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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 SHARON GRACE

1 5. According to Mr. Arons' time records, he worked on this case for approximately
2 three and a half years. He began billing time for investigating this action on May 7, 2020 and
3 continued billing time through September 27, 2023 for an email sent to a plaintiff in connection
4 with the settlement.

5 6. The hours Mr. Arons recorded this matter, with reductions described below, are
6 set forth in Exhibit 1, to this declaration. Exhibit 1 was compiled from Mr. Arons'
7 contemporaneous time records.

8 7. In the exercise of billing judgment, it is this office's custom and practice not to
9 record time for minor tasks, such as short telephone calls, scheduling, or reviewing short emails
10 where a response is not required. If it is believed that too much time is taken on a task, such as
11 reviewing or drafting a filing, time billed is reduced and recorded accordingly.

12 8. I am aware that Mr. Aron's co-counsel in this matter, Blythe Chandler, has
13 carefully reviewed Mr. Aron's records and removed entries reflecting work on claims against
14 only the landlords in this matter. Ms. Chandler has also reduced by appropriate percentages
15 entries reflecting work related to claims against both CDR and the landlords. Ms. Chandler also
16 removed entries for time that was arguably duplicative of other work done by Mr. Aron's co-
17 counsel. I have reviewed and approved Ms. Chandler's revisions. After these billing reductions,
18 Mr. Aron's total time is 115.416 hours.

19 9. Mr. Arons' customary rate for litigation filed in the King County Superior Court
20 was \$550 per hour. Mr. Arons had substantial legal experience going back over forty years. This
21 included extensive experience representing plaintiffs in class actions under the Fair Debt
22 Collection Practices Act and related state laws, and also in challenging a number of predatory
23 practices targeting tenants and consumers.

24 10. Mr. Arons graduated from Golden Gate University School of Law in 1978, where
25 he was a law review writer and editor. While in school, he was a law clerk for two years in the
26 impact litigation unit of the San Francisco Neighborhood Legal Assistance Foundation. While
27 employed at the San Francisco Neighborhood Legal Assistance Foundation, he assisted on

1 several class actions successfully challenging different aspects of the California Welfare Reform
2 Act of 1969.

3 11. After graduation, Mr. Arons began work as an associate at the law office of
4 Gladstein & Gladstein in San Francisco. In 1981, he became a partner in the office of Gladstein
5 & Arons, which later became Gladstein, Benjamin & Arons, which, in 1986, became the Law
6 Offices of Paul Arons. Initially Mr. Arons focused on labor and employment law, representing
7 plaintiffs in a wide variety of employment disputes, including those concerning, race, sex and
8 age discrimination and wage payment. He represented individuals and labor unions on
9 employment matters in private labor arbitrations, in administrative proceedings before the
10 California Department of Fair Employment and Housing, the United States Equal Employment
11 Opportunity Commission, the United States Department of Labor, the California Department of
12 Industrial Relations, the National Labor Relations Board, and the California Unemployment
13 Insurance Appeals Board, in hearings and jury trials in the California Superior Court and the
14 United States District Court, and in appeals before the California Court of Appeals and Ninth
15 Circuit Court of Appeals. Beginning in 1985, Mr. Arons co-counseled class actions pursued in
16 both federal and state court.

17 12. Since approximately 1993 much of Mr. Arons' law practice was focused on
18 consumer class actions filed under the Fair Debt Collection Practices Act. Notable cases that Mr.
19 Arons co-counseled included *Newman v. Checkrite California, Inc.*, Civ. No. 93-1557 LKK (E.D.
20 Cal.), a seminal case in the area of FDCPA litigation against check collectors, in which a \$4.3
21 million settlement fund was created. The published summary judgment decision in that case,
22 *Newman v. Checkrite California, Inc.*, 912 F. Supp. 1354 (E.D. Cal. 1995), has been cited in over
23 one hundred federal court decisions. Mr. Arons also represented plaintiffs in a number of other
24 class actions filed pursuant to the FDCPA. *Ballard v. Equifax Check Servs., Inc.*, Civ. No. S-96-
25 1532 FCD (E.D. Cal., filed 8/26/96), was a case that involved almost 1,500,000 class members,
26 and settled for approximately \$8,000,000. There are three published opinions arising from that
27 lawsuit: *Ballard v. Equifax Check Servs., Inc.*, 27 F. Supp. 2d 1201(E.D. Cal. 1998) [granting

1 summary judgment for the individual plaintiff], *Ballard v. Equifax Check Servs., Inc.*, 186 F.R.D.
2 589 (E.D. Cal. 1999) [granting class certification], and *Ballard v. Equifax Check Servs., Inc.*, 158 F.
3 Supp. 2d 1163 (E.D. Cal. 2001) [granting classwide summary judgment on liability issues.] *Irwin*
4 *v. Mascott*, Civ. No. 97-4737 JL (E.D. Cal., filed 12/31/97), was an FDCPA class action that
5 involved approximately 600,000 class members and settled for more than a million dollars.
6 There are four published decisions in that case: *Irwin v. Mascott*, 96 F. Supp. 2d 968 (N.D. Cal.
7 1999) [granting class certification], *Irwin v. Mascott*, 94 F. Supp. 2d 1052 (N.D. Cal. 2000)
8 [denying defendants' motion to add third-party defendants], *Irwin v. Mascott*, 112 F. Supp. 2d
9 937 (N.D. Cal. 2000) [granting summary judgment and issuing permanent injunction], and *Irwin*
10 *v. Mascott*, 370 F.3d 924 (9th Cir. 2004) [affirming contempt order against defendants]. Mr.
11 Arons co-counseled *Hunt v. Check Recovery Sys.*, 241 F.R.D. 505 (N.D. Cal. 2007), an FDCPA class
12 action involving unlawful check collection charges. Plaintiffs prevailed on summary judgment.
13 *Hunt v. Check Recovery Sys.* 178 F. Supp. 2d 1157 (N.D. Cal. 2007). Defendant appealed that
14 decision to the Ninth Circuit, which referred the case to the California Supreme Court to decide
15 the state law issue of whether a debt collector may seek both a statutory service charge, and
16 prejudgment interest on a dishonored check. Mr. Arons argued the issue before the California
17 Supreme Court, which ruled for plaintiffs and against the debt collector. *Imperial Merchant*
18 *Servs., Inc. v. Hunt*, 47 Cal. 4th 381 (Cal. 2009), [97 Cal. Rptr. 3d 464]. In an interlocutory appeal
19 in the same case, Mr. Arons succeeded in obtaining the first federal appellate court ruling that a
20 district court has discretion to shift class notice costs to defendants, once liability is established.
21 *Hunt v. Imperial Merchant Servs., Inc.*, 560 F.3d 1137 (9th Cir. Cal. 2009).

22 13. Since becoming licensed to practice to practice law in the State of Washington in
23 2014, Mr. Arons represented Washington consumers in successful class actions against debt
24 collectors. These actions included *Cavnar v. Bounceback*, 2:14-CV-235-RMP (E.D. WA) and *Dibb*
25 *v. Allianceone Receivables Mgmt.*, No. 14-5835 RJB (W.D. Wash.), a class action, in which a
26 settlement was negotiated that provided almost \$2,000,000 in direct payments and debt relief
27 to class members. In another case involving tenant post-move out charges imposed by a

1 property management company, *Jammeh v. HNN Associates, et al.*, 2:19-cv-00620 (W.D. Wash),
2 plaintiffs obtained both prospective relief for a class of tenants, and \$1,600,000 in monetary
3 relief. Mr. Arons was plaintiff's counsel in a number of other class action lawsuits and was
4 continually involved in class action litigation since 1993. A LEXIS search shows over 100 federal
5 district and appellate court decisions in cases where Mr. Arons was either lead or co-lead
6 counsel.

7 14. In approximately 2003, Mr. Arons was honored by the Impact Fund for his work
8 in *Newman v. Checkrite*. In 2006, Mr. Arons was honored as Consumer Advocate of the Year by
9 the National Association of Consumer Advocates. Mr. Arons participated in a number of
10 presentations at the conferences of the National Consumer Law Center, the National
11 Association of Consumer Advocates and the Northwest Consumer Law Center.

12 I declare under penalty of perjury under the United States of America that the foregoing
13 is true to the best of my knowledge, that if called as a witness I could competently testify
14 thereto, and that this declaration is executed in Friday Harbor, Washington, on this 27th day of
15 November, 2023.

16
17 By: /s/ Sharon Grace, WSBA #48505
18 Sharon Grace, WSBA #48505
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DECLARATION OF SERVICE

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

Brad Fisher, WSBA #19895
Email: bradfisher@dwt.com
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Communities Management, LLC and Thrive
Communities, Inc.*

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- King County Electronic Filing System

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

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

15 DATED this 27th day of November, 2023.

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

Exhibit 1

Law Office of Paul Arons - Time Entry											
Date	Client	Cases Type	User	Activity	Description	Billable Time	Total Time	Reduction	Reduction Applied	Rate	Total Fees
05/11/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Draft case memo for co-counsel	1.00	1.00	50%	0.5	\$550	\$275
06/18/2020	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard to discuss filing strategy	0.40	0.40	50%	0.2	\$550	\$110
07/14/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Being drafting complaint	0.70	0.70	0%	0.7	\$550	\$385
07/27/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Complete initial draft of complaint.	1.20	1.20	0%	1.2	\$550	\$660
07/27/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Drafting counterclaim continued. Complete fact section and class definition	1.80	1.80	0%	1.8	\$550	\$990
08/11/2020	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Blythe Chandler and Sam Leonard re: filing strategy and motion to set aside default	0.30	0.30	0%	0.3	\$550	\$165
08/27/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise Motion to Set Aside Default	2.30	2.30	0%	2.3	\$550	\$1,265
08/30/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Extensive revisions to Motion to Set Aside Default, including research and document review.	6.20	6.20	0%	6.2	\$550	\$3,410
09/10/2020	Donte Gardiner	Litigation	Paul Arons	Correspondence	Research collateral estoppel and res judicata re: default judgments and send brief memo to Sam Leonard and Blythe Chandler re: plan of action	1.00	1.00	0%	1	\$550	\$550
09/26/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Review, revise and complete first draft of counter claim	1.10	1.10	50%	0.55	\$550	\$303
09/26/2020	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email Sam Leonard and Blythe Chandler first draft of counter claim with comments	0.10	0.10	50%	0.05	\$550	\$28
09/30/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Review and make further revisions to reply memo in support of motion to vacate judgment	0.10	0.10	0%	0.1	\$550	\$55
09/30/2020	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: further revisions to reply memo in support of motion to vacate judgment	0.10	0.10	0%	0.1	\$550	\$55
09/30/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise Sam Leonard draft of reply memorandum.	2.00	2.00	0%	2	\$550	\$1,100
10/01/2020	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Sam Leonard and Blythe Chandler re: following up on motion to vacate	0.10	0.10	0%	0.1	\$550	\$55
11/02/2020	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: adding FDCPA claim	0.10	0.10	0%	0.1	\$550	\$55
11/02/2020	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Blythe Chandler re: adding FDCPA claim	0.10	0.10	0%	0.1	\$550	\$55
11/11/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Draft written discovery to serve on Columbia Debt Recovery	1.80	1.80	0%	1.8	\$550	\$990
11/23/2020	Donte Gardiner	Litigation	Paul Arons	Draft	Review and edit written discovery to CDR. Exchange emails with co-counsel re: final changes to written discovery to Thrive and CDR	0.30	0.30	33%	0.201	\$550	\$111
12/08/2020	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email re: dismissal of Jose Salas (deceased)	0.10	0.10	0%	0.1	\$550	\$55
03/04/2021	Donte Gardiner	Litigation	Paul Arons	Review	Review and revise meet and confer letter to Columbia Debt Recovery	0.40	0.40	0%	0.4	\$550	\$220
03/16/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Meet and confer phone call with co-counsel and counsel for Columbia Debt Recovery and Thrive Communities	1.40	1.40	50%	0.7	\$550	\$385
03/16/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Blythe Chandler and Sam Leonard to discuss discovery	0.30	0.30	50%	0.15	\$550	\$83
03/17/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Further research and drafting of responses to CDR interrogatories to Gardiner	0.50	0.50	0%	0.5	\$550	\$275
03/17/2021	Donte Gardiner	Litigation	Paul Arons	Research	Review CDR discovery to plaintiffs and begin researching response	0.80	0.80	0%	0.8	\$550	\$440
03/17/2021	Donte Gardiner	Litigation	Paul Arons	Research	Review CDR discovery to plaintiffs and begin researching response	0.30	0.30	0%	0.3	\$550	\$165
03/18/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Complete researching and drafting responses to CDR document requests to Donte Gardiner/forward to Sam Leonard for initial factual review and investigation	0.80	0.80	0%	0.8	\$550	\$440
03/18/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Begin researching and drafting responses to CDR document requests to Donte Gardiner	0.80	0.80	0%	0.8	\$550	\$440
03/29/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review Brad Fisher letter re: CDR discovery positions and email comments and strategy to co-counsel	0.40	0.40	0%	0.4	\$550	\$220
03/30/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to co-counsel re: Rule 30(b)(6) notice for CDR and other issues	0.10	0.10	0%	0.1	\$550	\$55

Date	Client	Cases Type	User	Activity	Description	Billable Time	Total Time	Reduction	Reduction Applied	Rate	Total Fees
03/30/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Draft Rule 30(b)(6) notice for CDR, adapting notice from Jamme v. HNN	1.00	1.00	0%	1	\$550	\$550
04/02/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Review email from Sam Leonard re: draft discovery and make suggested changes/forward to Blythe Chandler	0.10	0.10	0%	0.1	\$550	\$55
04/29/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Sam Leonard re: discovery issue (bank records)	0.10	0.10	0%	0.1	\$550	\$55
05/19/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise meet and confer letter to CDR	0.20	0.20	0%	0.2	\$550	\$110
05/19/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Zoom meeting with Sam Leonard, Blythe Chandler and Sarah Smith	0.80	0.80	0%	0.8	\$550	\$440
05/20/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone calls with Sam Leonard/Blythe Chandler re: client status	0.20	0.20	0%	0.2	\$550	\$110
05/21/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Donte Gardiner and Sam Leonard	0.20	0.20	0%	0.2	\$550	\$110
05/26/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to multiple emails regarding Brad Fisher complaints about our clients' discovery responses. Review Brad Fisher letter and our discovery	0.40	0.40	0%	0.4	\$550	\$220
05/27/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review Brad Fisher email re: postponing phone call, draft proposed response, and circulate to co-counsel	0.10	0.10	0%	0.1	\$550	\$55
05/27/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Zoom call to meet and confer with Brad Fisher re: CDR discovery issues. No charge b/c my microphone malfunctioned	0.00	0.00	0%	0	\$550	\$0
05/27/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Zoom call with Beth Terrell, Sarah Smith and Sam Leonard re: CDR discovery and other issues	0.50	0.50	0%	0.5	\$550	\$275
05/28/2021	Donte Gardiner	Litigation	Paul Arons	Review	Review and edit confirming letter to Brad Fisher re: CDR discovery	0.30	0.30	0%	0.3	\$550	\$165
06/02/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re case status and possible amended pleadings	0.80	0.80	0%	0.8	\$550	\$440
06/02/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Blythe Chandler and Sam Leonard re: counterclaimant depositions and amending the answer	0.90	0.90	0%	0.9	\$550	\$495
06/03/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Review and draft lengthy response to Bard Fisher June 2, 2021 letter re: discovery, including researching [REDACTED]	1.20	1.20	0%	1.2	\$550	\$660
06/08/2021	Donte Gardiner	Litigation	Paul Arons	Review	Review and comment on draft letter to Brad Fisher re: discovery	0.10	0.10	0%	0.1	\$550	\$55
06/09/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Conference call with Sarah Smith, Beth Terrell, Blythe Chandler and Sam Leonard re: case status, discovery and planning	0.80	0.80	50%	0.4	\$550	\$220
07/01/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Sam Leonard re: claims against CDR	0.10	0.10	0%	0.1	\$550	\$55
07/02/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review emails from Brad Fisher regarding amended complaint and exchange multiple emails with co-counsel re: how to respond.	0.10	0.10	0%	0.1	\$550	\$55
09/02/2021	Donte Gardiner	Litigation	Paul Arons	Deposition	Followed entire deposition of Jordan Pierce but am only billing an hour for my comments and assistance to Sam Leonard.	1.00	1.00	0%	1	\$550	\$550
09/06/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review CDR deposition outline and email comments to co-counsel	0.20	0.20	0%	0.2	\$550	\$110
09/09/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Conference call with co-counsel to discuss strategy	0.50	0.50	0%	0.5	\$550	\$275
10/11/2021	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to emails regarding briefing rules	0.20	0.20	50%	0.1	\$550	\$55
10/12/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with co-counsel re: class certification issues	0.90	0.90	50%	0.45	\$550	\$248
10/14/2021	Donte Gardiner	Litigation	Paul Arons	Review	Review and edit class cert brief, including emailing preliminary comments to co-counsel	0.60	0.60	50%	0.3	\$550	\$165
10/14/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Make edits and corrections to class cert. brief and email to co-counsel	0.50	0.50	50%	0.25	\$550	\$138
11/24/2021	Donte Gardiner	Litigation	Paul Arons	Phone Call	Zoom call with co-counsel re; strategy for class cert. motion reply briefs	0.90	0.90	50%	0.45	\$550	\$248
12/02/2021	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise reply memo re: CDR opposition to class certification.	0.70	0.70	0%	0.7	\$550	\$385
03/02/2022	Donte Gardiner	Litigation	Paul Arons	Phone Call	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	1.00	1.00	50%	0.5	\$550	\$275

Date	Client	Cases Type	User	Activity	Description	Billable Time	Total Time	Reduction	Reduction Applied	Rate	Total Fees
03/02/2022	Donte Gardiner	Litigation	Paul Arons	Phone Call	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	1.00	1.00	50%	0.5	\$550	\$275
03/28/2022	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Blythe Chandler re: appeal and settlement.	0.10	0.10	50%	0.05	\$550	\$28
03/28/2022	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Sam Leonard re: settlement offer and appeal.	0.10	0.10	50%	0.05	\$550	\$28
04/28/2022	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise motion for discretionary review	1.50	1.50	50%	0.75	\$550	\$413
06/23/2022	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise reply memo on motion for discretionary review	0.60	0.60	50%	0.3	\$550	\$165
10/19/2022	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard and Blythe Chandler re: denial of discretionary review and strategy going forward.	0.90	0.90	50%	0.45	\$550	\$248
10/25/2022	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with co-counsel re: strategy for status conference and further action	0.50	0.50	50%	0.25	\$550	\$138
11/03/2022	Donte Gardiner	Litigation	Paul Arons	Review	Begin discovery review to prepare for new class certification effort/email questions to co-counsel.	2.00	2.00	50%	1	\$550	\$550
11/21/2022	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone calls with Sam Leonard regarding responding to Thrive/CDR settlement offer	0.80	0.80	50%	0.4	\$550	\$220
01/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Brad Fisher re: proposed amended class counterclaim.	0.30	0.30	0%	0.3	\$550	\$165
01/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email co-counsel re: filing motion for leave to amend and discovery	0.10	0.10	50%	0.05	\$550	\$28
01/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Brad fisher re: stipulating to filing of 3rd Amended Counterclaim	0.10	0.10	0%	0.1	\$550	\$55
01/30/2023	Donte Gardiner	Litigation	Paul Arons	Review	Review and organize prior discovery responses from CDR.	0.70	0.70	0%	0.7	\$550	\$385
01/30/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Zoom call re: CDR discovery with co-counsel	0.30	0.30	0%	0.3	\$550	\$165
01/31/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Brad Fisher re: prior CDR discovery objections	0.50	0.50	0%	0.5	\$550	\$275
01/31/2023	Donte Gardiner	Litigation	Paul Arons	Review	Review and organize prior CDR discovery responses	1.00	1.00	0%	1	\$550	\$550
02/01/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Begin draft of written summary of CDR deposition and exhibits relevant to class prejudgment interest issue, with focus on evidence related to compilation of class data.	2.10	2.10	0%	2.1	\$550	\$1,155
02/03/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Draft second set of discovery requests for CDR, including reviewing prior discovery responses in this case and Jammeh v. HNN.	1.40	1.40	0%	1.4	\$550	\$770
02/05/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review discovery and complaint and start draft of discovery to do list	1.00	1.00	0%	1	\$550	\$550
02/06/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Begin drafting motion to compel CDR to produce documents	0.90	0.90	0%	0.9	\$550	\$495
02/06/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review some of the prior discovery and email to co-counsel re: discovery issues	0.40	0.40	0%	0.4	\$550	\$220
02/07/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Continued drafting of motion to compel CDR to produce	1.40	1.40	0%	1.4	\$550	\$770
02/07/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Zoom call re: discovery and other issues with Sam Leonard and Blythe Chandler	0.30	0.30	0%	0.3	\$550	\$165
02/08/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Further drafting of motion to compel v. CDR, including emails with co-counsel	0.80	0.80	0%	0.8	\$550	\$440
02/08/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review email from Jeffery Hasson, speak with Blythe Chandler, send responsive email to all defendants	0.40	0.40	0%	0.4	\$550	\$220
02/09/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Complete initial researching and draft of Motion to Compel CDR	3.00	3.00	0%	3	\$550	\$1,650
02/14/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: discovery phone call and new discovery to CDR and Thrive	0.20	0.20	50%	0.1	\$550	\$55
02/14/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Meet and confer phone call with CDR (Jeff Hasson, Brad Fisher)	0.40	0.40	0%	0.4	\$550	\$220
02/17/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and annotate email from Brad Fisher re: document production/forward to Sam Leonard	0.40	0.40	0%	0.4	\$550	\$220

Date	Client	Cases Type	User	Activity	Description	Billable Time	Total Time	Reduction	Reduction Applied	Rate	Total Fees
02/17/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and incorporate Sam Leonard revisions, select and organize exhibits and draft supporting declaration consistent with the final version of the motion.	2.30	2.30	0%	2.3	\$550	\$1,265
02/20/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Draft response to Brad Fisher letter about discovery responses.	1.10	1.10	0%	1.1	\$550	\$605
02/24/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Emails to counsel for Thrive and CDR re: filing a response	0.20	0.20	50%	0.1	\$550	\$55
02/27/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and edit final version of discovery letter to Brad Fisher and Jeffery Hasson	0.20	0.20	0%	0.2	\$550	\$110
02/27/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: CDR discovery issues	0.10	0.10	0%	0.1	\$550	\$55
02/27/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and edit meet and confer letter to CDR	0.30	0.30	0%	0.3	\$550	\$165
02/28/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Jeff Hasson re: resolving outstanding discovery disputes.	0.20	0.20	0%	0.2	\$550	\$110
03/03/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Draft email confirming meet and confer phone call and including other discovery issues	0.70	0.70	0%	0.7	\$550	\$385
03/06/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Blythe Chandler re: discovery order and very preliminary data results.	0.20	0.20	0%	0.2	\$550	\$110
03/07/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Jeff Hasson re: CDR discovery	0.10	0.10	0%	0.1	\$550	\$55
03/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Quick review of CDR discovery responses and spreadsheet and review and respond to email from Sam Leonard regarding this discovery	0.30	0.30	0%	0.3	\$550	\$165
03/13/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review discovery responses and email opposing counsel to meet and confer	0.20	0.20	0%	0.2	\$550	\$110
03/14/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Blythe Chandler and Beth Terrell re: discovery status.	0.20	0.20	0%	0.2	\$550	\$110
03/14/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Detailed review of data compilation comparing it to prior discovery regarding the Gardiner/Pierce discovery, and sending email to Jeff Hasson explaining that the data compilation is wrong.	0.40	0.40	0%	0.4	\$550	\$220
03/14/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Research and begin revised draft of motion to compel v. CDR	1.20	1.20	0%	1.2	\$550	\$660
03/14/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review data compilation and respond to email from Jeff Hasson re: scheduling meet and confer phone call.	0.30	0.30	0%	0.3	\$550	\$165
03/15/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review discovery and draft notes in preparation for meet and confer phone call	0.50	0.50	0%	0.5	\$550	\$275
03/15/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Draft confirming letter re: meet and confer with Jeff Hasson, and send to Jasmin Rezale for review and editing	0.50	0.50	0%	0.5	\$550	\$275
03/15/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Meet and confer phone call with Jeff Hasson and Jasmin Rezale	0.40	0.40	0%	0.4	\$550	\$220
03/16/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Draft motion to compel CDR	2.90	2.90	0%	2.9	\$550	\$1,595
03/19/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Complete initial draft of Motion to Compel v Columbia Debt Recovery/select and organize exhibits.	3.20	3.20	0%	3.2	\$550	\$1,760
03/19/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review Jeff Hasson email regarding CDR's practices, review deposition transcript and other evidence and send response	0.80	0.80	0%	0.8	\$550	\$440
03/20/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Conference call with Blythe Chandler and Jasmin Resale re: case status	0.50	0.50	0%	0.5	\$550	\$275
03/21/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Draft Declaration of Paul Arons in Support of Motion to Compel CDR Discovery	0.80	0.80	0%	0.8	\$550	\$440
03/27/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Sam Leonard re: case status	0.10	0.10	0%	0.1	\$550	\$55
03/28/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Conference call with Blythe Chandler and Sam Leonard re: case status	1.10	1.10	50%	0.55	\$550	\$303
03/29/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review CDR opposition to motion to compel discovery, research and being drafting reply brief	1.00	1.00	0%	1	\$550	\$550
03/30/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to Jeff Hasson re: correct referral date for Thrive accounts	0.10	0.10	0%	0.1	\$550	\$55
03/30/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Complete first draft of memo in reply re: Mot to Compel CDR discovery	6.00	6.00	0%	6	\$550	\$3,300

Date	Client	Cases Type	User	Activity	Description	Billable Time	Total Time	Reduction	Reduction Applied	Rate	Total Fees
03/31/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Draft supplemental declaration in support of motion to compel	0.40	0.40	0%	0.4	\$550	\$220
04/04/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review Sam Leonard's email re: interpretation of CDR spreadsheet, review spreadsheet and respond.	0.30	0.30	0%	0.3	\$550	\$165
04/05/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Jodi Nuss (TMLG), re Thrive and CDR spreadsheet data analysis.	0.20	0.20	50%	0.1	\$550	\$55
04/05/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Blythe Chandler and Sam Leonard re: discovery strategy and opposition to motion to deny class certification	0.50	0.50	0%	0.5	\$550	\$275
04/06/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and analyze data and draft email with summary for Blythe Chandler	0.50	0.50	0%	0.5	\$550	\$275
04/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Draft email to CDR counsel re: discussion of discovery order compliance, confirming agreement and identifying issues.	0.60	0.60	0%	0.6	\$550	\$330
04/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Blythe Chandler : key word search terms.	0.10	0.10	0%	0.1	\$550	\$55
04/10/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Draft confirming email re: Zoom conference with CDR counsel and forward to Blythe Chandler for review	0.30	0.30	0%	0.3	\$550	\$165
04/10/2023	Donte Gardiner	Litigation	Paul Arons	Meeting	Phone call with Mark Case (CDR), Jeff Hasson and Blythe Chandler re: CDR discovery order	0.50	0.50	0%	0.5	\$550	\$275
04/11/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call /w Sam Leonard re: CDR discovery issues.	0.20	0.20	0%	0.2	\$550	\$110
04/13/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from potential plaintiff v. CDR	0.20	0.20	0%	0.2	\$550	\$110
04/13/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review, research and respond to email from Brad Fisher re: word limits and filing deadlines for CDR's motion.	0.20	0.20	0%	0.2	\$550	\$110
04/13/2023	Donte Gardiner	Litigation	Paul Arons	Review	Research substituting class plaintiff and send email to co-counsel.	1.20	1.20	0%	1.2	\$550	\$660
04/13/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Blythe Chandler re: CDR request for extension.	0.10	0.10	0%	0.1	\$550	\$55
04/14/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Review and respond to emails from potential plaintiff	0.20	0.20	0%	0.2	\$550	\$110
04/14/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Draft email confirming substance of meet and confer phone call with CDR	0.40	0.40	0%	0.4	\$550	\$220
04/14/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with potential plaintiff	0.30	0.30	0%	0.3	\$550	\$165
04/14/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Jeff Hasson, Mark Case and Sam Leonard re: discovery issues	1.10	1.10	0%	1.1	\$550	\$605
04/14/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: CDR discovery issues	0.50	0.50	0%	0.5	\$550	\$275
04/15/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Continued drafting of motion to amend, including analysis of Gustov Cortez facts.	2.00	2.00	0%	2	\$550	\$1,100
04/15/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Begin drafting motion for leave to amend.	0.50	0.50	0%	0.5	\$550	\$275
04/16/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Complete drafting of 5th Amended Counterclaim	1.20	1.20	0%	1.2	\$550	\$660
04/17/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review [REDACTED] and draft factual allegations for new class plaintiffs	0.60	0.60	0%	0.6	\$550	\$330
04/17/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review edits to motion for leave to amend made by Blythe Chandler and Sharon Grace and begin revising the motion.	1.80	1.80	0%	1.8	\$550	\$990
04/18/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Revise motion for leave to file amended complaint	1.70	1.70	0%	1.7	\$550	\$935
04/18/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Review various emails regarding scheduling of motions to deny class certification and have conference call with co-counsel re: how to respond.	0.90	0.90	30%	0.63	\$550	\$347
04/18/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Further revisions to motion for leave to amend	0.40	0.40	0%	0.4	\$550	\$220
04/18/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to co-counsel re: motion for leave to amend	0.10	0.10	0%	0.1	\$550	\$55
04/18/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Revise complaint to make it consistent with motion for leave to amend	0.40	0.40	0%	0.4	\$550	\$220
04/18/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to CDR counsel re: production of data compilation.	0.10	0.10	0%	0.1	\$550	\$55
04/20/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard to discuss CDR discovery issues and motion to deny class cert.	0.30	0.30	0%	0.3	\$550	\$165

Date	Client	Cases Type	User	Activity	Description	Billable Time	Total Time	Reduction	Reduction Applied	Rate	Total Fees
04/20/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and revise motion for leave to file motion for leave to file amended complaint and supporting declaration.	1.60	1.60	0%	1.6	\$550	\$880
04/20/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Draft email to Jeff Hasson re: compliance with discovery order	0.50	0.50	0%	0.5	\$550	\$275
04/21/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Jeff Hasson re: CDR compliance with discovery order.	0.30	0.30	0%	0.3	\$550	\$165
04/21/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: CDR compliance with discovery order.	0.30	0.30	0%	0.3	\$550	\$165
04/21/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review discovery and email Sam Leonard re: interest charges	0.20	0.20	0%	0.2	\$550	\$110
04/24/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to emails from Jeff Hasson and co-counsel re: stipulation to extend time/draft stipulation to extend time and circulate to co-counsel	0.50	0.50	0%	0.5	\$550	\$275
04/24/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to email from Jeff Hasson arguing about language in the Stipulation Extending Time for CDR to Comply with Discovery Order	0.20	0.20	0%	0.2	\$550	\$110
04/24/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email co-counsel about potential call rep who is paid in full	0.10	0.10	0%	0.1	\$550	\$55
04/24/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: CDR data and responding to motion to deny class certification	0.20	0.20	0%	0.2	\$550	\$110
04/25/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review and respond to Brad Fisher proposal for concession in response to our request for a continuance.	0.60	0.60	0%	0.6	\$550	\$330
04/25/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Review Blythe Chandler email call here re: Brad Fisher proposal for concessions in response to our request for a continuance.	0.20	0.20	0%	0.2	\$550	\$110
04/25/2023	Donte Gardiner	Litigation	Paul Arons	Meeting	Zoom meeting with Blythe Chandler, Amanda Steiner and Sam Leonard to discuss motions to deny class certification	0.60	0.60	50%	0.3	\$550	\$165
04/26/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to co-counsel re: phone call from Brad Fisher re: extension of time. CDR person handling data compilation has left. Is proposing June 9 and hearing date, push back motion to amend one week, and extend discovery to May 19.	0.20	0.20	0%	0.2	\$550	\$110
04/26/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call from Jeff Hasson re: phone call from Brad Fisher re: extension of time. CDR person handling data compilation has left. Is proposing June 9 and hearing date, push back motion to amend one week, and extend discovery to May 19.	0.10	0.10	0%	0.1	\$550	\$55
04/26/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Email to CDR counsel and counsel for all parties re: continuance	0.20	0.20	50%	0.1	\$550	\$55
05/15/2023	Donte Gardiner	Litigation	Paul Arons	Review	Review supplemental CDR court-ordered discovery responses, compare with existing data and forward comments to co-counsel	0.40	0.40	0%	0.4	\$550	\$220
05/24/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and edit opposition to CDR Motion to Deny Class Certification.	0.60	0.60	0%	0.6	\$550	\$330
05/24/2023	Donte Gardiner	Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: opposition to CDR Motion to Deny Class Certification.	0.30	0.30	0%	0.3	\$550	\$165
05/25/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and edit revised opposition to CDR Motion to Deny Class Certification.	0.40	0.40	0%	0.4	\$550	\$220
06/12/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Review and edit revisions to proposed findings of fact and conclusions of law for Thrive/Belcorp/CDR Motions to Deny Class Certification	0.50	0.50	33%	0.335	\$550	\$184
06/23/2023	Donte Gardiner	Litigation	Paul Arons	Meeting	Zoom meeting with co-counsel re: strategy with CDR and Thrive orders	1.00	1.00	50%	0.5	\$550	\$275
06/23/2023	Donte Gardiner	Litigation	Paul Arons	Draft	Draft short memo for Zoom meeting with co-counsel re: strategy with CDR and Thrive orders	0.20	0.20	50%	0.1	\$550	\$55
06/28/2023	Donte Gardiner	Litigation	Paul Arons	Correspondence	Review email from Blythe Chandler re CDR class motion and settlement, review data files and respond.	0.30	0.30	0%	0.3	\$550	\$165

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06/28/2023	Donte Gardiner	Litigation	Paul Arons	Meeting	Zoom call with Blythe Chandler and Sam Leonard re: CDR settlement and class certification	0.50	0.50	0%	0.5	\$550	\$275
06/29/2023		Litigation	Paul Arons	Correspondence	Emails with co-counsel re: settlement offer letter and phone calls to plaintiffs	0.20	0.20	0%	0.2	\$550	\$110
06/30/2023		Litigation	Paul Arons	Correspondence	Review email from Jeff Hasson and email co-counsel re: response	0.30	0.30	0%	0.3	\$550	\$165
07/10/2023		Litigation	Paul Arons	Draft	Revise stipulation to stay proceedings and sent to CDR counsel for review	0.10	0.10	0%	0.1	\$550	\$55
07/10/2023		Litigation	Paul Arons	Correspondence	Review and respond to Jeff Hasson email re: stipulation	0.20	0.20	0%	0.2	\$550	\$110
07/10/2023		Litigation	Paul Arons	Meeting	Zoom call with Blythe Chandler and Sam Leonard re: settlement proposal	0.60	0.60	0%	0.6	\$550	\$330
07/10/2023		Litigation	Paul Arons	Meeting	Zoom call re: settlement with Jeff Hasson, Mark Case, Blythe Chandler, Sam Leonard	0.70	0.70	0%	0.7	\$550	\$385
07/11/2023		Litigation	Paul Arons	Review	Review and respond to email from Blythe Chandler re: response to Jeff Hasson in connection with CDR settlement	0.10	0.10	0%	0.1	\$550	\$55
07/12/2023		Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard to analyze CDR interest data	0.30	0.30	0%	0.3	\$550	\$165
07/12/2023		Litigation	Paul Arons	Correspondence	Review and respond to email from Sam Leonard re: CDR revised damage calculations	0.20	0.20	0%	0.2	\$550	\$110
07/12/2023		Litigation	Paul Arons	Correspondence	Review email from Jeff Hasson re: RCW 19.16.450 and Fireside, review case and email co-counsel re: settlement discussions	0.30	0.30	0%	0.3	\$550	\$165
07/13/2023		Litigation	Paul Arons	Draft	Recompile CDR damages list from CDR1789 and send to Blythe to use in settlement communication with CDR.	0.40	0.40	0%	0.4	\$550	\$220
07/13/2023		Litigation	Paul Arons	Meeting	Zoom call with Sam Leonard and Blythe Chandler re CDR damage calculations	1.10	1.10	0%	1.1	\$550	\$605
07/18/2023		Litigation	Paul Arons	Correspondence	Review email from Jeff Hasson re: CDR settlement and send comments to co-counsel	0.30	0.30	0%	0.3	\$550	\$165
07/18/2023		Litigation	Paul Arons	Meeting	Zoom meeting with Jeff Hasson, Mark Case and Blythe Chandler to discuss CDR settlement	0.40	0.40	0%	0.4	\$550	\$220
07/19/2023		Litigation	Paul Arons	Review	Review settlement agreement drafted by Blythe Chandler and email comments	1.00	1.00	0%	1	\$550	\$550
07/28/2023		Litigation	Paul Arons	Phone Call	Discuss CDR settlement offer Mosley, Peltier and Cortez.	0.40	0.40	0%	0.4	\$550	\$220
08/01/2023		Litigation	Paul Arons	Draft	Review renewed settlement email from Jeff Hasson and forward to co-counsel with comments	0.10	0.10	0%	0.1	\$550	\$55
08/01/2023		Litigation	Paul Arons	Review	Review Blythe Chandler's proposed response to Jeff Hasson settlement email, review RCW 19.16.450 cases, and respond to Blythe's email	0.30	0.30	0%	0.3	\$550	\$165
08/02/2023		Litigation	Paul Arons	Correspondence	Review email from Jeff Hasson re: proposal to excluded BK accounts and forward comments to co-counsel	0.10	0.10	0%	0.1	\$550	\$55
08/09/2023		Litigation	Paul Arons	Phone Call	Phone call with Sam Leonard re: CDR settlement offer	0.20	0.20	0%	0.2	\$550	\$110
08/11/2023		Litigation	Paul Arons	Correspondence	Emails to plaintiffs re: CDR settlement offer	0.20	0.20	0%	0.2	\$550	\$110
08/16/2023		Litigation	Paul Arons	Draft	Review and edit CDR settlement agreement	0.40	0.40	0%	0.4	\$550	\$220
08/18/2023		Litigation	Paul Arons	Phone Call	Phone call with Blythe Chandler re: negotiating settlement agreement with CDR	0.20	0.20	0%	0.2	\$550	\$110
09/13/2023		Litigation	Paul Arons	Draft	Review Jeff Hasson notes on settlement docs and forward comments to co-counsel	0.20	0.20	0%	0.2	\$550	\$110
						126.20			115.416		\$63,479