06-cv-01772, ECF No. 162 (W.D. Wash. Dec. 17, 2010) (Judge Robart
13 approving as reasonable a fee petition which included rates ranging from \$175 to \$600);
14 *Barnett v. Wal-Mart Stores, Inc.*, No. 01-2-24553-8 (King Co., July 20, 2009) (Judge Spector
15 approving fee request based on rates ranging from \$100 to \$760); *Splater v. Thermal Ease*
16 *Hydronic Systems, Inc.*, No. 03-2-33553-3 (King Co., July 31, 2009) (Judge Washington
17 approving fee request based on rates ranging from \$100 to \$760); *Hartman v. Comcast*
18 *Business Communications, LLC*, No. 10-0413, ECF No. 106 (W.D. Wash Dec. 8, 2011) (Judge
19 Lasnik approving Plaintiff's counsel's fee request based on rates ranging from \$180 to \$650).
20 Class Counsel are experienced, highly regarded members of the bar with extensive expertise in
21 the area of class actions and complex litigation involving Fair Credit Reporting Act claims like
22 those at issue here. Their requested hourly rates are reasonable in light of their qualifications
23 and experience.

24 10. Class Counsel's requested fee of \$830,000 represents a 3.73 multiplier on their
25 total lodestar to date. This requested multiplier is reasonable considering that counsel is seeking
26 one-third of the common fund created through the Settlement. See *Bowles*, 121 Wn.2d at 72-73
(approving multiplier of three where plaintiff's fee request was found reasonable using

1 percentage-of-the-fund method); see *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1051, n. 6
2 (9th Cir. 2002) (finding that in approximately 83% of cases surveyed by the court, the
3 multiplier was between 1.0 and 4.0 and affirming a multiplier of 3.65); *McIntosh v. McAfee,*
4 *Inc.*, No. 06-cv-7694, 2009 WL 673976, at *2 (N.D. Cal. 2009) (recognizing a range from “2 to
5 4 or even higher”); *Van Vranken v. Atlantic Richfield Co.*, 901 F. Supp. 294, 298 (N.D. Cal.
6 1995) (“[m]ultipliers in the 3-4 range are common”).

7 11. Class Counsel assumed significant risk in this case, a factor which further
8 justifies the requested multiplier. Class Counsel took this case on a contingency basis and have
9 devoted nearly two years to prosecuting it with no guarantee they would ever be paid for their
10 efforts. A review of the motions pending before this Court prior to settlement more illustrates
11 the risk Counsel took in taking on this case. Both the delay in payment and the risk involved in
12 this kind of case justify the multiplier requested here.

13 12. Class Counsel’s requested costs are also reasonable. Counsel submitted detailed
14 and itemized cost records to the Court, which the Court has reviewed, and approved.

15 13. The Settlement Administrator’s fee request is also reasonable. The
16 Administrator submitted a declaration describing the services performed in providing notice to
17 Class Members, processing claims, and answering Class Member inquires, among other tasks.
18 The fee charged for these services was reasonable, and is approved.

19 14. The Class Representative’s requested service payment is also reasonable.
20 Plaintiff assisted in the investigation, litigation and settlement of this case, and a \$3500 service
21 payment for his assistance to the Class is reasonable and appropriate.

22 **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

23 The following payments in connection with the Settlement may be deducted from the
24 settlement fund in accordance with the Court’s Final Approval Order and the Settlement
25 Agreement:

1 (1) attorneys' fees to Class Counsel in the amount of \$830,000, which is one-third
2 of the settlement fund;

3 (2) reimbursement of Class Counsel's out-of-pocket costs in the amount of
4 \$17,780.12;

5 (3) reimbursement of the Settlement Administrator's expenses in an amount not to
6 exceed \$179,822 to JND Administration; and

7 (4) a Class Representative Service Award of \$3,500 to Plaintiff Julius Terrell.

8 IT IS HEREBY ORDERED.

9 DATED this 19th day of June, 2018.



11
12 HONORABLE MARY E. ROBERTS
13 KING COUNTY SUPERIOR COURT JUDGE

14 *Presented by:*

15 TERRELL MARSHALL LAW GROUP PLLC

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