

EXHIBIT

A

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/11/20	PA	Draft case memo for co-counsel	0.5	\$550.00	\$275.00
05/18/20	SL	File Information	0.2	\$495.00	\$99.00
05/21/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00
05/27/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00
05/27/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00
06/18/20	PA	Phone call with Sam Leonard to discuss filing strategy	0.2	\$550.00	\$110.00
07/13/20	SL	Facts - Motion to Vacate	0.2	\$495.00	\$99.00
07/14/20	PA	Being drafting complaint	0.7	\$550.00	\$385.00
07/17/20	SL	Motion to Vacate	2.6	\$495.00	\$1,287.00
07/17/20	SL	Documents regarding failure to serve and facts	0.2	\$495.00	\$99.00
07/20/20	SL	Researching Hurricane and Service Issues	0.3	\$495.00	\$148.50
07/20/20	SL	Facts and Documents MTV	0.4	\$495.00	\$198.00
07/20/20	SL	Facts and Documents MTV	0.2	\$495.00	\$99.00
07/21/20	SL	Motion to Vacate	0.3	\$495.00	\$148.50
07/27/20	PA	Complete initial draft of complaint.	1.2	\$550.00	\$660.00
07/27/20	PA	Drafting counterclaim continued. Complete fact section and class definition	1.8	\$550.00	\$990.00
07/27/20	SL	MTV and research	2.2	\$495.00	\$1,089.00
07/27/20	SL	Call with PA regarding Motion to Vacate and CAA violatio	0.2	\$495.00	\$99.00
07/27/20	SL	Facts and Documents MTV	0.4	\$495.00	\$198.00
07/27/20	SL	Gardiner Motion to Vacate Documents and questions	0.2	\$495.00	\$99.00
07/27/20	SL	CAA and CPA claims against CDR and claims against Thriv	0.2	\$495.00	\$99.00
07/28/20	SL	Drafting MTV and emailing with clients regarding facts	1.6	\$495.00	\$792.00
07/28/20	SL	Facts and Documents MTV	0.5	\$495.00	\$247.50
07/29/20	SL	Researching Hurricane - MTV	0.4	\$495.00	\$198.00
07/29/20	SL	MTV	1.2	\$495.00	\$594.00
07/29/20	SL	Facts and Documents MTV	0.5	\$495.00	\$247.50
07/30/20	SL	Call regarding researching whereabouts on the day of ser	1.0	\$495.00	\$495.00
07/31/20	SL	Forwarding Address	0.2	\$495.00	\$99.00
07/31/20	SL	Emails from The Eden	0.2	\$495.00	\$99.00
08/04/20	SL	Motion to Vacate	3.2	\$495.00	\$1,584.00

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Date	Initials	Narrative	Units	Rate	Value
08/04/20	SL	Bank and Phone Records	0.2	\$495.00	\$99.00
08/04/20	SL	Legality of interest and Early Move out Penalty	0.2	\$495.00	\$99.00
08/11/20	PA	Phone call with Blythe Chandler and Sam Leonard re: filing strategy and motion to set aside default	0.3	\$550.00	\$165.00
08/11/20	SL	MTV	1.1	\$495.00	\$544.50
08/13/20	SL	RE: Phone Bill & Bank statement	0.2	\$495.00	\$99.00
08/13/20	SL	Facts and Documents MTV	0.2	\$495.00	\$99.00
08/19/20	SL	MTV	0.4	\$495.00	\$198.00
08/19/20	SL	MTV	1.2	\$495.00	\$594.00
08/19/20	SL	Facts and Documents - RE: Flight Back	0.2	\$495.00	\$99.00
08/19/20	SL	RE: Questions to help with your case	0.2	\$495.00	\$99.00
08/19/20	SL	Emails with Thrive - Moveout Charges	0.2	\$495.00	\$99.00
08/21/20	SL	MTV	0.8	\$495.00	\$396.00
08/22/20	SL	MTV	1.4	\$495.00	\$693.00
08/26/20	SL	MTV & Gardiner Declaration	8.2	\$495.00	\$4,059.00
08/26/20	SL	Status	0.2	\$495.00	\$99.00
08/26/20	SL	Facts and Documents - One other question.	0.2	\$495.00	\$99.00
08/26/20	SL	RE: One other question.	0.2	\$495.00	\$99.00
08/26/20	SL	Draft CDR v. Gardiner - Motion to Vacate	0.2	\$495.00	\$99.00
08/26/20	SL	Declarations	0.2	\$495.00	\$99.00
08/27/20	PA	Review and revise Motion to Set Aside Default	2.3	\$550.00	\$1,265.00
08/27/20	SL	MTV & Gardiner and Pierce Declarations	2.3	\$495.00	\$1,138.50
08/27/20	SL	RE: CDR v. Gardiner - Motion to Vacate	0.2	\$495.00	\$99.00
08/27/20	SL	MTV Editing	0.2	\$495.00	\$99.00
08/27/20	SL	Gardiner Declaration	0.2	\$495.00	\$99.00
08/27/20	SL	More Questions	0.2	\$495.00	\$99.00
08/28/20	SL	Call with Jordan regarding declaration	0.6	\$495.00	\$297.00
08/28/20	SL	Draft Facts	0.2	\$495.00	\$99.00
08/30/20	PA	Extensive revisions to Motion to Set Aside Default, including research and document review.	6.2	\$550.00	\$3,410.00

Date	Initials	Narrative	Units	Rate	Value
08/31/20	SL	Declaration of Leonard, Proposed Order, Motion for Ord	1.3	\$495.00	\$643.50
08/31/20	SL	MTV and CAA violations	0.2	\$495.00	\$99.00
08/31/20	SL	MTV and CAA violations	0.2	\$495.00	\$99.00
08/31/20	SL	CDR v. Jordan Pierce and Donte Gardiner - Notice of App	0.2	\$495.00	\$99.00
08/31/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
08/31/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
08/31/20	SL	CDR v. Pierce and Gardiner - Motion to Vacate	0.2	\$495.00	\$99.00
09/09/20	SL	Status Update	0.2	\$495.00	\$99.00
09/10/20	PA	Research collateral estoppel and res judicata re: default judgments and send brief memo to Sam Leonard and Blythe Chandler re: plan of action	1.0	\$550.00	\$550.00
09/10/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
09/14/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
09/14/20	SL	Request for Hearing - Columbia Debt Recovery v. Pierce e	0.2	\$495.00	\$99.00
09/18/20	SL	Hearing on MTV Status	0.1	\$495.00	\$49.50
09/21/20	SL	MTV Hearing	0.1	\$495.00	\$49.50
09/22/20	BHC	New matter and conflict check; drafted representation agreement [4].	0.2	\$495.00	\$99.00
09/22/20	SL	Drafting/Reviewing CorrespondenReviewing order regarding ex-parte filing from the court	0.2	\$495.00	\$99.00
09/22/20	SL	Emailing with Co-Counsel RE: order regarding ex-parte filing	0.2	\$495.00	\$99.00
09/22/20	SL	Email with Court Hearing schedule - Ex parte Order	0.2	\$495.00	\$99.00
09/22/20	SL	Emailing with Co-Counsel RE: Gardiner v. CDR/Thrive	0.2	\$495.00	\$99.00
09/26/20	PA	Review, revise and complete first draft of counter claim	0.6	\$550.00	\$303.00
09/26/20	PA	Email Sam Leonard and Blythe Chandler first draft of counter claim with comments	0.1	\$550.00	\$28.00

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Date	Initials	Narrative	Units	Rate	Value
09/28/20	SL	Reviewing Opposing Party PleadinResponse to Motion to Vacate	0.5	\$495.00	\$247.50
09/28/20	SL	Reply to Response to Motion to Vacate	1.2	\$495.00	\$594.00
09/28/20	SL	MTV - Moveout emails with Thrive	0.2	\$495.00	\$99.00
09/28/20	SL	CDR's Response to MTV	0.2	\$495.00	\$99.00
09/28/20	SL	CDR's Response to MTV	0.2	\$495.00	\$99.00
09/29/20	SL	Reply	6.8	\$495.00	\$3,366.00
09/30/20	PA	Review and make further revisions to reply memo in support of motion to vacate judgment	0.1	\$550.00	\$55.00
09/30/20	PA	Phone call with Sam Leonard re: further revisions to reply memo in support of motion to vacate judgment	0.1	\$550.00	\$55.00
09/30/20	PA	Review and revise Sam Leonard draft of reply memorandum.	2.0	\$550.00	\$1,100.00
09/30/20	SL	Editing Reply	1.0	\$495.00	\$495.00
09/30/20	SL	Supp. Decl. of Gardiner and Pierce	1.0	\$495.00	\$495.00
09/30/20	SL	Reply edits	0.2	\$495.00	\$99.00
09/30/20	SL	Reply	0.1	\$495.00	\$49.50
10/01/20	PA	Email to Sam Leonard and Blythe Chandler re: following up on motion to vacate	0.1	\$550.00	\$55.00
10/01/20	SL	MTV Hearing	2.1	\$495.00	\$1,039.50
10/01/20	SL	Motion to Set Aside Default	0.7	\$495.00	\$346.50
10/01/20	SL	Reply does not appear in the docket	0.2	\$495.00	\$99.00
10/01/20	SL	Hearing Over No Decision Yet	0.1	\$495.00	\$49.50
10/01/20	SL	Hearing	0.2	\$495.00	\$99.00
10/01/20	SL	Hearing	0.2	\$495.00	\$99.00
10/07/20	SL	Settlement Offer	0.2	\$495.00	\$99.00
10/07/20	SL	Settlement Offer	0.2	\$495.00	\$99.00
10/09/20	SL	Settlement Offer	0.3	\$495.00	\$148.50
10/09/20	SL	Settlement Offer	0.2	\$495.00	\$99.00

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Date	Initials	Narrative	Units	Rate	Value
10/09/20	SL	Settlement Offer and Case Strength	0.2	\$495.00	\$99.00
10/13/20	SL	RE: Settlement Offer	0.1	\$495.00	\$49.50
10/13/20	SL	Settlement and Order Status	0.2	\$495.00	\$99.00
10/16/20	SL	Settlement Offer and Case Strength	0.2	\$495.00	\$99.00
		Prepared draft and finalized Defendant's answer and counterclaims [1.1];			
11/02/20	BKK	prepared draft of petition to remove to superior court [5].	0.8	\$125.00	\$100.00
11/02/20	PA	Phone call with Sam Leonard re: adding FDCPA claim	0.1	\$550.00	\$55.00
11/02/20	PA	Email to Blythe Chandler re: adding FDCPA claim	0.1	\$550.00	\$55.00
11/02/20	SL	Editing Counterclaims	1.0	\$495.00	\$495.00
11/02/20	SL	MTV - Order Granting	0.3	\$495.00	\$148.50
11/02/20	SL	MTV Granted	0.2	\$495.00	\$99.00
11/02/20	SL	MTV Granted	0.2	\$495.00	\$99.00
11/03/20	BHC	Reviewed final filed complaint [3].	0.1	\$495.00	\$49.50
11/03/20	BKK	Reviewed, revised and finalized petition to remove to superior court [2].	0.1	\$125.00	\$12.50
11/06/20	EBN	Worked on petition for removal and exhibits to same.	1.0	\$200.00	\$200.00
11/11/20	PA	Draft written discovery to serve on Columbia Debt Recovery	1.8	\$550.00	\$990.00
11/19/20	BG	Revised discovery requests to CDR [1.6]	1.6	\$325.00	\$520.00
		Reviewed affidavit and notice of appearance [0.2]; reviewed rules related			
11/19/20	BG	to affidavit of prejudice [0.3].	0.2	\$325.00	\$65.00
11/19/20	BHC	Reviewed notices of appearance and request for change of judge [2].	0.1	\$495.00	\$49.50
11/20/20	BHC	Worked on motion to disqualify judge; research regarding same [3].	0.1	\$495.00	\$49.50
		Worked on and finalized notice of appearance, declaration of service, note			
11/20/20	HMR	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

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Date	Initials	Narrative	Units	Rate	Value
11/23/20	BG	Worked on discovery requests [1.5].	0.7	\$325.00	\$227.50
11/23/20	PA	Review and edit written discovery to CDR. Exchange emails with co counsel re: final changes to written discovery to Thrive and CDR	0.2	\$550.00	\$111.00
11/24/20	BG	Revised discovery requests to Thrive and CDR [0.9].	0.4	\$325.00	\$130.00
12/01/20	BG	Case management [0.1]; reviewed and responded to email from co-counsel [0.1].	0.1	\$325.00	\$32.50
12/08/20	BHC	Telephone conference with Mr. Fisher regarding case schedule [.2]; exchanged emails with co-counsel regarding same [.2].	0.4	\$495.00	\$198.00
12/08/20	PA	Review and respond to email re: dismissal of Jose Salas (deceased)	0.1	\$550.00	\$55.00
12/18/20	BHC	Email to Mr. Fisher regarding case management matters [.1].	0.1	\$495.00	\$49.50
01/19/21	BHC	Email to opposing counsel regarding requested extension and case management [.2].	0.1	\$495.00	\$49.50
01/22/21	BHC	Approved discovery requests for service; exchanged emails with staff regarding same [.3].	0.1	\$495.00	\$49.50
01/29/21	BHC	Telephone conference with all counsel regarding case management and class certification schedule [.5]; prepared for same [.3].	0.4	\$495.00	\$198.00
01/29/21	SL	Meeting with opposing counsel RE discovery	0.4	\$495.00	\$198.00
02/23/21	BG	Case management [0.2].	0.1	\$325.00	\$32.50
03/02/21	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
03/03/21	BG	Worked on meet and confer letter for CDR [4.0].	4.0	\$325.00	\$1,300.00

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
03/03/21	BG	Coordinated drafting of protective order [0.2].	0.1	\$325.00	\$32.50
03/04/21	BG	Worked on meet and confer letter for CDR [0.5].	0.5	\$325.00	\$162.50
03/04/21	PA	Review and revise meet and confer letter to Columbia Debt Recovery	0.4	\$550.00	\$220.00
03/05/21	BHC	Worked on discovery letters to Thrive and CDR [1.1]; worked on document review [.5].	0.8	\$495.00	\$396.00
03/10/21	BHC	Read decisions granting summary judgment against Columbia Debt Recovery [.4].	0.4	\$495.00	\$198.00
03/10/21	BHC	Exchanged emails with co-counsel and all counsel regarding case management and discovery conference [.4].	0.2	\$495.00	\$99.00
03/16/21	PA	Meet and confer phone call with co-counsel and counsel for Columbia Debt Recovery and Thrive Communities	0.7	\$550.00	\$385.00
03/16/21	PA	Phone call with Blythe Chandler and Sam Leonard to discuss discovery	0.2	\$550.00	\$83.00
03/16/21	SL	Discovery conference with Thrive and CDR	1.6	\$495.00	\$792.00
03/16/21	SL	Call with Co-counsel RE Next steps	0.2	\$495.00	\$99.00
03/16/21	SL	Reviewing CDR Discovery Requests and Response Prep	1.0	\$495.00	\$495.00
03/17/21	PA	Further research and drafting of responses to CDR interrogatories to Gardiner	0.5	\$550.00	\$275.00
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.8	\$550.00	\$440.00
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.3	\$550.00	\$165.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
03/18/21	PA	Complete researching and drafting responses to CDR document requests to Donte Gardiner/forward to Sam Leonard for initial factual review and investigation	0.8	\$550.00	\$440.00
03/18/21	PA	Begin researching and drafting responses to CDR document requests to Donte Gardiner	0.8	\$550.00	\$440.00
03/22/21	SL	Review Thrive Discovery Responses	1.1	\$495.00	\$519.75
03/23/21	BHC	Finalized stipulated protective agreement and sent to staff for submission to court [.2].	0.1	\$495.00	\$49.50
03/24/21	BHC	Discussed case management with co-counsel [.3]; email to co-counsel regarding same [.1].	0.2	\$495.00	\$99.00
03/24/21	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
03/24/21	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].	1.0	\$125.00	\$125.00
03/25/21	BHC	Worked with staff on discovery requests to Wojdak; emails to co-counsel regarding same [.1].	0.1	\$495.00	\$49.50
03/29/21	PA	Review Brad Fisher letter re: CDR discovery positions and email comments and strategy to co-counsel	0.4	\$550.00	\$220.00
03/29/21	SL	Reviewing CDR responses	1.0	\$495.00	\$495.00
03/29/21	SL	Drafting Correspondence to Co Counsel RE CDR Discovery	0.3	\$495.00	\$148.50
03/29/21	TS	Worked on notice of Rule 30(b)(6) deposition to Columbia Debt Recovery.	0.5	\$125.00	\$62.50

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Date	Initials	Narrative	Units	Rate	Value
03/30/21	PA	Email to co-counsel re: Rule 30(b)(6) notice for CDR and other issues	0.1	\$550.00	\$55.00
03/30/21	PA	Draft Rule 30(b)(6) notice for CDR, adapting notice from Jammeh v. HNN	1.0	\$550.00	\$550.00
03/31/21	SL	Call w client regarding discovery responses	1.1	\$495.00	\$544.50
04/02/21	PA	Review email from Sam Leonard re: draft discovery and make suggested changes/forward to Blythe Chandler	0.1	\$550.00	\$55.00
04/08/21	SL	Email to Thrive and CDR	0.2	\$495.00	\$99.00
04/09/21	BHC	Worked on Rule 30(b)(6) Notice to CDR [.3].	0.3	\$495.00	\$148.50
04/19/21	SL	Emailing with Client RE Discovery	0.2	\$495.00	\$99.00
04/26/21	BHC	Video conference with co-counsel regarding case management [.4].	0.3	\$495.00	\$148.50
04/26/21	SL	Telephone conference with co-counsel regarding same [.3].	0.3	\$495.00	\$148.50
04/26/21	SS	Drafting discovery responses	0.4	\$325.00	\$130.00
04/26/21	SS	Reviewed and analyzed Complaint.			
04/27/21	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
04/27/21	SL	Discovery call with Thrive	0.5	\$495.00	\$247.50
04/28/21	SL	Drafting discovery responses	2.6	\$495.00	\$1,287.00
04/28/21	SS	Reviewed and analyzed letter from opposing counsel on discovery from CDR.	0.3	\$325.00	\$97.50
04/28/21	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

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04/28/21	SS	Reviewed cases cited by opposing counsel in discovery letter.	0.9	\$325.00	\$292.50
04/28/21	SS	Commenced research on pre certification discovery requests.	0.4	\$325.00	\$130.00
04/28/21	SS	Drafted email regarding research question and scope of discovery letter;	0.3	\$325.00	\$97.50
04/28/21	SS	Researched issue of pre certification discovery in Washington state courts.	1.0	\$325.00	\$325.00
04/28/21	SS	Commenced drafting letter in response to opposing counsel regarding discovery RFPs No. 3, 4, 5, and 12.	0.4	\$325.00	\$130.00
04/28/21	SS	Reviewed Answer and Counterclaims to determine relevant class definitions.	0.2	\$325.00	\$65.00
04/29/21	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
04/29/21	HMR	Submitted motion to voluntary dismiss third-party defendant Jose Salas via ex parte twice.	0.5	\$125.00	\$62.50
04/29/21	PA	Review and respond to email from Sam Leonard re: discovery issue (bank records)	0.1	\$550.00	\$55.00
04/29/21	SS	Drafted letter to opposing counsel regarding RFPs No. 3, 4, 5, and 12.	0.5	\$325.00	\$162.50
04/29/21	SS	Edited draft letter to opposing counsel on RFPs 3, 4, 5, and 12.	0.3	\$325.00	\$97.50
04/29/21	SS	Drafted email to partner sending draft letter re discovery.	0.2	\$325.00	\$65.00

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04/30/21	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
04/30/21	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
05/03/21	SS	Reviewed CDR's responses to first set of interrogatories and requests for production.	0.5	\$325.00	\$162.50
05/05/21	SL	Reviewing Client email accounts	1.2	\$495.00	\$594.00
05/05/21	SL	Call with BC regarding emails	0.3	\$495.00	\$148.50
05/06/21	ET	Downloaded and organized client's emails [3]	3.0	\$125.00	\$375.00
05/07/21	BHC	Meeting with co-counsel regarding discovery, document review, and case management [.6].	0.3	\$495.00	\$148.50
05/07/21	SS	Edited draft discovery letter to CDR.	0.5	\$325.00	\$162.50
05/07/21	SS	Reviewed draft discovery correspondence and new requests for production to prepare for meeting.	0.6	\$325.00	\$195.00
05/07/21	SS	Video conference regarding draft discovery letters, draft requests for production.	0.5	\$325.00	\$162.50
05/10/21	SS	Reviewed discovery produced by CDR.	0.8	\$325.00	\$260.00
05/11/21	SS	Commenced reviewing disclosures by Columbia Debt Recovery - CollectOne handbook.	0.5	\$325.00	\$162.50
05/18/21	BHC	Video conference with co-counsel regarding client discovery responses and related matters [.7].	0.3	\$495.00	\$148.50

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05/19/21	JN	Reviewed email regarding production of client documents and prepared response to same. [1]	0.1	\$195.00	\$19.50
05/19/21	PA	Review and revise meet and confer letter to CDR	0.2	\$550.00	\$110.00
05/19/21	PA	Zoom meeting with Sam Leonard, Blythe Chandler and Sarah Smith	0.8	\$550.00	\$440.00
05/19/21	SL	Call with Co counsel	0.8	\$495.00	\$396.00
05/19/21	SL	Reviewing Pierce Emails located in TM search	0.8	\$495.00	\$396.00
05/19/21	SS	Finalized discovery letter to CDR; emailed same for sending.	0.3	\$325.00	\$97.50
05/19/21	SS	Reviewed suggested edits to discovery letter to CDR.	0.3	\$325.00	\$97.50
05/19/21	SS	Reviewed edits to discovery letter to CDR [2].	0.2	\$325.00	\$65.00
05/19/21		Edited discovery letter to CDR to include request for communications between it and Thrive.	0.2	\$325.00	\$65.00
05/19/21	SS	Video conference with counsel on case strategy and outstanding discovery.	0.3	\$325.00	\$97.50
05/19/21	TS	Finalized ltr to B. Fisher [2].	0.2	\$125.00	\$25.00
05/20/21	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
05/20/21	PA	Phone calls with Sam Leonard/Blythe Chandler re: client status	0.2	\$550.00	\$110.00
05/20/21	SL	Reviewing client records	1.6	\$495.00	\$792.00
05/20/21	SL	Call with co-counsel re discovery	0.4	\$495.00	\$198.00
05/20/21	SS	Reviewed suggested edits to discovery letter to CDR from co-counsel.	0.5	\$325.00	\$162.50
05/20/21	SS	Finalized edits to discovery letter to CDR.	0.3	\$325.00	\$97.50
05/20/21	SS	Reviewed and finalized discovery letters to Belkorp and CDR.	0.1	\$325.00	\$32.50
05/20/21	TS	Finalized ltr. to B. Fisher [1].	0.1	\$125.00	\$12.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/21/21	PA	Phone call with Donte Gardiner and Sam Leonard	0.2	\$550.00	\$110.00
05/21/21	SL	Call with client regarding discovery	0.4	\$495.00	\$198.00
05/21/21	SL	Call with co-counsel re discovery	0.3	\$495.00	\$148.50
05/24/21	BHC	Exchanged numerous emails with co-counsel regarding discovery matters and scheduled meet and confer [3].	0.1	\$495.00	\$49.50
05/25/21	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
05/25/21	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
05/25/21	SL	Emailing and talking with co-counsel on CDR discovery issues.	0.5	\$495.00	\$247.50
05/26/21	HMR	Worked on and finalized letter to Brad Fisher regarding discovery; emailed same to counsel and co-counsel.	0.4	\$125.00	\$50.00
05/26/21	PA	Review and respond to multiple emails regarding Brad Fisher complaints about our clients' discovery responses. Review Brad Fisher letter and our discovery	0.4	\$550.00	\$220.00
05/26/21	SS	Reviewed discovery letters in preparation for conferences.	0.3	\$325.00	\$97.50
05/27/21	BET	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

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/27/21	JN	Reviewed email from Mr. Fisher regarding meet and confer and responses to same.[.1]	0.1	\$195.00	\$19.50
05/27/21	PA	Review Brad Fisher email re: postponing phone call, draft proposed response, and circulate to co-counsel	0.1	\$550.00	\$55.00
05/27/21	PA	Zoom call to meet and confer with Brad Fisher re: CDR discovery issues. No charge b/c my microphone malfunctioned	0.0	\$550.00	\$0.00
05/27/21	PA	Zoom call with Beth Terrell, Sarah Smith and Sam Leonard re: CDR discovery and other issues	0.5	\$550.00	\$275.00
05/27/21	SL	CDR discovery call	1.0	\$495.00	\$495.00
05/27/21	SL	Reviewing client documents	0.8	\$495.00	\$396.00
05/27/21	SS	Prepared for discovery conference with CDR.	0.5	\$325.00	\$162.50
05/27/21	SS	Discovery conference with Mr. Fisher on Columbia Debt Recovery's discovery responses.	0.9	\$325.00	\$292.50
05/27/21	SS	Video conference with co-counsel to debrief on discovery call with Columbia Debt Recovery.	0.5	\$325.00	\$162.50
05/28/21	JN	Reviewed email from Mr. Fisher regarding plaintiffs' depositions and response to same.[.1];	0.1	\$195.00	\$19.50
05/28/21	JN	Reviewed emails regarding review of client emails and responses to same.[.1].	0.1	\$195.00	\$19.50
05/28/21	PA	Review and edit confirming letter to Brad Fisher re: CDR discovery	0.3	\$550.00	\$165.00
05/28/21	SL	Drafting discovery letter and reviewing CDR discovery	0.8	\$495.00	\$396.00
05/28/21	SS	Email to Mr. Fisher on Columbia Debt Recovery discovery call.	0.9	\$325.00	\$292.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/28/21	SS	Incorporated suggestions into email to Brad Fisher on discovery call.	0.4	\$325.00	\$130.00
05/28/21	SS	Incorporated edits into email to Brad Fisher on discovery call.	0.2	\$325.00	\$65.00
05/28/21	SS	Finalized emails and circulated for review.	0.2	\$325.00	\$65.00
06/01/21	SL	Reviewing Gardiner Emails	0.6	\$495.00	\$297.00
06/02/21	BHC	Telephone conference with co-counsel regarding client email production [5].	0.5	\$495.00	\$247.50
06/02/21	PA	Phone call with Sam Leonard re case status and possible amended pleadings	0.8	\$550.00	\$440.00
06/02/21	PA	Phone call with Blythe Chandler and Sam Leonard re: counterclaimant depositions and amending the answer	0.9	\$550.00	\$495.00
06/02/21	SL	Call with Co-counsel RE Discovery, depositions and amendment.	1.0	\$495.00	\$495.00
06/02/21	SS	Reviewed letter from OC on discovery conference and disputes.	0.3	\$325.00	\$97.50
06/03/21	BHC	Discussed client deposition scheduling with co-counsel [5]. Worked with staff on document production [2].	0.3	\$495.00	\$148.50
06/03/21	PA	Review and draft lengthy response to Bard Fisher June 2, 2021 letter re: discovery, including researching	1.2	\$550.00	\$660.00
06/03/21	SL	Review Gardiner Email	2.1	\$495.00	\$1,039.50
06/03/21	SS	Reviewed and analyzed letter from opposing counsel following up on discovery call.	0.3	\$325.00	\$97.50
06/03/21	SS	Reviewed draft email from co-counsel.	0.3	\$325.00	\$97.50
06/04/21	BHC	Reviewed discovery correspondence from Mr. Fisher; email to co-counsel regarding same [4].	0.4	\$495.00	\$198.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
06/04/21	SL	Emailing with co-counsel and opposing counsel regarding deposition scheduling	0.2	\$495.00	\$99.00
06/07/21	BHC	Worked on primary witness disclosure [.8].	0.4	\$495.00	\$198.00
06/07/21	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
06/07/21	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
06/08/21	BET	Discussed response to Mr. Fisher's letter with Ms. Chandler [.2]	0.2	\$550.00	\$110.00
06/08/21	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
06/08/21	BHC	Worked on Rule 30(b)(6) notice [.8].	0.8	\$495.00	\$396.00
06/08/21	PA	Review and comment on draft letter to Brad Fisher re: discovery	0.1	\$550.00	\$55.00
06/09/21	BHC	Worked on letter to Mr. Fisher regarding discovery matters and sent same [.1].	1.0	\$495.00	\$495.00
06/09/21	BHC	Video conference with co-counsel regarding case management [.6].	0.3	\$495.00	\$148.50
06/09/21	PA	Conference call with Sarah Smith, Beth Terrell, Blythe Chandler and Sam Leonard re: case status, discovery and planning	0.4	\$550.00	\$220.00
06/09/21	SL	Strategy meeting - Discovery and class cert	0.8	\$495.00	\$396.00
06/09/21	SL	Call with client regarding discovery	0.8	\$495.00	\$396.00
06/09/21	SL	Reviewing CDR Discovery Responses	0.4	\$495.00	\$198.00

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
06/09/21	SS	Video conference with co-counsel.	0.4	\$325.00	\$130.00
06/10/21	SL	Editing discovery letter to CDR	0.2	\$495.00	\$99.00
06/10/21	SL	Call with PA RE: Class Reps CDR	0.2	\$495.00	\$99.00
06/10/21	SS	Researched futlity standard for motions to amend [1]; edited motion to amend [6].	0.8	\$325.00	\$260.00
06/10/21	SS	Reviewed Answer and Counterclaim Defendants' Answers [6]; motion to amend [1.4].	1.0	\$325.00	\$325.00
06/11/21	HMR	Worked on declaration of Blythe H. Chandler in support of motion for leave to amend answer.	0.1	\$125.00	\$12.50
06/11/21	SS	Research on futlity standard for motion to amend [5]; motion to amend drafting [5].	0.5	\$325.00	\$162.50
06/14/21	BHC	Worked on case schedule issues [2]. Worked on motion for leave to amend answer and counterclaims [2].	0.2	\$495.00	\$99.00
06/14/21	SS	Incorporated edits into motion to amend.	0.2	\$325.00	\$65.00
06/16/21	BHC	Responded to Mr. Fisher's request to extend time to provide supplemental class data [2].	0.2	\$495.00	\$99.00
06/17/21	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
06/18/21	BHC	Email to Mr. Fisher regarding client supplement [1].	0.1	\$495.00	\$49.50
06/18/21	SL	Preparing client supplemental responses	1.8	\$495.00	\$891.00
06/22/21	ET	Reviewed production for personal information to redact [0.5]	0.5	\$125.00	\$62.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
06/22/21	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
		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
06/24/21	SL	Preparing Gardiner Supplemental Production	0.8	\$495.00	\$396.00
06/24/21	SL	Call with client regarding discovery	0.5	\$495.00	\$247.50
06/28/21	SL	Reviewing Motion to Continue and Decl.	0.2	\$495.00	\$99.00
06/29/21	SS	Edited motion to amend case schedule.	0.3	\$325.00	\$97.50
06/30/21	SS	Edited draft motion to amend case schedule [1.4]; email circulating draft motion to amend [:1].	0.7	\$325.00	\$227.50
07/01/21	PA	Review and respond to email from Sam Leonard re: claims against CDR	0.1	\$550.00	\$55.00
07/01/21	SL	Emailing with clients	0.3	\$495.00	\$148.50
07/01/21	SL	Emailing with co-counsel regarding MTA	0.2	\$495.00	\$99.00
07/02/21	PA	Review emails from Brad Fisher regarding amended complaint and exchange multiple emails with co-counsel re: how to respond.	0.1	\$550.00	\$55.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
07/02/21	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
07/26/21	BHC	Email to Mr. Fisher regarding deposition schedule [.2].	0.2	\$495.00	\$99.00
08/03/21	SL	Call with BC on status and next steps	0.3	\$495.00	\$148.50
08/05/21	BHC	Exchanged emails with co-counsel regarding case strategy and discovery [.2].	0.1	\$495.00	\$49.50
08/05/21	JAL	Worked on drafting deposition notice [1.1].	1.1	\$150.00	\$165.00
08/05/21	SL	Reviewing Thrive discovery responses and emailing with PA	0.1	\$495.00	\$49.50
08/05/21	SL	Emailing with Co-counsel RE: [External] Pierce v. Thrive Communities Moveout Statement Revi	0.2	\$495.00	\$99.00
08/06/21	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
08/10/21	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
08/11/21	BHC	Worked on amended Rule 30(b)(6) notice to CDR for service [.1].	0.1	\$495.00	\$49.50
08/11/21	BHC	Exchanged emails with co-counsel regarding client deposition scheduling [.2].	0.2	\$495.00	\$99.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
08/11/21	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
08/12/21	BHC	Revised Rule 30(b)(6) notice and approved same for service [.2]. Reviewed Columbia Debt Recovery's objections to 30(b)(6) deposition notice topics [.2].	0.2	\$495.00	\$99.00
08/20/21	SS	Exchanged emails with Mr. Fisher regarding remote deposition exhibit protocol [.2].	0.2	\$325.00	\$65.00
08/27/21	BHC	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
08/31/21	SL	Gardiner Deposition Prep	1.6	\$495.00	\$792.00
08/31/21	SL	Dep prep	1.5	\$495.00	\$742.50
09/01/21	SL	Reviewing production from CDR	1.0	\$495.00	\$495.00
09/01/21	SL	Legal Research Joint Defense Privilege	0.8	\$495.00	\$396.00
09/02/21	PA	Followed entire deposition of Jordan Pierce but am only billing an hour for my comments and assistance to Sam Leonard.	1.0	\$550.00	\$550.00
09/02/21	SL	Jordan Pierce Deposition	5.0	\$495.00	\$2,475.00
09/02/21	SL	Jordan Pierce Deposition Prep	1.2	\$495.00	\$594.00
09/02/21	SL	Deposition Prep	1.1	\$495.00	\$544.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
09/03/21	SL	Dep. Donte Gardiner	4.2	\$495.00	\$2,079.00
09/03/21	SL	Reviewing client emails	0.6	\$495.00	\$297.00
09/05/21	BHC	Worked on CDR Rule 30(b)(6) outline.	5.9	\$495.00	\$2,920.50
09/06/21	PA	Review CDR deposition outline and email comments to co-counsel	0.2	\$550.00	\$110.00
09/07/21	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 [.5].	2.1	\$495.00	\$1,039.50
09/07/21	JJB	Worked on deposition preparation.	1.7	\$175.00	\$297.50
09/07/21	SL	Editing and drafting CDR Dep Questions.	1.6	\$495.00	\$792.00
09/07/21	SL	Reviewing letter from Brad Fisher and drafting proposed response.	0.3	\$495.00	\$148.50
09/08/21	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
09/08/21	JJB	Telephone conferences regarding deposition exhibits; prepared deposition exhibits.	0.5	\$175.00	\$87.50
09/08/21	SL	CDR Dep.	5.5	\$495.00	\$2,722.50
09/08/21	SS	Observed Rule 30(b)(6) deposition of Columbia Debt Recovery [.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].	3.0	\$325.00	\$975.00
09/09/21	PA	Conference call with co-counsel to discuss strategy	0.5	\$550.00	\$275.00
09/09/21	SL	Next steps and status	0.5	\$495.00	\$247.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
09/09/21	SS	Video conference with co-counsel following 30(b)(6) deposition [6].	0.6	\$325.00	\$195.00
09/16/21	BHC	Draft stipulation and proposed order to amend class certification briefing schedule; circulated same to all counsel [1.5]. Discussed strategy with co- counsel [1.1].	0.8	\$495.00	\$396.00
09/16/21	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
09/17/21	BHC	Worked on subpoena to Saint Newton [2].	0.2	\$495.00	\$99.00
09/17/21	JAL	Worked on drafting deposition subpoena [1.6].	1.6	\$150.00	\$240.00
09/20/21	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
09/20/21	JAL	Worked on drafting and serving subpoena [1.9].	1.9	\$150.00	\$285.00
09/21/21	JAL	Worked on loading production [0.9].	0.9	\$150.00	\$135.00
09/29/21	SL	Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	1.2	\$495.00	\$594.00
09/30/21	SL	Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	1.2	\$495.00	\$594.00
10/04/21	SS	Reviewed letter from counsel for Saint Newton [1].	0.1	\$325.00	\$32.50
10/11/21	AMS	Strategy conference about class certification, worked on motion [7.3].	3.6	\$550.00	\$1,980.00
10/11/21	PA	Review and respond to emails regarding briefing rules	0.1	\$550.00	\$55.00
10/11/21	SL	Reviewing transcript of Gardiner Dep	1.3	\$495.00	\$643.50
10/12/21	AMS	Worked on class certification motion, strategy conferences [9.8].	4.9	\$550.00	\$2,695.00
10/12/21	BHC	Worked on motion for class certification.	2.0	\$495.00	\$990.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
10/12/21	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
10/12/21	PA	Phone call with co-counsel re: class certification issues	0.5	\$550.00	\$248.00
10/13/21	AMS	Worked on class certification motion and supporting declarations [8.8].	4.4	\$550.00	\$2,420.00
10/13/21	BHC	Worked on Plaintiffs' motion for class certification [5.4].	2.7	\$495.00	\$1,336.50
10/14/21	AMS	Worked on class certification motion and supporting documents [7.2].	3.6	\$550.00	\$1,980.00
10/14/21	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
10/14/21	HB	Worked on declaration and exhibits in support of motion for class certification [8.2].	4.1	\$150.00	\$615.00
10/14/21	PA	Review and edit class cert brief, including emailing preliminary comments to co-counsel	0.3	\$550.00	\$165.00
10/14/21	PA	Make edits and corrections to class cert. brief and email to co-counsel	0.3	\$550.00	\$138.00
10/14/21	SL	Drafting Declarations	2.1	\$495.00	\$1,039.50
10/14/21	SL	Call with client regarding declarations	0.3	\$495.00	\$148.50
10/15/21	AMS	Worked on class certification motion and supporting documents [7.6].	3.8	\$550.00	\$2,090.00
10/15/21	BHC	Telephone conference with Mr. Fisher regarding confidentiality designations [1].	0.1	\$495.00	\$49.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
10/15/21	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
10/15/21	SL	Editing motion for cert. 9, review and editing declarations. 3	0.9	\$495.00	\$445.50
10/18/21	HB	Prepared sealed documents for delivery to the Judge's Mailroom [7].	0.3	\$150.00	\$45.00
10/22/21	SS	Reviewed responses to motion to seal and related documents [1]; reviewed proposed discovery requests [2].	0.6	\$325.00	\$195.00
10/25/21	SS	Reply to Columbia Debt Recovery motion to seal exhibits ISO motion for class certification.	2.0	\$325.00	\$650.00
10/25/21	SS	Reviewed and analyzed responses to motion to seal [1]; researched case-law on motions to seal [1].	1.0	\$325.00	\$325.00
10/26/21	BHC	Worked on replies in support of motions to seal or file in open court.	0.3	\$495.00	\$148.50
10/26/21	SS	Proofread replies.	0.3	\$325.00	\$97.50
11/12/21	SS	Reviewed responses to class certification motion.	1.0	\$325.00	\$325.00
11/15/21	SS	Outlined potential evidentiary and legal arguments for reply to CDR response to class cert motion.	1.0	\$325.00	\$325.00
11/16/21	SS	Email summarizing potential arguments for replies ISO motion for class certification.	0.5	\$325.00	\$162.50
11/17/21	SS	Reviewed CDR response brief [5]; outlined reply to CDR [1.7].	2.3	\$325.00	\$747.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
11/18/21	SS	Research for reply to CDR response to class certification [2.1]; outlined reply [5].	2.6	\$325.00	\$845.00
11/18/21	SS	Outlined reply to CDR response to motion for class certification [7]; commenced drafting reply [4].	1.1	\$325.00	\$357.50
11/18/21	SS	Reply to CDR response to class certification.	0.5	\$325.00	\$162.50
11/18/21	SS	Reply to CDR opposition to class certification.	0.8	\$325.00	\$260.00
11/19/21	SS	Reply to CDR opposition to motion for class certification.	1.7	\$325.00	\$552.50
11/22/21	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
11/22/21	SS	CDR reply brief.	1.5	\$325.00	\$487.50
11/22/21	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
11/23/21	SS	CDR reply brief in support of class certification [4.3].	4.3	\$325.00	\$1,397.50
11/24/21	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
11/24/21	PA	Zoom call with co-counsel re; strategy for class cert. motion reply briefs	0.5	\$550.00	\$248.00
11/24/21	SS	Reply to CDR opposition to class certification.	1.5	\$325.00	\$487.50
11/24/21	SS	Video conference with co-counsel on class cert reply strategy.	0.4	\$325.00	\$130.00
11/29/21	BHC	Worked on reply in support of certification on CDR classes [1.3].	1.3	\$495.00	\$643.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
11/29/21	BHC	Telephone conference with co-counsel regarding legal research related to reply briefs [1.2].	0.2	\$495.00	\$99.00
11/29/21	AAA	Personal conference regarding research issues for class certification replies [0.2]; worked on research issues [3.4].	3.6	\$425.00	\$1,530.00
11/29/21	SS	Reviewed and incorporated edits to CDR reply.	1.4	\$325.00	\$455.00
11/30/21	AAA	Completed research regarding for reply briefs in support of class certification [1.8]; email correspondence regarding same [0.2].	2.0	\$425.00	\$850.00
11/30/21	SS	Edits to CDR reply.	0.7	\$325.00	\$227.50
11/30/21	SS	CDR reply brief.	1.8	\$325.00	\$585.00
11/30/21	SS	CDR reply brief.	0.7	\$325.00	\$227.50
12/01/21	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
12/01/21	AAA	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
12/01/21	SS	CDR reply brief.	1.0	\$325.00	\$325.00
12/02/21	AMS	Worked on class certification replies, strategy conference, drafted revised proposed order [5.8].	1.9	\$550.00	\$1,045.00
12/02/21	HB	Worked on declaration and exhibits in support of class cert reply [2.0].	0.7	\$150.00	\$105.00
12/02/21	PA	Review and revise reply memo re: CDR opposition to class certification.	0.7	\$550.00	\$385.00
12/03/21	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

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
12/03/21	HB	Worked on finalizing declaration, exhibits, and other supporting documents for class cert reply [4].	0.1	\$150.00	\$15.00
12/03/21	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
12/03/21	SL	Reviewing and editing briefs.	0.4	\$495.00	\$198.00
12/17/21	BHC	Exchanged emails with all counsel regarding hearing date for motion for class certification [4].	0.2	\$495.00	\$99.00
01/03/22	BHC	Email to Judge Galvan's chambers requesting date for class certification hearing [2].	0.1	\$495.00	\$49.50
01/14/22	BHC	Reviewed order on change of judge and exchanged emails with co-counsel regarding same [2].	0.1	\$495.00	\$49.50
01/21/22	BHC	Worked with staff and co-counsel on production of working copies for Judge McCoy [6].	0.2	\$495.00	\$99.00
01/21/22	ET	Created binders of working copies for judge, and arranged for delivery to court on Monday [3,5]	1.2	\$125.00	\$150.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
02/02/22	BET	Exchanged emails with Ms. Chandler regarding scheduling oral argument on class certification [1.2]. Discussed class certification argument scheduling with Ms. Terrell [1.2].	0.4	\$550.00	\$220.00
02/02/22	BHC	Exchanged emails with Ms. Terrell regarding scheduling oral argument on class certification [1.2].	0.1	\$495.00	\$49.50
02/02/22	BHC	Discussed class certification argument scheduling with Ms. Terrell [1.2].	0.1	\$495.00	\$49.50
02/21/22	BET	Telephone conference with Ms. Chandler regarding class certification argument outline [1.5].	0.5	\$550.00	\$275.00
02/21/22	BHC	Worked on oral argument outline [4.8]. Telephone conference with Ms. Terrell regarding class certification argument outline [1.5].	1.7	\$495.00	\$841.50
02/22/22	AMS	Class certification hearing prep [1.4].	0.4	\$550.00	\$220.00
02/22/22	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
02/22/22	BHC	Email memo to co-counsel regarding class certification hearing preparation [1.5]. Class certification preparation meeting with co-counsel [1.1].	0.5	\$495.00	\$247.50
02/22/22	HB	Gathered documents for class certification preparation [1.2].	0.1	\$150.00	\$15.00
02/23/22	BET	Prepared for argument on motion for class certification [4.8]	2.4	\$550.00	\$1,320.00
02/23/22	SS	Case summaries for oral argument prep.	1.1	\$325.00	\$357.50
02/24/22	BET	Prepared for argument on motion for class certification [6.6]	3.3	\$550.00	\$1,815.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
02/25/22	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
02/25/22	SL	Hearing - Motion for Certification	0.5	\$495.00	\$247.50
02/25/22	SL	Call RE Motion for Certification Hearing	1.5	\$495.00	\$742.50
02/28/22	BHC	Checked docketing for appeal deadlines related to denial of class certification [3].	0.1	\$495.00	\$49.50
03/01/22	BHC	Read class certification hearing transcript; discussed same with co-counsel [9].	0.4	\$495.00	\$198.00
03/01/22	SS	Reviewed and analyzed transcript of class certification hearing.	0.4	\$325.00	\$130.00
03/02/22	BHC	Video conference with co-counsel to discuss strategy in light of class certification ruling [6].	0.3	\$495.00	\$148.50
03/02/22	PA	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	0.5	\$550.00	\$275.00
03/02/22	PA	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	0.5	\$550.00	\$275.00
03/28/22	PA	Review and respond to email from Blythe Chandler re: appeal and settlement.	0.1	\$550.00	\$28.00
03/28/22	PA	Review and respond to email from Sam Leonard re: settlement offer and appeal.	0.1	\$550.00	\$28.00
04/08/22	BHC	Worked with staff on filing notice of request for discretionary review [4].	0.2	\$495.00	\$99.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/14/22	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
04/18/22	AMS	Worked on motion for discretionary review, related research, strategy conference [7.6].	2.5	\$550.00	\$1,375.00
04/19/22	AMS	Worked on motion for discretionary review, related research [4.7].	1.6	\$550.00	\$880.00
04/20/22	AMS	Worked on motion for discretionary review, related research [6.4].	2.1	\$550.00	\$1,155.00
04/22/22	AMS	Worked on motion for discretionary review [7.8].	2.6	\$550.00	\$1,430.00
04/25/22	AMS	Worked on motion for discretionary review, related research [9.2].	3.0	\$550.00	\$1,650.00
04/25/22	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
04/25/22	SS	Drafted introduction, facts section of motion to stay.	1.3	\$325.00	\$422.50
04/25/22	SS	Researched standard of review for motion to stay pending appeal.	1.2	\$325.00	\$390.00
04/25/22	SS	Motion to stay pending resolution of motion for discretionary review argument section.	1.3	\$325.00	\$422.50
04/26/22	AMS	Worked on motion for discretionary review, related research, worked on appendix, related strategy conference [9.2].	3.0	\$550.00	\$1,650.00
04/27/22	BHC	Worked on motion for discretionary review [7]. Worked on motion to stay [5].	0.4	\$495.00	\$198.00
04/27/22	JN	Worked on clerk's papers for motion for discretionary review.[4]	0.1	\$195.00	\$19.50
04/27/22	SS	Motion to stay.	0.5	\$325.00	\$162.50
04/27/22	SS	Declaration in support of motion to stay.	0.3	\$325.00	\$97.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/28/22	AA	Worked on appendix for motion to stay.	0.3	\$125.00	\$37.50
04/28/22	JN	Worked on motion for discretionary review[2]	0.7	\$195.00	\$136.50
04/28/22	JN	Continued working on appendix to motion for discretionary review	0.9	\$195.00	\$175.50
04/28/22	PA	Review and revise motion for discretionary review	0.8	\$550.00	\$413.00
04/28/22	SL	Editing Motion for Discretionary Review	0.9	\$495.00	\$445.50
04/29/22	AMS	Finalized motion for discretionary review and appendix [6.6].	2.2	\$550.00	\$1,210.00
04/29/22	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
04/29/22	JAL	Worked on appendix index [2.1].	0.7	\$150.00	\$105.00
05/02/22	BHC	Worked on motion to stay; email to memo to co-counsel regarding same.	0.1	\$495.00	\$49.50
05/09/22	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
05/09/22	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
05/10/22	EAA	Email correspondence regarding reply in support of motion to stay.	0.3	\$425.00	\$127.50
05/10/22	SS	Continued review of sample briefing on issue of individual liability in FDCPA, CPA claims.	0.3	\$325.00	\$97.50
05/10/22	SS	Reviewed sample briefing on individual liability [6]; reviewed case-law for reply ISO motion to stay [7].	1.3	\$325.00	\$422.50
05/11/22	SS	Edited reply ISO motion to stay pending resolution of motion for discretionary review.	1.3	\$325.00	\$422.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/18/22	BHC	Exchanged emails with co-counsel and opposing counsel regarding potential stipulation involving Wojdak [2].	0.2	\$495.00	\$99.00
05/27/22	BHC	Exchanged emails with co-counsel and counsel for Wojdak regarding potential stay [2].	0.2	\$495.00	\$99.00
06/03/22	BHC	Exchanged emails with Mr. Fisher regarding stipulation to stay [1].	0.1	\$495.00	\$49.50
06/06/22	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
06/06/22	SS	Stipulation re stay of proceedings against William Wojdak pending resolution of motion for discretionary review.	0.5	\$325.00	\$162.50
06/10/22	AMS	Worked on replies to three oppositions to motion for discretionary review [9.4].	3.1	\$550.00	\$1,705.00
06/11/22	AMS	Worked on responses to three oppositions to motion for discretionary review [15.2].	5.0	\$550.00	\$2,750.00
06/12/22	AMS	Worked on discretionary review replies [3.0].	1.0	\$550.00	\$550.00
06/13/22	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
06/13/22	SS	Email to B. Fisher re stip.	0.2	\$325.00	\$65.00
06/13/22	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
06/13/22	SS	Created clean copies of stip and proposed order [1]; reviewed and approved finals for filing [2].	0.3	\$325.00	\$97.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
06/14/22	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
06/16/22	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
06/23/22	BHC	Worked in reply in support of motion for discretionary review [1.5].	0.5	\$495.00	\$247.50
06/23/22	PA	Review and revise reply memo on motion for discretionary review	0.3	\$550.00	\$165.00
06/27/22	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
06/27/22	SS	Reviewed final reply iso motion for discretionary review. Stipulation extending stay pending resolution of mtn for discretionary review.	0.2	\$325.00	\$65.00
08/19/22	SS	Revised draft stipulation on case schedule [2]; discussed same with Ms. Terrell [2].	0.7	\$325.00	\$227.50
08/22/22	BHC	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
08/23/22	SS	Email recirculating original stipulation [2]; updated stipulation and proposed order re same [2].	0.4	\$325.00	\$130.00
10/19/22	BHC	Video conference with co-counsel regarding case management [6].	0.3	\$495.00	\$148.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
10/19/22	PA	Phone call with Sam Leonard and Blythe Chandler re: denial of discretionary review and strategy going forward.	0.5	\$550.00	\$248.00
10/19/22	SL	Call with co-counsel RE Next Steps	0.6	\$495.00	\$297.00
10/20/22	SL	Next Steps - Call with PA	0.4	\$495.00	\$198.00
10/25/22	BHC	Video conference with co-counsel regarding case management [.5].	0.2	\$495.00	\$99.00
10/25/22	PA	Phone call with co-counsel re: strategy for status conference and further action	0.3	\$550.00	\$138.00
10/26/22	BHC	Discussed case management conference with Mr. Leonard [.1].	0.1	\$495.00	\$49.50
10/26/22	SL	Reviewing case history and preparing for status conference.	0.6	\$495.00	\$272.25
10/27/22	BHC	Prepared for status conference with Court [.2].	0.1	\$495.00	\$49.50
10/28/22	BHC	Status conference with Court [.2]. Telephone call with Mr. Leonard regarding same [.3].	0.2	\$495.00	\$99.00
10/28/22	SL	Status conference	0.2	\$495.00	\$74.25
11/03/22	PA	Begin discovery review to prepare for new class certification effort/email questions to co-counsel.	1.0	\$550.00	\$550.00
11/14/22	BHC	Analyzed issues and exchanged emails with co-counsel regarding potential amended complaint and case management [.3].	0.1	\$495.00	\$49.50
11/17/22	SL	Settlement offer	0.3	\$495.00	\$148.50
11/21/22	PA	Phone calls with Sam Leonard regarding responding to Thrive/CDR settlement offer	0.4	\$550.00	\$220.00
11/21/22	SL	Calls regarding settlement offer and next steps	0.5	\$495.00	\$247.50
11/21/22	SL	Calls regarding settlement offer and next steps	0.4	\$495.00	\$198.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
11/22/22	SL	Drafting letter to HIM regarding outstanding Thrive records related to CDR's claim against clients	0.6	\$495.00	\$297.00
		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
12/05/22	BHC	Leonard regarding same [.4].	0.1	\$495.00	\$49.50
12/21/22	SL	Emailing with co-counsel RE Status of discovery	1.0	\$495.00	\$470.25
12/28/22	SL	Editing TAC			
		Drafting email to PA regarding motion to compel and law section of brief.	0.3	\$495.00	\$123.75
01/03/23	SL	Call RE Move to Amend	0.2	\$495.00	\$99.00
01/03/23	SL	Drafting Motion to amend	0.5	\$495.00	\$247.50
01/04/23	SL	Drafting Motion to amend	0.8	\$495.00	\$371.25
01/06/23	SL	Editing Motion to Amend, Amended Counterclaims	0.9	\$495.00	\$445.50
		Review and respond to email from Brad Fisher re: proposed amended class counterclaim.	0.3	\$550.00	\$165.00
01/10/23	PA	Email co-counsel re: filing motion for leave to amend and discovery	0.1	\$550.00	\$28.00
		Email to Brad fisher re: stipulating to filing of 3rd Amended Counterclaim	0.1	\$550.00	\$55.00
01/10/23	PA	Drafting Reply ISO Motion to Amend	1.6	\$495.00	\$792.00
01/23/23	SL	Review and organize prior discovery responses from CDR.	0.7	\$550.00	\$385.00
01/30/23	PA	Zoom call re: CDR discovery with co-counsel	0.3	\$550.00	\$165.00
01/30/23	SL	Call RE CDR Strategy	0.4	\$495.00	\$198.00
01/31/23	PA	Email to Brad Fisher re: prior CDR discovery objections	0.5	\$550.00	\$275.00
01/31/23	PA	Review and organize prior CDR discovery responses	1.0	\$550.00	\$550.00
		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.			
02/01/23	PA		2.1	\$550.00	\$1,155.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
02/03/23	PA	Draft second set of discovery requests for CDR, including reviewing prior discovery responses in this case and Jammeh v. HNN.	1.4	\$550.00	\$770.00
02/05/23	PA	Review discovery and complaint and start draft of discovery to do list	1.0	\$550.00	\$550.00
02/06/23	PA	Begin drafting motion to compel CDR to produce documents	0.9	\$550.00	\$495.00
02/06/23	PA	Review some of the prior discovery and email to co-counsel re: discovery issues	0.4	\$550.00	\$220.00
02/07/23	BHC	Video conference with co-counsel regarding discovery matters [.3].	0.1	\$495.00	\$49.50
02/07/23	PA	Continued drafting of motion to compel CDR to produce	1.4	\$550.00	\$770.00
02/07/23	PA	Zoom call re: discovery and other issues with Sam Leonard and Blythe Chandler	0.3	\$550.00	\$165.00
02/07/23	SL	Emails RE CDR	0.3	\$495.00	\$148.50
02/08/23	PA	Further drafting of motion to compel v. CDR, including emails with co-counsel	0.8	\$550.00	\$440.00
02/08/23	PA	Review email from Jeffery Hasson, speak with Blythe Chandler, send responsive email to all defendants	0.4	\$550.00	\$220.00
02/09/23	PA	Complete initial researching and draft of Motion to Compel CDR	3.0	\$550.00	\$1,650.00
02/14/23	PA	Phone call with Sam Leonard re: discovery phone call and new discovery to CDR and Thrive	0.1	\$550.00	\$55.00
02/14/23	PA	Meet and confer phone call with CDR (Jeff Hasson, Brad Fisher)	0.4	\$550.00	\$220.00

Exhibit "A"

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EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
02/14/23	SL	Meet and Confer with BF and JH RE CDR discovery responses	0.5	\$495.00	\$247.50
02/16/23	SL	Editing 4th RFPs to Thrive	0.1	\$495.00	\$49.50
02/16/23	SL	Editing Motion to Compel and Discovery to Thrive	1.4	\$495.00	\$693.00
02/17/23	PA	Review and annotate email from Brad Fisher re: document production/forward to Sam Leonard	0.4	\$550.00	\$220.00
02/17/23	PA	Review and incorporate Sam Leonard revisions, select and organize exhibits and draft supporting declaration consistent with the final version of the motion.	2.3	\$550.00	\$1,265.00
02/20/23	PA	Draft response to Brad Fisher letter about discovery responses.	1.1	\$550.00	\$605.00
02/24/23	PA	Emails to counsel for Thrive and CDR re: filing a response	0.1	\$550.00	\$55.00
02/27/23	PA	Review and edit final version of discovery letter to Brad Fisher and Jeffery Hasson	0.2	\$550.00	\$110.00
02/27/23	PA	Phone call with Sam Leonard re: CDR discovery issues	0.1	\$550.00	\$55.00
02/27/23	PA	Review and edit meet and confer letter to CDR	0.3	\$550.00	\$165.00
02/27/23	SL	Reviewing Discovery and Drafting Letter to CDR RE Discovery	1.8	\$495.00	\$891.00
02/28/23	PA	Review and respond to email from Jeff Hasson re: resolving outstanding discovery disputes.	0.2	\$550.00	\$110.00
03/03/23	PA	Draft email confirming meet and confer phone call and including other discovery issues	0.7	\$550.00	\$385.00
03/06/23	PA	Review and respond to email from Blythe Chandler re: discovery order and very preliminary data results.	0.2	\$550.00	\$110.00
03/07/23	PA	Email to Jeff Hasson re: CDR discovery	0.1	\$550.00	\$55.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
03/10/23	PA	Quick review of CDR discovery responses and spreadsheet and review and respond to email from Sam Leonard regarding this discovery	0.3	\$550.00	\$165.00
03/10/23	SL	Reviewing CDR Discovery Responses	1.0	\$495.00	\$495.00
03/13/23	PA	Review discovery responses and email opposing counsel to meet and confer	0.2	\$550.00	\$110.00
03/14/23	PA	Email to Blythe Chandler and Beth Terrell re: discovery status.	0.2	\$550.00	\$110.00
03/14/23	PA	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.	0.4	\$550.00	\$220.00
03/14/23	PA	Research and begin revised draft of motion to compel v. CDR	1.2	\$550.00	\$660.00
03/14/23	PA	Review data compilation and respond to email from Jeff Hasson re: scheduling meet and confer phone call.	0.3	\$550.00	\$165.00
03/15/23	JR	Met and conferred with CDR regarding discovery requests [.4]: drafted and revised summary of meet and confer to send to CDR [.6].	1.0	\$275.00	\$275.00
03/15/23	PA	Review discovery and draft notes in preparation for meet and confer phone call	0.5	\$550.00	\$275.00
03/15/23	PA	Draft confirming letter re: meet and confer with Jeff Hasson, and send to Jasmin Rezale for review and editing	0.5	\$550.00	\$275.00
03/15/23	PA	Meet and confer phone call with Jeff Hasson and Jasmin Rezale	0.4	\$550.00	\$220.00
03/16/23	PA	Draft motion to compel CDR	2.9	\$550.00	\$1,595.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
03/19/23	PA	Complete initial draft of Motion to Compel v Columbia Debt Recovery/select and organize exhibits.	3.2	\$550.00	\$1,760.00
03/19/23	PA	Review Jeff Hasson email regarding CDR's practices, review deposition transcript and other evidence and send response	0.8	\$550.00	\$440.00
03/20/23	BHC	Video conference with co-counsel regarding case management and discovery progress [.5].	0.2	\$495.00	\$99.00
03/20/23	PA	Conference call with Blythe Chandler and Jasmin Resale re: case status	0.5	\$550.00	\$275.00
03/21/23	BHC	Worked on motion to compel CDR documents and data [1].	1.0	\$495.00	\$495.00
03/21/23	PA	Draft Declaration of Paul Arons in Support of Motion to Compel CDR Discovery	0.8	\$550.00	\$440.00
03/22/23	BHC	Reviewed and approved motion to compel CDR production and related documents for filing [.4].	0.4	\$495.00	\$198.00
03/22/23	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
03/27/23	PA	Review and respond to email from Sam Leonard re: case status	0.1	\$550.00	\$55.00
03/28/23	BHC	Video conference with co-counsel regarding discovery management [1].	0.3	\$495.00	\$148.50
03/28/23	JR	Case management and strategy conference with co-counsel [1.1].	0.4	\$275.00	\$110.00
03/28/23	PA	Conference call with Blythe Chandler and Sam Leonard re: case status	0.6	\$550.00	\$303.00

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
03/28/23	SL	Cert Motion Strategy and Discovery CDR and Thrive	0.5	\$495.00	\$247.50
03/29/23	PA	Review CDR opposition to motion to compel discovery, research and being drafting reply brief	1.0	\$550.00	\$550.00
03/29/23	SL	Reviewing response to MTC and discovery in Jammeh for information on CDR's practices	1.1	\$495.00	\$544.50
03/30/23	PA	Email to Jeff Hasson re: correct referral date for Thrive accounts	0.1	\$550.00	\$55.00
03/30/23	PA	Complete first draft of memo in reply re: Mot to Compel CDR discovery	6.0	\$550.00	\$3,300.00
03/30/23	SL	Reviewing motion and facts in preparation of response.	3.2	\$495.00	\$1,584.00
03/31/23	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
03/31/23	BHC	Exchanged email with co-counsel regarding incorrect filing [.1]; telephone call with co-counsel regarding same [.1].	0.2	\$495.00	\$99.00
03/31/23	PA	Draft supplemental declaration in support of motion to compel	0.4	\$550.00	\$220.00
03/31/23	SL	Drafting Reply on MTC to CDR	1.3	\$495.00	\$643.50
04/03/23	BHC	Exchanged emails with co-counsel regarding late filed reply and stipulation [.2].	0.2	\$495.00	\$99.00
04/04/23	PA	Review Sam Leonard's email re: interpretation of CDR spreadsheet, review spreadsheet and respond.	0.3	\$550.00	\$165.00
04/04/23	SL	Reviewing CDR production RE class data	0.5	\$495.00	\$247.50
04/04/23	SL	Drafting correspondence to opposing counsel regarding cross motions for cert on CDR and sched	0.5	\$495.00	\$247.50
04/05/23	BHC	Read and analyzed CDR's motion to deny class certification [1].	1.0	\$495.00	\$495.00

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/05/23	BHC	Video conference with co-counsel regarding case management [.6].	0.2	\$495.00	\$99.00
04/05/23	PA	Review and respond to email from Jodi Nuss (TMLG), re Thrive and CDR spreadsheet data analysis.	0.1	\$550.00	\$55.00
04/05/23	PA	Phone call with Blythe Chandler and Sam Leonard re: discovery strategy and opposition to motion to deny class certification	0.5	\$550.00	\$275.00
04/05/23	SL	Call with co-counsel RE Cert and CDR Records	0.4	\$495.00	\$198.00
04/06/23	PA	Review and analyze data and draft email with summary for Blythe Chandler	0.5	\$550.00	\$275.00
04/10/23	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
04/10/23	PA	Draft email to CDR counsel re: discussion of discovery order compliance, confirming agreement and identifying issues.	0.6	\$550.00	\$330.00
04/10/23	PA	Review and respond to email from Blythe Chandler : key word search terms.	0.1	\$550.00	\$55.00
04/10/23	PA	Draft confirming email re: Zoom conference with CDR counsel and forward to Blythe Chandler for review	0.3	\$550.00	\$165.00
04/10/23	PA	Phone call with Mark Case (CDR), Jeff Hasson and Blythe Chandler re: CDR discovery order	0.5	\$550.00	\$275.00
04/11/23	BHC	Research related to response to CDR's motion to deny class certification [1.5].	1.5	\$495.00	\$742.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/11/23	BHC	Exchanged emails with defense counsel regarding briefing schedules [.2].	0.1	\$495.00	\$49.50
04/11/23	PA	Phone call /w Sam Leonard re: CDR discovery issues.	0.2	\$550.00	\$110.00
04/11/23	SL	Call with co-counsel RE CDR Discovery call	0.3	\$495.00	\$148.50
04/13/23	PA	Review and respond to email from potential plaintiff v. CDR	0.2	\$550.00	\$110.00
04/13/23	PA	Review, research and respond to email from Brad Fisher re: word limits and filing deadlines for CDR's motion.	0.2	\$550.00	\$110.00
04/13/23	PA	Research substituting class plaintiff and send email to co-counsel.	1.2	\$550.00	\$660.00
04/13/23	PA	Review and respond to email from Blythe Chandler re: CDR request for extension.	0.1	\$550.00	\$55.00
04/13/23	SL	Emailing with co-counsel regarding briefing and discovery	0.3	\$495.00	\$148.50
04/14/23	PA	Review and respond to emails from potential plaintiff	0.2	\$550.00	\$110.00
04/14/23	PA	Draft email confirming substance of meet and confer phone call with CDR	0.4	\$550.00	\$220.00
04/14/23	PA	Phone call with potential plaintiff	0.3	\$550.00	\$165.00
04/14/23	PA	Phone call with Jeff Hasson, Mark Case and Sam Leonard re: discovery issues	1.1	\$550.00	\$605.00
04/14/23	PA	Phone call with Sam Leonard re: CDR discovery issues	0.5	\$550.00	\$275.00
04/14/23	SL	Call with co-counsel RE CDR Discovery Responses	0.5	\$495.00	\$247.50
04/14/23	SL	Call with opposing counsel RE Spoliation - CDR Putative class member account records	0.6	\$495.00	\$297.00
04/14/23	SL	Drafting confirming letter to CDR	1.0	\$495.00	\$495.00
04/15/23	PA	Continued drafting of motion to amend, including analysis of Gustov Cortez facts.	2.0	\$550.00	\$1,100.00
04/15/23	PA	Begin drafting motion for leave to amend.	0.5	\$550.00	\$275.00

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/16/23	PA	Complete drafting of 5th Amended Counterclaim	1.2	\$550.00	\$660.00
04/17/23	BHC	Worked on motion for leave to amend [1.9]; sent same to co-counsel [1.1].	2.0	\$495.00	\$990.00
04/17/23	PA	Review for new class plaintiffs	0.6	\$550.00	\$330.00
04/17/23	PA	Review edits to motion for leave to amend made by Blythe Chandler and Sharon Grace and begin revising the motion.	1.8	\$550.00	\$990.00
04/18/23	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
04/18/23	PA	Revise motion for leave to file amended complaint	1.7	\$550.00	\$935.00
04/18/23	PA	Review various emails regarding scheduling of motions to deny class certification and have conference call with co-counsel re: how to respond.	0.6	\$550.00	\$347.00
04/18/23	PA	Further revisions to motion for leave to amend	0.4	\$550.00	\$220.00
04/18/23	PA	Email to co-counsel re: motion for leave to amend	0.1	\$550.00	\$55.00
04/18/23	PA	Revise complaint to make it consistent with motion for leave to amend	0.4	\$550.00	\$220.00
04/18/23	PA	Email to CDR counsel re: production of data compilation.	0.1	\$550.00	\$55.00
04/18/23	SL	Call with co-counsel RE Responding to Motions to Deny Cert	0.3	\$495.00	\$148.50
04/19/23	BHC	Emails and telephone calls with co-counsel regarding 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
04/19/23	SL	Editing Motion to Amend	2.9	\$495.00	\$1,435.50
04/20/23	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

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/20/23	PA	Phone call with Sam Leonard to discuss CDR discovery issues and motion to deny class cert.	0.3	\$550.00	\$165.00
04/20/23	PA	Review and revise motion for leave to file motion for leave to file amended complaint and supporting declaration.	1.6	\$550.00	\$880.00
04/20/23	PA	Draft email to Jeff Hasson re: compliance with discovery order	0.5	\$550.00	\$275.00
04/20/23	SL	Reviewing spreadsheet from CDR	0.2	\$495.00	\$99.00
04/20/23	SL	Call with co-counsel RE CDR discovery	0.4	\$495.00	\$198.00
04/20/23	SL	Drafting Motion to Amend	1.0	\$495.00	\$495.00
04/21/23	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].	3.0	\$495.00	\$1,485.00
04/21/23	PA	Phone call with Jeff Hasson re: CDR compliance with discovery order.	0.3	\$550.00	\$165.00
04/21/23	PA	Phone call with Sam Leonard re: CDR compliance with discovery order.	0.3	\$550.00	\$165.00
04/21/23	PA	Review discovery and email Sam Leonard re: interest charges	0.2	\$550.00	\$110.00
04/21/23	SL	Drafting Response to CDR Motion to Deny Cert	6.1	\$495.00	\$3,019.50
04/24/23	PA	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	0.5	\$550.00	\$275.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/24/23	PA	Review and respond to email from Jeff Hasson arguing about language in the Stipulation Extending Time for CDR to Comply with Discovery Order	0.2	\$550.00	\$110.00
04/24/23	PA	Email co-counsel about potential call rep who is paid in full	0.1	\$550.00	\$55.00
04/24/23	PA	Phone call with Sam Leonard re: CDR data and responding to motion to deny class certification	0.2	\$550.00	\$110.00
04/25/23	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
04/25/23	PA	Review and respond to Brad Fisher proposal for concession in response to our request for a continuance.	0.6	\$550.00	\$330.00
04/25/23	PA	Review Blythe Chandler email call here re: Brad Fisher proposal for concessions in response to our request for a continuance.	0.2	\$550.00	\$110.00
04/25/23	PA	Zoom meeting with Blythe Chandler, Amanda Steiner and Sam Leonard to discuss motions to deny class certification	0.3	\$550.00	\$165.00
04/26/23	HB	Prepared a re-notice of hearing for motion for leave to amend [.4].	0.4	\$150.00	\$60.00
04/26/23	PA	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.	0.2	\$550.00	\$110.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
04/26/23	PA	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.	0.1	\$550.00	\$55.00
04/26/23	PA	Email to CDR counsel and counsel for all parties re: continuance	0.1	\$550.00	\$55.00
04/27/23	BHC	Email to all counsel regarding renoting motions [1.2]; reviewed and approved renote for filing [1.1].	0.1	\$495.00	\$49.50
05/04/23	SL	Legal Research on Response to CDR Motion to Deny Cert	0.8	\$495.00	\$396.00
05/05/23	SL	Draft reply on MTA	1.7	\$495.00	\$841.50
05/05/23	SL	Draft response MTDC	1.5	\$495.00	\$742.50
05/08/23	SL	Drafting Reply on MTA	6.8	\$495.00	\$3,366.00
05/09/23	BHC	Worked on reply in support of motion for leave to amend [2.9].	2.9	\$495.00	\$1,435.50
05/09/23	SL	Drafting Reply on MTA and Declaration	7.1	\$495.00	\$3,514.50
05/11/23	SL	Drafting Response to MTDC	4.1	\$495.00	\$2,029.50
05/12/23	BHC	Worked on response to motion to deny class certification [1.5]; discussed same with Mr. Leonard [1.2]; email to Mr. Leonard regarding same [1.1].	1.8	\$495.00	\$891.00
05/12/23	SL	Drafting Response to MTDC	2.6	\$495.00	\$1,287.00
05/14/23	SL	Drafting Response to MTDC	3.8	\$495.00	\$1,881.00
05/15/23	PA	Review supplemental CDR court-ordered discovery responses, compare with existing data and forward comments to co-counsel	0.4	\$550.00	\$220.00
05/15/23	SL	Drafting Response to MTDC	1.2	\$495.00	\$594.00
05/16/23	SL	Drafting Response to MTDC	6.2	\$495.00	\$3,069.00
05/20/23	SL	Drafting Response to MTDC	3.8	\$495.00	\$1,881.00

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/22/23	BHC	Worked with staff to finalize and file Amended Answer and Fifth Amended Counterclaims [.3].	0.3	\$495.00	\$148.50
05/22/23	SL	Drafting Response to Motion to Deny Cert	7.8	\$495.00	\$3,861.00
05/23/23	SL	Response to MTDC	4.7	\$495.00	\$2,326.50
05/24/23	BHC	Worked on response to CDR's motion to deny certification.	2.2	\$495.00	\$1,089.00
05/24/23	PA	Review and edit opposition to CDR Motion to Deny Class Certification.	0.6	\$550.00	\$330.00
05/24/23	PA	Phone call with Sam Leonard re: opposition to CDR Motion to Deny Class Certification.	0.3	\$550.00	\$165.00
05/24/23	SL	Call with Paul RE CDR brief and Thrive discovery responses related to CDR brief.	0.2	\$495.00	\$74.25
05/25/23	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
05/25/23	HB	Worked on exhibits in support of responses to motion to decertify and motion to strike [1.0].	1.0	\$150.00	\$150.00
05/25/23	PA	Review and edit revised opposition to CDR Motion to Deny Class Certification.	0.4	\$550.00	\$220.00
05/25/23	SL	SL Declaration ISO Response to CDR MTDC	2.3	\$495.00	\$1,138.50
05/26/23	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

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
05/26/23	HB	Worked on Declaration and exhibits in support of response to motions to decertify and strike [4.6].	1.5	\$150.00	\$225.00
05/30/23	BHC	Worked on response to CDR motion to deny certification; reviewed and approved same for filing [1.8].	1.8	\$495.00	\$891.00
05/30/23	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
05/30/23	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
05/30/23	SL	Call with co-counsel regarding Response to motion to deny cert exhibits	0.2	\$495.00	\$74.25
05/30/23	SL	Drafting disclosure of witnesses	0.9	\$495.00	\$420.75
06/02/23	BHC	Exchanged emails with co-counsel regarding case management and argument prep [2].	0.1	\$495.00	\$49.50
06/05/23	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
06/05/23	SL	Reviewing CDR's Reply and Supporting Declaration and emailing with co-counsel regarding strate	1.3	\$495.00	\$643.50
06/08/23	AMS	Prepared for and participated in moot for hearing on motion to deny class certification [1.5].	0.7	\$550.00	\$385.00
06/08/23	SL	Hearing prep CDR MTN to Deny Cert	4.6	\$495.00	\$2,277.00

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
06/09/23	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
06/09/23	SL	Hearing prep CDR Motion to Deny Cert	2.1	\$495.00	\$1,039.50
06/09/23	SL	Hearing CDR Motion to Deny Cert 1.0 Thrive hearing motion to Deny Cert .7	1.0	\$495.00	\$504.90
06/12/23	BHC	Drafted proposed order denying CDR motion to dismiss [2.5].	2.5	\$495.00	\$1,237.50
06/12/23	PA	Review and edit revisions to proposed findings of fact and conclusions of law for Thrive/Belcorp/CDR Motions to Deny Class Certification	0.3	\$550.00	\$184.00
06/13/23	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
06/23/23	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
06/23/23	PA	Zoom meeting with co-counsel re: strategy with CDR and Thrive orders	0.5	\$550.00	\$275.00
06/23/23	PA	Draft short memo for Zoom meeting with co-counsel re: strategy with CDR and Thrive orders	0.1	\$550.00	\$55.00
06/23/23	SL	Call with co-counsel RE Hearing	1.0	\$495.00	\$495.00
06/27/23	BHC	Email to Mr. Hasson regarding discovery requests to named plaintiffs [1].	0.1	\$495.00	\$49.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
06/27/23	BHC	Worked with Ms. Nuss on data analysis issues [.3]; email to co-counsel proposing settlement demand [.2].	0.5	\$495.00	\$247.50
06/27/23	JN	Worked on data analysis.[.5]	0.5	\$195.00	\$97.50
06/28/23	PA	Review email from Blythe Chandler re CDR class motion and settlement, reveiw data files and respond.	0.3	\$550.00	\$165.00
06/28/23	PA	Zoom call with Blythe Chandler and Sam Leonard re: CDR settlement and class certification	0.5	\$550.00	\$275.00
06/28/23	SL	Call with co-counsel regarding settlement strategy	0.5	\$495.00	\$247.50
06/28/23	SL	Editing demand	0.2	\$495.00	\$99.00
06/28/23	SL	Call with DG and JP regarding settlement.	0.2	\$495.00	\$99.00
06/29/23	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
06/29/23	PA	Emails with co-counsel re: settlement offer letter and phone calls to plaintiffs	0.2	\$550.00	\$110.00
06/29/23	SL	Editing settlement offer.	0.2	\$495.00	\$99.00
06/29/23	SL	Drafting proposed response to CDR	0.2	\$495.00	\$99.00
06/30/23	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
06/30/23	PA	Review email from Jeff Hasson and email co-counsel re: response	0.3	\$550.00	\$165.00
07/10/23	BHC	Drafted stipulation regarding stay pending settlement negotiations.	0.7	\$495.00	\$346.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
07/10/23	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
07/10/23	PA	Revise stipulation to stay proceedings and sent to CDR counsel for review	0.1	\$550.00	\$55.00
07/10/23	PA	Review and respond to Jeff Hasson email re: stipulation	0.2	\$550.00	\$110.00
07/10/23	PA	Zoom call with Blythe Chandler and Sam Leonard re: settlement proposal	0.6	\$550.00	\$330.00
07/10/23	PA	Zoom call re: settlement with Jeff Hasson, Mark Case, Blythe Chandler, Sam Leonard	0.7	\$550.00	\$385.00
07/10/23	SL	Call regarding Proposed settlement	0.3	\$495.00	\$148.50
07/10/23	SL	Reviewing CDR class data	0.6	\$495.00	\$297.00
07/10/23	SL	Call with opposing counsel	0.5	\$495.00	\$247.50
07/10/23	SL	Call with co-counsel regarding settlement strategy	0.5	\$495.00	\$247.50
07/11/23	PA	Review and respond to email from Blythe Chandler re: response to Jeff Hasson in connection with CDR settlement	0.1	\$550.00	\$55.00
07/12/23	PA	Phone call with Sam Leonard to analyze CDR Interest data	0.3	\$550.00	\$165.00
07/12/23	PA	Review and respond to email from Sam Leonard re: CDR revised damage calculations	0.2	\$550.00	\$110.00
07/12/23	PA	Review email from Jeff Hasson re: RCW 19.16.450 and Fireside, review case and email co-counsel re: settlement discussions	0.3	\$550.00	\$165.00
07/12/23	SL	Review CDR settlement spreadsheet and previous spreadsheets	2.1	\$495.00	\$1,039.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
07/12/23	SL	CDR data review	0.8	\$495.00	\$396.00
07/13/23	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
07/13/23	PA	Recompile CDR damages list from CDR1789 and send to Blythe to use in settlement communication with CDR.	0.4	\$550.00	\$220.00
07/13/23	PA	Zoom call with Sam Leonard and Blythe Chandler re CDR damage calculations	1.1	\$550.00	\$605.00
07/13/23	SL	Call RE CDR Settlement Class Definition	0.5	\$495.00	\$247.50
07/18/23	PA	Review email from Jeff Hasson re: CDR settlement and send comments to co-counsel	0.3	\$550.00	\$165.00
07/18/23	PA	Zoom meeting with Jeff Hasson, Mark Case and Blythe Chandler to discuss CDR settlement	0.4	\$550.00	\$220.00
07/18/23	SL	CDR - Reviewing email from JH with counter offer and emailing with PA and BC regarding next st	0.3	\$495.00	\$148.50
07/19/23	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
07/19/23	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
07/19/23	PA	Review settlement agreement drafted by Blythe Chandler and email comments	1.0	\$550.00	\$550.00
07/19/23	SL	Call with Co-counsel RE Strategy on CDR and Status of Settlement Talks	0.3	\$495.00	\$148.50

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
07/20/23	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
07/20/23	SL	Editing settlement and emailing with co-counsel of settlement strategy	0.8	\$495.00	\$396.00
07/28/23	PA	Discuss CDR settlement offer Mosley, Peltier and Cortez.	0.4	\$550.00	\$220.00
07/31/23	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
08/01/23	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
08/01/23	PA	Review renewed settlement email from Jeff Hasson and forward to co-counsel with comments	0.1	\$550.00	\$55.00
08/01/23	PA	Review Blythe Chandler's proposed response to Jeff Hasson settlement email, review RCW 19.16.450 cases, and respond to Blythe's email	0.3	\$550.00	\$165.00
08/02/23	PA	Review email from Jeff Hasson re: proposal to excluded BK accounts and forward comments to co-counsel	0.1	\$550.00	\$55.00
08/03/23	BHC	Email to Mr. Hasson regarding proposed settlement class definition [4].	0.4	\$495.00	\$198.00
08/09/23	PA	Phone call with Sam Leonard re: CDR settlement offer	0.2	\$550.00	\$110.00
08/09/23	SL	Reviewing CDR offer and Class Data	0.5	\$495.00	\$247.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
08/10/23	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
		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
08/11/23	PA	Emails to plaintiffs re: CDR settlement offer	0.2	\$550.00	\$110.00
08/16/23	PA	Review and edit CDR settlement agreement	0.4	\$550.00	\$220.00
08/16/23	SL	Reviewing and editing settlement agreement with CDR	2.1	\$495.00	\$1,039.50
		Worked on redlined settlement agreement [.6]; wrote settlement offer			
08/17/23	BHC	response to Mr. Hasson [.4].	1.0	\$495.00	\$495.00
		Analyzed settlement communication from CDR regarding scope of release;			
08/18/23	BHC	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
08/18/23	PA	Phone call with Blythe Chandler re: negotiating settlement agreement with CDR	0.2	\$550.00	\$110.00
		Worked on CDR settlement agreement; sent same to co-counsel for review			
08/21/23	BHC	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
08/22/23	BHC	Email to notice provider requesting bid [.7].	0.7	\$495.00	\$346.50
08/24/23	BHC	Worked on CDR settlement notices [2.1]. Exchanged emails with administrator regarding bid request [.2].	2.3	\$495.00	\$1,138.50
		Reviewed final version of settlement agreement from counsel for CDR;			
08/25/23	BHC	sent same to filing [.3].	0.3	\$495.00	\$148.50

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
09/05/23	BHC	Email to co-counsel regarding drafting preliminary and final approval orders and motion [.2].	0.2	\$495.00	\$99.00
09/08/23	SL	Drafting Preliminary and Final Approval Orders	1.6	\$495.00	\$792.00
09/11/23	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].	1.6	\$495.00	\$792.00
09/12/23	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].	1.0	\$495.00	\$495.00
09/13/23	PA	Review Jeff Hasson notes on settlement docs and forward comments to co-counsel	0.2	\$550.00	\$110.00
09/15/23	BHC	Revised CDR settlement agreement to reflect administrator and revised notices; sent same to all counsel [.6].	0.6	\$495.00	\$297.00
09/25/23	BHC	Worked on settlement agreement and exhibits; sent same to staff to finalize [.9].	0.9	\$495.00	\$445.50
09/26/23	BHC	Revised settlement agreement section cross references [.3].	0.3	\$495.00	\$148.50
09/29/23	BHC	Exchanged emails with Mr. Hasson regarding CDR settlement [.1].	0.1	\$495.00	\$49.50
10/05/23	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

Exhibit "A"

EXHIBIT "A"

Date	Initials	Narrative	Units	Rate	Value
10/06/23	BHC	Worked on motion for preliminary approval and declaration supporting same.	2.0	\$495.00	\$990.00
10/09/23	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
10/25/23	BHC	Reviewed order granting preliminary approval [2].	0.2	\$495.00	\$99.00
10/26/23	JN	Worked on plans for preparation of data for settlement administrator [2]	0.2	\$195.00	\$39.00
10/30/23	JN	Worked on data analysis and output [8].	0.8	\$195.00	\$156.00
10/31/23	JN	Worked on revisions to/upload of notices, data, and settlement agreement [3].	0.3	\$195.00	\$58.50
		Totals	667.6		\$313,860.65

EXHIBIT

B

EXHIBIT "B"

Date	Initials	Narrative	Units	Rate	Value
03/22/21	SL	Review Thrive Discovery Responses	1.1	\$495.00	\$519.75
03/22/21	SL	Review Thrive Discovery Responses	1.1	\$495.00	\$519.75
04/27/21	SL	Discovery call with Thrive	0.5	\$495.00	\$247.50
04/27/21	SL	Discovery call with Thrive	0.5	\$495.00	\$247.50
08/05/21	SL	Reviewing Thrive discovery responses and emailing with PA	0.1	\$495.00	\$49.50
08/05/21	SL	Emailing with Co-counsel RE: [External] Pierce v. Thrive Communities Moveout Statement Revi	0.2	\$495.00	\$99.00
09/29/21	SL	Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	1.2	\$495.00	\$594.00
09/30/21	SL	Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	1.2	\$495.00	\$594.00
11/22/22	SL	Drafting letter to HM regarding outstanding Thrive records related to CDR's claim against clients	0.6	\$495.00	\$297.00
02/16/23	SL	Editing 4th RFPs to Thrive	0.1	\$495.00	\$49.50
02/16/23	SL	Editing Motion to Compel and Discovery to Thrive	1.4	\$495.00	\$693.00
		Totals	7.9		\$3,910.50

EXHIBIT

C

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/11/20	PA	Draft case memo for co-counsel	0.5	\$550.00	\$275.00
05/18/20	SL	File Information	0.2	\$495.00	\$99.00
05/21/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00
05/27/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00
05/27/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00
06/18/20	PA	Phone call with Sam Leonard to discuss filing strategy	0.2	\$550.00	\$110.00
07/13/20	SL	Facts - Motion to Vacate	0.2	\$495.00	\$99.00
07/14/20	PA	Being drafting complaint	0.7	\$550.00	\$385.00
07/17/20	SL	Motion to Vacate	2.6	\$495.00	\$1,287.00
07/17/20	SL	Documents regarding failure to serve and facts	0.2	\$495.00	\$99.00
07/20/20	SL	Researching Hurricane and Service Issues	0.3	\$495.00	\$148.50
07/20/20	SL	Facts and Documents MTV	0.4	\$495.00	\$198.00
07/20/20	SL	Facts and Documents MTV	0.2	\$495.00	\$99.00
07/21/20	SL	Motion to Vacate	0.3	\$495.00	\$148.50
07/27/20	PA	Complete initial draft of complaint.	1.2	\$550.00	\$660.00
07/27/20	PA	Drafting counterclaim continued. Complete fact section and class definition	1.8	\$550.00	\$990.00
07/27/20	SL	MTV and research	2.2	\$495.00	\$1,089.00
07/27/20	SL	Call with PA regarding Motion to Vacate and CAA violatio	0.2	\$495.00	\$99.00
07/27/20	SL	Facts and Documents MTV	0.4	\$495.00	\$198.00
07/27/20	SL	Gardiner Motion to Vacate Documents and questions	0.2	\$495.00	\$99.00
07/27/20	SL	CAA and CPA claims against CDR and claims against Thriv	0.2	\$495.00	\$99.00
07/28/20	SL	Drafting MTV and emailing with clients regarding facts	1.6	\$495.00	\$792.00
07/28/20	SL	Facts and Documents MTV	0.5	\$495.00	\$247.50
07/29/20	SL	Researching Hurricane - MTV	0.4	\$495.00	\$198.00
07/29/20	SL	MTV	1.2	\$495.00	\$594.00
07/29/20	SL	Facts and Documents MTV	0.5	\$495.00	\$247.50
07/30/20	SL	Call regarding researching whereabouts on the day of ser	1.0	\$495.00	\$495.00
07/31/20	SL	Forwarding Address	0.2	\$495.00	\$99.00
07/31/20	SL	Emails from The Eden	0.2	\$495.00	\$99.00
08/04/20	SL	Motion to Vacate	3.2	\$495.00	\$1,584.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
08/04/20	SL	Bank and Phone Records	0.2	\$495.00	\$99.00
08/04/20	SL	Legality of interest and Early Move out Penalty	0.2	\$495.00	\$99.00
08/11/20	PA	Phone call with Blythe Chandler and Sam Leonard re: filing strategy and motion to set aside default	0.3	\$550.00	\$165.00
08/11/20	SL	MTV	1.1	\$495.00	\$544.50
08/13/20	SL	RE: Phone Bill & Bank statement	0.2	\$495.00	\$99.00
08/13/20	SL	Facts and Documents MTV	0.2	\$495.00	\$99.00
08/19/20	SL	MTV	0.4	\$495.00	\$198.00
08/19/20	SL	MTV	1.2	\$495.00	\$594.00
08/19/20	SL	Facts and Documents - RE: Flight Back	0.2	\$495.00	\$99.00
08/19/20	SL	RE: Questions to help with your case	0.2	\$495.00	\$99.00
08/19/20	SL	Emails with Thrive - Moveout Charges	0.2	\$495.00	\$99.00
08/21/20	SL	MTV	0.8	\$495.00	\$396.00
08/22/20	SL	MTV	1.4	\$495.00	\$693.00
08/26/20	SL	MTV & Gardiner Declaration	8.2	\$495.00	\$4,059.00
08/26/20	SL	Status	0.2	\$495.00	\$99.00
08/26/20	SL	Facts and Documents - One other question.	0.2	\$495.00	\$99.00
08/26/20	SL	RE: One other question.	0.2	\$495.00	\$99.00
08/26/20	SL	Draft CDR v. Gardiner - Motion to Vacate	0.2	\$495.00	\$99.00
08/26/20	SL	Declarations	0.2	\$495.00	\$99.00
08/27/20	PA	Review and revise Motion to Set Aside Default	2.3	\$550.00	\$1,265.00
08/27/20	SL	MTV & Gardiner and Pierce Declarations	2.3	\$495.00	\$1,138.50
08/27/20	SL	RE: CDR v. Gardiner - Motion to Vacate	0.2	\$495.00	\$99.00
08/27/20	SL	MTV Editing	0.2	\$495.00	\$99.00
08/27/20	SL	Gardiner Declaration	0.2	\$495.00	\$99.00
08/27/20	SL	More Questions	0.2	\$495.00	\$99.00
08/28/20	SL	Call with Jordan regarding declaration	0.6	\$495.00	\$297.00
08/28/20	SL	Draft Facts	0.2	\$495.00	\$99.00
08/30/20	PA	Extensive revisions to Motion to Set Aside Default, including research and document review.	6.2	\$550.00	\$3,410.00

Date	Initials	Narrative	Units	Rate	Value
08/31/20	SL	Declaration of Leonard, Proposed Order, Motion for Ord	1.3	\$495.00	\$643.50
08/31/20	SL	MTV and CAA violations	0.2	\$495.00	\$99.00
08/31/20	SL	MTV and CAA violations	0.2	\$495.00	\$99.00
08/31/20	SL	CDR v. Jordan Pierce and Donte Gardiner - Notice of App	0.2	\$495.00	\$99.00
08/31/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
08/31/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
08/31/20	SL	CDR v. Pierce and Gardiner - Motion to Vacate	0.2	\$495.00	\$99.00
09/09/20	SL	Status Update	0.2	\$495.00	\$99.00
09/10/20	PA	Research collateral estoppel and res judicata re: default judgments and send brief memo to Sam Leonard and Blythe Chandler re: plan of action	1.0	\$550.00	\$550.00
09/10/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
09/14/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00	\$99.00
09/14/20	SL	Request for Hearing - Columbia Debt Recovery v. Pierce e	0.2	\$495.00	\$99.00
09/18/20	SL	Hearing on MTV Status	0.1	\$495.00	\$49.50
09/21/20	SL	MTV Hearing	0.1	\$495.00	\$49.50
09/22/20	BHC	New matter and conflict check; drafted representation agreement [4].	0.2	\$495.00	\$99.00
09/22/20	SL	Drafting/Reviewing CorrespondenReviewing order regarding ex-parte filing from the court	0.2	\$495.00	\$99.00
09/22/20	SL	Emailing with Co-Counsel RE: order regarding ex-parte filing	0.2	\$495.00	\$99.00
09/22/20	SL	Email with Court Hearing schedule - Ex parte Order	0.2	\$495.00	\$99.00
09/22/20	SL	Emailing with Co-Counsel RE: Gardiner v. CDR/Thrive	0.2	\$495.00	\$99.00
09/26/20	PA	Review, revise and complete first draft of counter claim	0.6	\$550.00	\$303.00
09/26/20	PA	Email Sam Leonard and Blythe Chandler first draft of counter claim with comments	0.1	\$550.00	\$28.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
09/28/20	SL	Reviewing Opposing Party PleadinResponse to Motion to Vacate	0.5	\$495.00	\$247.50
09/28/20	SL	Reply to Response to Motion to Vacate	1.2	\$495.00	\$594.00
09/28/20	SL	MTV - Moveout emails with Thrive	0.2	\$495.00	\$99.00
09/28/20	SL	CDR's Response to MTV	0.2	\$495.00	\$99.00
09/28/20	SL	CDR's Response to MTV	0.2	\$495.00	\$99.00
09/29/20	SL	Reply	6.8	\$495.00	\$3,366.00
09/30/20	PA	Review and make further revisions to reply memo in support of motion to vacate judgment	0.1	\$550.00	\$55.00
09/30/20	PA	Phone call with Sam Leonard re: further revisions to reply memo in support of motion to vacate judgment	0.1	\$550.00	\$55.00
09/30/20	PA	Review and revise Sam Leonard draft of reply memorandum.	2.0	\$550.00	\$1,100.00
09/30/20	SL	Editing Reply	1.0	\$495.00	\$495.00
09/30/20	SL	Supp. Decl. of Gardiner and Pierce	1.0	\$495.00	\$495.00
09/30/20	SL	Reply edits	0.2	\$495.00	\$99.00
09/30/20	SL	Reply	0.1	\$495.00	\$49.50
10/01/20	PA	Email to Sam Leonard and Blythe Chandler re: following up on motion to vacate	0.1	\$550.00	\$55.00
10/01/20	SL	MTV Hearing	2.1	\$495.00	\$1,039.50
10/01/20	SL	Motion to Set Aside Default	0.7	\$495.00	\$346.50
10/01/20	SL	Reply does not appear in the docket	0.2	\$495.00	\$99.00
10/01/20	SL	Hearing Over No Decision Yet	0.1	\$495.00	\$49.50
10/01/20	SL	Hearing	0.2	\$495.00	\$99.00
10/01/20	SL	Hearing	0.2	\$495.00	\$99.00
10/07/20	SL	Settlement Offer	0.2	\$495.00	\$99.00
10/07/20	SL	Settlement Offer	0.2	\$495.00	\$99.00
10/09/20	SL	Settlement Offer	0.3	\$495.00	\$148.50
10/09/20	SL	Settlement Offer	0.2	\$495.00	\$99.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
10/09/20	SL	Settlement Offer and Case Strength	0.2	\$495.00	\$99.00
10/13/20	SL	RE: Settlement Offer	0.1	\$495.00	\$49.50
10/13/20	SL	Settlement and Order Status	0.2	\$495.00	\$99.00
10/16/20	SL	Settlement Offer and Case Strength	0.2	\$495.00	\$99.00
		Prepared draft and finalized Defendant's answer and counterclaims [1.1];			
11/02/20	BKK	prepared draft of petition to remove to superior court [.5].	0.8	\$125.00	\$100.00
11/02/20	PA	Phone call with Sam Leonard re: adding FDCPA claim	0.1	\$550.00	\$55.00
11/02/20	PA	Email to Blythe Chandler re: adding FDCPA claim	0.1	\$550.00	\$55.00
11/02/20	SL	Editing Counterclaims	1.0	\$495.00	\$495.00
11/02/20	SL	MTV - Order Granting	0.3	\$495.00	\$148.50
11/02/20	SL	MTV Granted	0.2	\$495.00	\$99.00
11/02/20	SL	MTV Granted	0.2	\$495.00	\$99.00
11/03/20	BHC	Reviewed final filed complaint [.3].	0.1	\$495.00	\$49.50
11/03/20	BKK	Reviewed, revised and finalized petition to remove to superior court [.2].	0.1	\$125.00	\$12.50
11/06/20	EBN	Worked on petition for removal and exhibits to same.	1.0	\$200.00	\$200.00
11/11/20	PA	Draft written discovery to serve on Columbia Debt Recovery	1.8	\$550.00	\$990.00
11/19/20	BG	Revised discovery requests to CDR [1.6]	1.6	\$325.00	\$520.00
		Reviewed affidavit and notice of appearance [0.2]; reviewed rules related			
11/19/20	BG	to affidavit of prejudice [0.3].	0.2	\$325.00	\$65.00
11/19/20	BHC	Reviewed notices of appearance and request for change of judge [2].	0.1	\$495.00	\$49.50
11/20/20	BHC	Worked on motion to disqualify judge; research regarding same [3].	0.1	\$495.00	\$49.50
		Worked on and finalized notice of appearance, declaration of service, note			
11/20/20	HMR	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

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
11/23/20	BG	Worked on discovery requests [1.5].	0.7	\$325.00	\$227.50
11/23/20	PA	Review and edit written discovery to CDR. Exchange emails with co counsel re: final changes to written discovery to Thrive and CDR	0.2	\$550.00	\$111.00
11/24/20	BG	Revised discovery requests to Thrive and CDR [0.9].	0.4	\$325.00	\$130.00
12/01/20	BG	Case management [0.1]; reviewed and responded to email from co-counsel [0.1].	0.1	\$325.00	\$32.50
12/08/20	BHC	Telephone conference with Mr. Fisher regarding case schedule [.2]; exchanged emails with co-counsel regarding same [.2].	0.4	\$495.00	\$198.00
12/08/20	PA	Review and respond to email re: dismissal of Jose Salas (deceased)	0.1	\$550.00	\$55.00
12/18/20	BHC	Email to Mr. Fisher regarding case management matters [.1].	0.1	\$495.00	\$49.50
01/19/21	BHC	Email to opposing counsel regarding requested extension and case management [.2].	0.1	\$495.00	\$49.50
01/22/21	BHC	Approved discovery requests for service; exchanged emails with staff regarding same [.3].	0.1	\$495.00	\$49.50
01/29/21	BHC	Telephone conference with all counsel regarding case management and class certification schedule [.5]; prepared for same [.3].	0.4	\$495.00	\$198.00
01/29/21	SL	Meeting with opposing counsel RE discovery	0.4	\$495.00	\$198.00
02/23/21	BG	Case management [0.2].	0.1	\$325.00	\$32.50
03/02/21	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
03/03/21	BG	Worked on meet and confer letter for CDR [4.0].	4.0	\$325.00	\$1,300.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
03/03/21	BG	Coordinated drafting of protective order [0.2].	0.1	\$325.00	\$32.50
03/04/21	BG	Worked on meet and confer letter for CDR [0.5].	0.5	\$325.00	\$162.50
03/04/21	PA	Review and revise meet and confer letter to Columbia Debt Recovery	0.4	\$550.00	\$220.00
03/05/21	BHC	Worked on discovery letters to Thrive and CDR [1.1]; worked on document review [.5].	0.8	\$495.00	\$396.00
03/10/21	BHC	Read decisions granting summary judgment against Columbia Debt Recovery [.4].	0.4	\$495.00	\$198.00
03/10/21	BHC	Exchanged emails with co-counsel and all counsel regarding case management and discovery conference [.4].	0.2	\$495.00	\$99.00
03/16/21	PA	Meet and confer phone call with co-counsel and counsel for Columbia Debt Recovery and Thrive Communities	0.7	\$550.00	\$385.00
03/16/21	PA	Phone call with Blythe Chandler and Sam Leonard to discuss discovery	0.2	\$550.00	\$83.00
03/16/21	SL	Discovery conference with Thrive and CDR	1.6	\$495.00	\$792.00
03/16/21	SL	Call with Co-counsel RE Next steps	0.2	\$495.00	\$99.00
03/16/21	SL	Reviewing CDR Discovery Requests and Response Prep	1.0	\$495.00	\$495.00
03/17/21	PA	Further research and drafting of responses to CDR interrogatories to Gardiner	0.5	\$550.00	\$275.00
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.8	\$550.00	\$440.00
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.3	\$550.00	\$165.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
03/18/21	PA	Complete researching and drafting responses to CDR document requests to Donte Gardiner/forward to Sam Leonard for initial factual review and investigation	0.8	\$550.00	\$440.00
03/18/21	PA	Begin researching and drafting responses to CDR document requests to Donte Gardiner	0.8	\$550.00	\$440.00
03/22/21	SL	Review Thrive Discovery Responses	1.1	\$495.00	\$519.75
03/23/21	BHC	Finalized stipulated protective agreement and sent to staff for submission to court [.2].	0.1	\$495.00	\$49.50
03/24/21	BHC	Discussed case management with co-counsel [.3]; email to co-counsel regarding same [.1].	0.2	\$495.00	\$99.00
03/24/21	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
03/24/21	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].	1.0	\$125.00	\$125.00
03/25/21	BHC	Worked with staff on discovery requests to Wojdak; emails to co-counsel regarding same [.1].	0.1	\$495.00	\$49.50
03/29/21	PA	Review Brad Fisher letter re: CDR discovery positions and email comments and strategy to co-counsel	0.4	\$550.00	\$220.00
03/29/21	SL	Reviewing CDR responses	1.0	\$495.00	\$495.00
03/29/21	SL	Drafting Correspondence to Co Counsel RE CDR Discovery	0.3	\$495.00	\$148.50
03/29/21	TS	Worked on notice of Rule 30(b)(6) deposition to Columbia Debt Recovery.	0.5	\$125.00	\$62.50

Date	Initials	Narrative	Units	Rate	Value
03/30/21	PA	Email to co-counsel re: Rule 30(b)(6) notice for CDR and other issues	0.1	\$550.00	\$55.00
03/30/21	PA	Draft Rule 30(b)(6) notice for CDR, adapting notice from Jammeh v. HNN	1.0	\$550.00	\$550.00
03/31/21	SL	Call w client regarding discovery responses	1.1	\$495.00	\$544.50
04/02/21	PA	Review email from Sam Leonard re: draft discovery and make suggested changes/forward to Blythe Chandler	0.1	\$550.00	\$55.00
04/08/21	SL	Email to Thrive and CDR	0.2	\$495.00	\$99.00
04/09/21	BHC	Worked on Rule 30(b)(6) Notice to CDR [.3].	0.3	\$495.00	\$148.50
04/19/21	SL	Emailing with Client RE Discovery	0.2	\$495.00	\$99.00
04/26/21	BHC	Video conference with co-counsel regarding case management [.4]. Telephone conference with co-counsel regarding same [.3].	0.3	\$495.00	\$148.50
04/26/21	SL	Drafting discovery responses	0.3	\$495.00	\$148.50
04/26/21	SS	Reviewed and analyzed Complaint.	0.4	\$325.00	\$130.00
04/27/21	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
04/27/21	SL	Discovery call with Thrive	0.5	\$495.00	\$247.50
04/28/21	SL	Drafting discovery responses	2.6	\$495.00	\$1,287.00
04/28/21	SS	Reviewed and analyzed letter from opposing counsel on discovery from CDR.	0.3	\$325.00	\$97.50
04/28/21	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

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/28/21	SS	Reviewed cases cited by opposing counsel in discovery letter.	0.9	\$325.00	\$292.50
04/28/21	SS	Commenced research on pre certification discovery requests.	0.4	\$325.00	\$130.00
04/28/21	SS	Drafted email regarding research question and scope of discovery letter;	0.3	\$325.00	\$97.50
04/28/21	SS	Researched issue of pre certification discovery in Washington state courts.	1.0	\$325.00	\$325.00
04/28/21	SS	Commenced drafting letter in response to opposing counsel regarding discovery RFPs No. 3, 4, 5, and 12.	0.4	\$325.00	\$130.00
04/28/21	SS	Reviewed Answer and Counterclaims to determine relevant class definitions.	0.2	\$325.00	\$65.00
04/29/21	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
04/29/21	HMR	Submitted motion to voluntary dismiss third-party defendant Jose Salas via ex parte twice.	0.5	\$125.00	\$62.50
04/29/21	PA	Review and respond to email from Sam Leonard re: discovery issue (bank records)	0.1	\$550.00	\$55.00
04/29/21	SS	Drafted letter to opposing counsel regarding RFPs No. 3, 4, 5, and 12.	0.5	\$325.00	\$162.50
04/29/21	SS	Edited draft letter to opposing counsel on RFPs 3, 4, 5, and 12.	0.3	\$325.00	\$97.50
04/29/21	SS	Drafted email to partner sending draft letter re discovery.	0.2	\$325.00	\$65.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/30/21	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
04/30/21	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
05/03/21	SS	Reviewed CDR's responses to first set of interrogatories and requests for production.	0.5	\$325.00	\$162.50
05/05/21	SL	Reviewing Client email accounts	1.2	\$495.00	\$594.00
05/05/21	SL	Call with BC regarding emails	0.3	\$495.00	\$148.50
05/06/21	ET	Downloaded and organized client's emails [3]	3.0	\$125.00	\$375.00
05/07/21	BHC	Meeting with co-counsel regarding discovery, document review, and case management [.6].	0.3	\$495.00	\$148.50
05/07/21	SS	Edited draft discovery letter to CDR.	0.5	\$325.00	\$162.50
05/07/21	SS	Reviewed draft discovery correspondence and new requests for production to prepare for meeting.	0.6	\$325.00	\$195.00
05/07/21	SS	Video conference regarding draft discovery letters, draft requests for production.	0.5	\$325.00	\$162.50
05/10/21	SS	Reviewed discovery produced by CDR.	0.8	\$325.00	\$260.00
05/11/21	SS	Commenced reviewing disclosures by Columbia Debt Recovery - CollectOne handbook.	0.5	\$325.00	\$162.50
05/18/21	BHC	Video conference with co-counsel regarding client discovery responses and related matters [.7].	0.3	\$495.00	\$148.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/19/21	JN	Reviewed email regarding production of client documents and prepared response to same. [1]	0.1	\$195.00	\$19.50
05/19/21	PA	Review and revise meet and confer letter to CDR	0.2	\$550.00	\$110.00
05/19/21	PA	Zoom meeting with Sam Leonard, Blythe Chandler and Sarah Smith	0.8	\$550.00	\$440.00
05/19/21	SL	Call with Co counsel	0.8	\$495.00	\$396.00
05/19/21	SL	Reviewing Pierce Emails located in TM search	0.8	\$495.00	\$396.00
05/19/21	SS	Finalized discovery letter to CDR; emailed same for sending.	0.3	\$325.00	\$97.50
05/19/21	SS	Reviewed suggested edits to discovery letter to CDR.	0.3	\$325.00	\$97.50
05/19/21	SS	Reviewed edits to discovery letter to CDR [2].	0.2	\$325.00	\$65.00
05/19/21		Edited discovery letter to CDR to include request for communications between it and Thrive.	0.2	\$325.00	\$65.00
05/19/21	SS	Video conference with counsel on case strategy and outstanding discovery.	0.3	\$325.00	\$97.50
05/19/21	TS	Finalized ltr to B. Fisher [2].	0.2	\$125.00	\$25.00
05/20/21	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
05/20/21	PA	Phone calls with Sam Leonard/Blythe Chandler re: client status	0.2	\$550.00	\$110.00
05/20/21	SL	Reviewing client records	1.6	\$495.00	\$792.00
05/20/21	SL	Call with co-counsel re discovery	0.4	\$495.00	\$198.00
05/20/21	SS	Reviewed suggested edits to discovery letter to CDR from co-counsel.	0.5	\$325.00	\$162.50
05/20/21	SS	Finalized edits to discovery letter to CDR.	0.3	\$325.00	\$97.50
05/20/21	SS	Reviewed and finalized discovery letters to Belkorp and CDR.	0.1	\$325.00	\$32.50
05/20/21	TS	Finalized ltr. to B. Fisher [1].	0.1	\$125.00	\$12.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/21/21	PA	Phone call with Donte Gardiner and Sam Leonard	0.2	\$550.00	\$110.00
05/21/21	SL	Call with client regarding discovery	0.4	\$495.00	\$198.00
05/21/21	SL	Call with co-counsel re discovery	0.3	\$495.00	\$148.50
05/24/21	BHC	Exchanged numerous emails with co-counsel regarding discovery matters and scheduled meet and confer [3].	0.1	\$495.00	\$49.50
05/25/21	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
05/25/21	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
05/25/21	SL	Emailing and talking with co-counsel on CDR discovery issues.	0.5	\$495.00	\$247.50
05/26/21	HMR	Worked on and finalized letter to Brad Fisher regarding discovery; emailed same to counsel and co-counsel.	0.4	\$125.00	\$50.00
05/26/21	PA	Review and respond to multiple emails regarding Brad Fisher complaints about our clients' discovery responses. Review Brad Fisher letter and our discovery	0.4	\$550.00	\$220.00
05/26/21	SS	Reviewed discovery letters in preparation for conferences.	0.3	\$325.00	\$97.50
05/27/21	BET	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

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/27/21	JN	Reviewed email from Mr. Fisher regarding meet and confer and responses to same.[.1]	0.1	\$195.00	\$19.50
05/27/21	PA	Review Brad Fisher email re: postponing phone call, draft proposed response, and circulate to co-counsel	0.1	\$550.00	\$55.00
05/27/21	PA	Zoom call to meet and confer with Brad Fisher re: CDR discovery issues. No charge b/c my microphone malfunctioned	0.0	\$550.00	\$0.00
05/27/21	PA	Zoom call with Beth Terrell, Sarah Smith and Sam Leonard re: CDR discovery and other issues	0.5	\$550.00	\$275.00
05/27/21	SL	CDR discovery call	1.0	\$495.00	\$495.00
05/27/21	SL	Reviewing client documents	0.8	\$495.00	\$396.00
05/27/21	SS	Prepared for discovery conference with CDR.	0.5	\$325.00	\$162.50
05/27/21	SS	Discovery conference with Mr. Fisher on Columbia Debt Recovery's discovery responses.	0.9	\$325.00	\$292.50
05/27/21	SS	Video conference with co-counsel to debrief on discovery call with Columbia Debt Recovery.	0.5	\$325.00	\$162.50
05/28/21	JN	Reviewed email from Mr. Fisher regarding plaintiffs' depositions and response to same.[.1];	0.1	\$195.00	\$19.50
05/28/21	JN	Reviewed emails regarding review of client emails and responses to same.[.1].	0.1	\$195.00	\$19.50
05/28/21	PA	Review and edit confirming letter to Brad Fisher re: CDR discovery	0.3	\$550.00	\$165.00
05/28/21	SL	Drafting discovery letter and reviewing CDR discovery	0.8	\$495.00	\$396.00
05/28/21	SS	Email to Mr. Fisher on Columbia Debt Recovery discovery call.	0.9	\$325.00	\$292.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/28/21	SS	Incorporated suggestions into email to Brad Fisher on discovery call.	0.4	\$325.00	\$130.00
05/28/21	SS	Incorporated edits into email to Brad Fisher on discovery call.	0.2	\$325.00	\$65.00
05/28/21	SS	Finalized emails and circulated for review.	0.2	\$325.00	\$65.00
06/01/21	SL	Reviewing Gardiner Emails	0.6	\$495.00	\$297.00
06/02/21	BHC	Telephone conference with co-counsel regarding client email production [.5].	0.5	\$495.00	\$247.50
06/02/21	PA	Phone call with Sam Leonard re case status and possible amended pleadings	0.8	\$550.00	\$440.00
06/02/21	PA	Phone call with Blythe Chandler and Sam Leonard re: counterclaimant depositions and amending the answer	0.9	\$550.00	\$495.00
06/02/21	SL	Call with Co-counsel RE Discovery, depositions and amendment.	1.0	\$495.00	\$495.00
06/02/21	SS	Reviewed letter from OC on discovery conference and disputes.	0.3	\$325.00	\$97.50
06/03/21	BHC	Discussed client deposition scheduling with co-counsel [.5]. Worked with staff on document production [.2].	0.3	\$495.00	\$148.50
06/03/21	PA	Review and draft lengthy response to Bard Fisher June 2, 2021 letter re: discovery, including researching	1.2	\$550.00	\$660.00
06/03/21	SL	Review Gardiner Email	2.1	\$495.00	\$1,039.50
06/03/21	SS	Reviewed and analyzed letter from opposing counsel following up on discovery call.	0.3	\$325.00	\$97.50
06/03/21	SS	Reviewed draft email from co-counsel.	0.3	\$325.00	\$97.50
06/04/21	BHC	Reviewed discovery correspondence from Mr. Fisher; email to co-counsel regarding same [.4].	0.4	\$495.00	\$198.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
06/04/21	SL	Emailing with co-counsel and opposing counsel regarding deposition scheduling	0.2	\$495.00	\$99.00
06/07/21	BHC	Worked on primary witness disclosure [.8].	0.4	\$495.00	\$198.00
06/07/21	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
06/07/21	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
06/08/21	BET	Discussed response to Mr. Fisher's letter with Ms. Chandler [.2]	0.2	\$550.00	\$110.00
06/08/21	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
06/08/21	BHC	Worked on Rule 30(b)(6) notice [.8].	0.8	\$495.00	\$396.00
06/08/21	PA	Review and comment on draft letter to Brad Fisher re: discovery	0.1	\$550.00	\$55.00
06/09/21	BHC	Worked on letter to Mr. Fisher regarding discovery matters and sent same [.1].	1.0	\$495.00	\$495.00
06/09/21	BHC	Video conference with co-counsel regarding case management [.6].	0.3	\$495.00	\$148.50
06/09/21	PA	Conference call with Sarah Smith, Beth Terrell, Blythe Chandler and Sam Leonard re: case status, discovery and planning	0.4	\$550.00	\$220.00
06/09/21	SL	Strategy meeting - Discovery and class cert	0.8	\$495.00	\$396.00
06/09/21	SL	Call with client regarding discovery	0.8	\$495.00	\$396.00
06/09/21	SL	Reviewing CDR Discovery Responses	0.4	\$495.00	\$198.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
06/09/21	SS	Video conference with co-counsel.	0.4	\$325.00	\$130.00
06/10/21	SL	Editing discovery letter to CDR	0.2	\$495.00	\$99.00
06/10/21	SL	Call with PA RE: Class Reps CDR	0.2	\$495.00	\$99.00
06/10/21	SS	Researched futlity standard for motions to amend [1]; edited motion to amend [.6].	0.8	\$325.00	\$260.00
06/10/21	SS	Reviewed Answer and Counterclaim Defendants' Answers [.6]; motion to amend [1.4].	1.0	\$325.00	\$325.00
06/11/21	HMR	Worked on declaration of Blythe H. Chandler in support of motion for leave to amend answer.	0.1	\$125.00	\$12.50
06/11/21	SS	Research on futlity standard for motion to amend [.5]; motion to amend drafting [.5].	0.5	\$325.00	\$162.50
06/14/21	BHC	Worked on case schedule issues [.2]. Worked on motion for leave to amend answer and counterclaims [.2].	0.2	\$495.00	\$99.00
06/14/21	SS	Incorporated edits into motion to amend.	0.2	\$325.00	\$65.00
06/16/21	BHC	Responded to Mr. Fisher's request to extend time to provide supplemental class data [.2].	0.2	\$495.00	\$99.00
06/17/21	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
06/18/21	BHC	Email to Mr. Fisher regarding client supplement [.1].	0.1	\$495.00	\$49.50
06/18/21	SL	Preparing client supplemental responses	1.8	\$495.00	\$891.00
06/22/21	ET	Reviewed production for personal information to redact [0.5]	0.5	\$125.00	\$62.50

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
06/22/21	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
		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].			
06/23/21	SS	counsel [:2].	0.4	\$325.00	\$130.00
06/24/21	SL	Preparing Gardiner Supplemental Production	0.8	\$495.00	\$396.00
06/24/21	SL	Call with client regarding discovery	0.5	\$495.00	\$247.50
06/28/21	SL	Reviewing Motion to Continue and Decl.	0.2	\$495.00	\$99.00
06/29/21	SS	Edited motion to amend case schedule.	0.3	\$325.00	\$97.50
		Edited draft motion to amend case schedule [1.4]; email circulating draft motion to amend [:1].			
06/30/21	SS		0.7	\$325.00	\$227.50
		Review and respond to email from Sam Leonard re: claims against CDR			
07/01/21	PA		0.1	\$550.00	\$55.00
07/01/21	SL	Emailing with clients	0.3	\$495.00	\$148.50
07/01/21	SL	Emailing with co-counsel regarding MTA	0.2	\$495.00	\$99.00
		Review emails from Brad Fisher regarding amended complaint and exchange multiple emails with co-counsel re: how to respond.			
07/02/21	PA		0.1	\$550.00	\$55.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
		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
07/26/21	BHC	Email to Mr. Fisher regarding deposition schedule [.2].	0.2	\$495.00	\$99.00
08/03/21	SL	Call with BC on status and next steps	0.3	\$495.00	\$148.50
		Exchanged emails with co-counsel regarding case strategy and discovery			
08/05/21	BHC	[.2].	0.1	\$495.00	\$49.50
08/05/21	JAL	Worked on drafting deposition notice [1.1].	1.1	\$150.00	\$165.00
		Reviewing Thrive discovery responses and emailing with PA	0.1	\$495.00	\$49.50
08/05/21	SL	Emailing with Co-counsel RE: [External] Pierce v. Thrive Communities Moveout Statement Revi	0.2	\$495.00	\$99.00
		Email to co-counsel regarding client deposition dates [.1]. Exchanged			
08/06/21	BHC	emails with co-counsel regarding statute of limitations matters [.1].	0.2	\$495.00	\$99.00
		Revised requests for admissions from co-counsel [.9]; final review of			
08/10/21	SS	requests for production and interrogatories [.2]; email circulating ROGs and RFPs to co-counsel [.1].	1.2	\$325.00	\$390.00
		Worked on amended Rule 30(b)(6) notice to CDR for service [.1].	0.1	\$495.00	\$49.50
08/11/21	BHC	Exchanged emails with co-counsel regarding client deposition scheduling			
08/11/21	BHC	[.2].	0.2	\$495.00	\$99.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
08/11/21	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
08/12/21	BHC	Revised Rule 30(b)(6) notice and approved same for service [.2]. Reviewed Columbia Debt Recovery's objections to 30(b)(6) deposition notice topics [.2].	0.2	\$495.00	\$99.00
08/20/21	SS	Exchanged emails with Mr. Fisher regarding remote deposition exhibit protocol [.2].	0.2	\$325.00	\$65.00
08/27/21	BHC	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
08/31/21	SL	Gardiner Deposition Prep	1.6	\$495.00	\$792.00
08/31/21	SL	Dep prep	1.5	\$495.00	\$742.50
09/01/21	SL	Reviewing production from CDR	1.0	\$495.00	\$495.00
09/01/21	SL	Legal Research Joint Defense Privilege	0.8	\$495.00	\$396.00
09/02/21	PA	Followed entire deposition of Jordan Pierce but am only billing an hour for my comments and assistance to Sam Leonard.	1.0	\$550.00	\$550.00
09/02/21	SL	Jordan Pierce Deposition	5.0	\$495.00	\$2,475.00
09/02/21	SL	Jordan Pierce Deposition Prep	1.2	\$495.00	\$594.00
09/02/21	SL	Deposition Prep	1.1	\$495.00	\$544.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
09/03/21	SL	Dep. Donte Gardiner	4.2	\$495.00	\$2,079.00
09/03/21	SL	Reviewing client emails	0.6	\$495.00	\$297.00
09/05/21	BHC	Worked on CDR Rule 30(b)(6) outline.	5.9	\$495.00	\$2,920.50
09/06/21	PA	Review CDR deposition outline and email comments to co-counsel	0.2	\$550.00	\$110.00
09/07/21	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 [.5].	2.1	\$495.00	\$1,039.50
09/07/21	JJB	Worked on deposition preparation.	1.7	\$175.00	\$297.50
09/07/21	SL	Editing and drafting CDR Dep Questions.	1.6	\$495.00	\$792.00
09/07/21	SL	Reviewing letter from Brad Fisher and drafting proposed response.	0.3	\$495.00	\$148.50
09/08/21	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
09/08/21	JJB	Telephone conferences regarding deposition exhibits; prepared deposition exhibits.	0.5	\$175.00	\$87.50
09/08/21	SL	CDR Dep.	5.5	\$495.00	\$2,722.50
09/08/21	SS	Observed Rule 30(b)(6) deposition of Columbia Debt Recovery [.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].	3.0	\$325.00	\$975.00
09/09/21	PA	Conference call with co-counsel to discuss strategy	0.5	\$550.00	\$275.00
09/09/21	SL	Next steps and status	0.5	\$495.00	\$247.50

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
09/09/21	SS	Video conference with co-counsel following 30(b)(6) deposition [6].	0.6	\$325.00	\$195.00
09/16/21	BHC	Draft stipulation and proposed order to amend class certification briefing schedule; circulated same to all counsel [1.5]. Discussed strategy with co- counsel [1.1].	0.8	\$495.00	\$396.00
09/16/21	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
09/17/21	BHC	Worked on subpoena to Saint Newton [2].	0.2	\$495.00	\$99.00
09/17/21	JAL	Worked on drafting deposition subpoena [1.6].	1.6	\$150.00	\$240.00
09/20/21	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
09/20/21	JAL	Worked on drafting and serving subpoena [1.9].	1.9	\$150.00	\$285.00
09/21/21	JAL	Worked on loading production [0.9].	0.9	\$150.00	\$135.00
09/29/21	SL	Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	1.2	\$495.00	\$594.00
09/30/21	SL	Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	1.2	\$495.00	\$594.00
10/04/21	SS	Reviewed letter from counsel for Saint Newton [1].	0.1	\$325.00	\$32.50
10/11/21	AMS	Strategy conference about class certification, worked on motion [7.3].	3.6	\$550.00	\$1,980.00
10/11/21	PA	Review and respond to emails regarding briefing rules	0.1	\$550.00	\$55.00
10/11/21	SL	Reviewing transcript of Gardiner Dep	1.3	\$495.00	\$643.50
10/12/21	AMS	Worked on class certification motion, strategy conferences [9.8].	4.9	\$550.00	\$2,695.00
10/12/21	BHC	Worked on motion for class certification.	2.0	\$495.00	\$990.00

Date	Initials	Narrative	Units	Rate	Value
10/12/21	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
10/12/21	PA	Phone call with co-counsel re: class certification issues	0.5	\$550.00	\$248.00
10/13/21	AMS	Worked on class certification motion and supporting declarations [8.8].	4.4	\$550.00	\$2,420.00
10/13/21	BHC	Worked on Plaintiffs' motion for class certification [5.4].	2.7	\$495.00	\$1,336.50
10/14/21	AMS	Worked on class certification motion and supporting documents [7.2].	3.6	\$550.00	\$1,980.00
10/14/21	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
10/14/21	HB	Worked on declaration and exhibits in support of motion for class certification [8.2].	4.1	\$150.00	\$615.00
10/14/21	PA	Review and edit class cert brief, including emailing preliminary comments to co-counsel	0.3	\$550.00	\$165.00
10/14/21	PA	Make edits and corrections to class cert. brief and email to co-counsel	0.3	\$550.00	\$138.00
10/14/21	SL	Drafting Declarations	2.1	\$495.00	\$1,039.50
10/14/21	SL	Call with client regarding declarations	0.3	\$495.00	\$148.50
10/15/21	AMS	Worked on class certification motion and supporting documents [7.6].	3.8	\$550.00	\$2,090.00
10/15/21	BHC	Telephone conference with Mr. Fisher regarding confidentiality designations [.1].	0.1	\$495.00	\$49.50

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
10/15/21	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
10/15/21	SL	Editing motion for cert .9, review and editing declarations. 3	0.9	\$495.00	\$445.50
10/18/21	HB	Prepared sealed documents for delivery to the Judge's Mailroom [7].	0.3	\$150.00	\$45.00
10/22/21	SS	Reviewed responses to motion to seal and related documents [1]; reviewed proposed discovery requests [2].	0.6	\$325.00	\$195.00
10/25/21	SS	Reply to Columbia Debt Recovery motion to seal exhibits ISO motion for class certification.	2.0	\$325.00	\$650.00
10/25/21	SS	Reviewed and analyzed responses to motion to seal [1]; researched case-law on motions to seal [1].	1.0	\$325.00	\$325.00
10/26/21	BHC	Worked on replies in support of motions to seal or file in open court.	0.3	\$495.00	\$148.50
10/26/21	SS	Proofread replies.	0.3	\$325.00	\$97.50
11/12/21	SS	Reviewed responses to class certification motion.	1.0	\$325.00	\$325.00
11/15/21	SS	Outlined potential evidentiary and legal arguments for reply to CDR response to class cert motion.	1.0	\$325.00	\$325.00
11/16/21	SS	Email summarizing potential arguments for replies ISO motion for class certification.	0.5	\$325.00	\$162.50
11/17/21	SS	Reviewed CDR response brief [5]; outlined reply to CDR [1.7].	2.3	\$325.00	\$747.50

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
11/18/21	SS	Research for reply to CDR response to class certification [2.1]; outlined reply [5].	2.6	\$325.00	\$845.00
11/18/21	SS	Outlined reply to CDR response to motion for class certification [7]; commenced drafting reply [4].	1.1	\$325.00	\$357.50
11/18/21	SS	Reply to CDR response to class certification.	0.5	\$325.00	\$162.50
11/18/21	SS	Reply to CDR opposition to class certification.	0.8	\$325.00	\$260.00
11/19/21	SS	Reply to CDR opposition to motion for class certification.	1.7	\$325.00	\$552.50
11/22/21	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
11/22/21	SS	CDR reply brief.	1.5	\$325.00	\$487.50
11/22/21	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
11/23/21	SS	CDR reply brief in support of class certification [4.3].	4.3	\$325.00	\$1,397.50
11/24/21	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
11/24/21	PA	Zoom call with co-counsel re; strategy for class cert. motion reply briefs	0.5	\$550.00	\$248.00
11/24/21	SS	Reply to CDR opposition to class certification.	1.5	\$325.00	\$487.50
11/24/21	SS	Video conference with co-counsel on class cert reply strategy.	0.4	\$325.00	\$130.00
11/29/21	BHC	Worked on reply in support of certification on CDR classes [1.3].	1.3	\$495.00	\$643.50

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
11/29/21	BHC	Telephone conference with co-counsel regarding legal research related to reply briefs [1.2].	0.2	\$495.00	\$99.00
11/29/21	AAA	Personal conference regarding research issues for class certification replies [0.2]; worked on research issues [3.4].	3.6	\$425.00	\$1,530.00
11/29/21	SS	Reviewed and incorporated edits to CDR reply.	1.4	\$325.00	\$455.00
11/30/21	AAA	Completed research regarding for reply briefs in support of class certification [1.8]; email correspondence regarding same [0.2].	2.0	\$425.00	\$850.00
11/30/21	SS	Edits to CDR reply.	0.7	\$325.00	\$227.50
11/30/21	SS	CDR reply brief.	1.8	\$325.00	\$585.00
11/30/21	SS	CDR reply brief.	0.7	\$325.00	\$227.50
12/01/21	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
12/01/21	AAA	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
12/01/21	SS	CDR reply brief.	1.0	\$325.00	\$325.00
12/02/21	AMS	Worked on class certification replies, strategy conference, drafted revised proposed order [5.8].	1.9	\$550.00	\$1,045.00
12/02/21	HB	Worked on declaration and exhibits in support of class cert reply [2.0].	0.7	\$150.00	\$105.00
12/02/21	PA	Review and revise reply memo re: CDR opposition to class certification.	0.7	\$550.00	\$385.00
12/03/21	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

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
12/03/21	HB	Worked on finalizing declaration, exhibits, and other supporting documents for class cert reply [4].	0.1	\$150.00	\$15.00
12/03/21	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
12/03/21	SL	Reviewing and editing briefs.	0.4	\$495.00	\$198.00
12/17/21	BHC	Exchanged emails with all counsel regarding hearing date for motion for class certification [4].	0.2	\$495.00	\$99.00
01/03/22	BHC	Email to Judge Galvan's chambers requesting date for class certification hearing [2].	0.1	\$495.00	\$49.50
01/14/22	BHC	Reviewed order on change of judge and exchanged emails with co-counsel regarding same [2].	0.1	\$495.00	\$49.50
01/21/22	BHC	Worked with staff and co-counsel on production of working copies for Judge McCoy [6].	0.2	\$495.00	\$99.00
01/21/22	ET	Created binders of working copies for judge, and arranged for delivery to court on Monday [3,5]	1.2	\$125.00	\$150.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
02/02/22	BET	Exchanged emails with Ms. Chandler regarding scheduling oral argument on class certification [1.2]. Discussed class certification argument scheduling with Ms. Terrell [1.2].	0.4	\$550.00	\$220.00
02/02/22	BHC	Exchanged emails with Ms. Terrell regarding scheduling oral argument on class certification [1.2].	0.1	\$495.00	\$49.50
02/02/22	BHC	Discussed class certification argument scheduling with Ms. Terrell [1.2].	0.1	\$495.00	\$49.50
02/21/22	BET	Telephone conference with Ms. Chandler regarding class certification argument outline [1.5].	0.5	\$550.00	\$275.00
02/21/22	BHC	Worked on oral argument outline [4.8]. Telephone conference with Ms. Terrell regarding class certification argument outline [1.5].	1.7	\$495.00	\$841.50
02/22/22	AMS	Class certification hearing prep [1.4].	0.4	\$550.00	\$220.00
02/22/22	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
02/22/22	BHC	Email memo to co-counsel regarding class certification hearing preparation [1.5]. Class certification preparation meeting with co-counsel [1.1].	0.5	\$495.00	\$247.50
02/22/22	HB	Gathered documents for class certification preparation [1.2].	0.1	\$150.00	\$15.00
02/23/22	BET	Prepared for argument on motion for class certification [4.8]	2.4	\$550.00	\$1,320.00
02/23/22	SS	Case summaries for oral argument prep.	1.1	\$325.00	\$357.50
02/24/22	BET	Prepared for argument on motion for class certification [6.6]	3.3	\$550.00	\$1,815.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
02/25/22	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
02/25/22	SL	Hearing - Motion for Certification	0.5	\$495.00	\$247.50
02/25/22	SL	Call RE Motion for Certification Hearing	1.5	\$495.00	\$742.50
02/28/22	BHC	Checked docketing for appeal deadlines related to denial of class certification [3].	0.1	\$495.00	\$49.50
03/01/22	BHC	Read class certification hearing transcript; discussed same with co-counsel [9].	0.4	\$495.00	\$198.00
03/01/22	SS	Reviewed and analyzed transcript of class certification hearing.	0.4	\$325.00	\$130.00
03/02/22	BHC	Video conference with co-counsel to discuss strategy in light of class certification ruling [6].	0.3	\$495.00	\$148.50
03/02/22	PA	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	0.5	\$550.00	\$275.00
03/02/22	PA	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	0.5	\$550.00	\$275.00
03/28/22	PA	Review and respond to email from Blythe Chandler re: appeal and settlement.	0.1	\$550.00	\$28.00
03/28/22	PA	Review and respond to email from Sam Leonard re: settlement offer and appeal.	0.1	\$550.00	\$28.00
04/08/22	BHC	Worked with staff on filing notice of request for discretionary review [4].	0.2	\$495.00	\$99.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/14/22	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
04/18/22	AMS	Worked on motion for discretionary review, related research, strategy conference [7.6].	2.5	\$550.00	\$1,375.00
04/19/22	AMS	Worked on motion for discretionary review, related research [4.7].	1.6	\$550.00	\$880.00
04/20/22	AMS	Worked on motion for discretionary review, related research [6.4].	2.1	\$550.00	\$1,155.00
04/22/22	AMS	Worked on motion for discretionary review [7.8].	2.6	\$550.00	\$1,430.00
04/25/22	AMS	Worked on motion for discretionary review, related research [9.2].	3.0	\$550.00	\$1,650.00
04/25/22	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
04/25/22	SS	Drafted introduction, facts section of motion to stay.	1.3	\$325.00	\$422.50
04/25/22	SS	Researched standard of review for motion to stay pending appeal.	1.2	\$325.00	\$390.00
04/25/22	SS	Motion to stay pending resolution of motion for discretionary review argument section.	1.3	\$325.00	\$422.50
04/26/22	AMS	Worked on motion for discretionary review, related research, worked on appendix, related strategy conference [9.2].	3.0	\$550.00	\$1,650.00
04/27/22	BHC	Worked on motion for discretionary review [7]. Worked on motion to stay [5].	0.4	\$495.00	\$198.00
04/27/22	JN	Worked on clerk's papers for motion for discretionary review.[4]	0.1	\$195.00	\$19.50
04/27/22	SS	Motion to stay.	0.5	\$325.00	\$162.50
04/27/22	SS	Declaration in support of motion to stay.	0.3	\$325.00	\$97.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/28/22	AA	Worked on appendix for motion to stay.	0.3	\$125.00	\$37.50
04/28/22	JN	Worked on motion for discretionary review[2]	0.7	\$195.00	\$136.50
04/28/22	JN	Continued working on appendix to motion for discretionary review	0.9	\$195.00	\$175.50
04/28/22	PA	Review and revise motion for discretionary review	0.8	\$550.00	\$413.00
04/28/22	SL	Editing Motion for Discretionary Review	0.9	\$495.00	\$445.50
04/29/22	AMS	Finalized motion for discretionary review and appendix [6.6].	2.2	\$550.00	\$1,210.00
04/29/22	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
04/29/22	JAL	Worked on appendix index [2.1].	0.7	\$150.00	\$105.00
05/02/22	BHC	Worked on motion to stay; email to memo to co-counsel regarding same.	0.1	\$495.00	\$49.50
05/09/22	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
05/09/22	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
05/10/22	EAA	Email correspondence regarding reply in support of motion to stay.	0.3	\$425.00	\$127.50
05/10/22	SS	Continued review of sample briefing on issue of individual liability in FD CPA, CPA claims.	0.3	\$325.00	\$97.50
05/10/22	SS	Reviewed sample briefing on individual liability [6]; reviewed case-law for reply ISO motion to stay [7].	1.3	\$325.00	\$422.50
05/11/22	SS	Edited reply ISO motion to stay pending resolution of motion for discretionary review.	1.3	\$325.00	\$422.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/18/22	BHC	Exchanged emails with co-counsel and opposing counsel regarding potential stipulation involving Wojdak [2].	0.2	\$495.00	\$99.00
05/27/22	BHC	Exchanged emails with co-counsel and counsel for Wojdak regarding potential stay [2].	0.2	\$495.00	\$99.00
06/03/22	BHC	Exchanged emails with Mr. Fisher regarding stipulation to stay [1].	0.1	\$495.00	\$49.50
06/06/22	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
06/06/22	SS	Stipulation re stay of proceedings against William Wojdak pending resolution of motion for discretionary review.	0.5	\$325.00	\$162.50
06/10/22	AMS	Worked on replies to three oppositions to motion for discretionary review [9.4].	3.1	\$550.00	\$1,705.00
06/11/22	AMS	Worked on responses to three oppositions to motion for discretionary review [15.2].	5.0	\$550.00	\$2,750.00
06/12/22	AMS	Worked on discretionary review replies [3.0].	1.0	\$550.00	\$550.00
06/13/22	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
06/13/22	SS	Email to B. Fisher re stip.	0.2	\$325.00	\$65.00
06/13/22	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
06/13/22	SS	Created clean copies of stip and proposed order [1]; reviewed and approved finals for filing [2].	0.3	\$325.00	\$97.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
06/14/22	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
06/16/22	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
06/23/22	BHC	Worked in reply in support of motion for discretionary review [1.5].	0.5	\$495.00	\$247.50
06/23/22	PA	Review and revise reply memo on motion for discretionary review	0.3	\$550.00	\$165.00
06/27/22	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
06/27/22	SS	Reviewed final reply iso motion for discretionary review. Stipulation extending stay pending resolution of mtn for discretionary review.	0.2	\$325.00	\$65.00
08/19/22	SS	Revised draft stipulation on case schedule [2]; discussed same with Ms. Terrell [2].	0.7	\$325.00	\$227.50
08/22/22	BHC	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
08/23/22	SS	Email recirculating original stipulation [2]; updated stipulation and proposed order re same [2].	0.4	\$325.00	\$130.00
10/19/22	BHC	Video conference with co-counsel regarding case management [6].	0.3	\$495.00	\$148.50

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
10/19/22	PA	Phone call with Sam Leonard and Blythe Chandler re: denial of discretionary review and strategy going forward.	0.5	\$550.00	\$248.00
10/19/22	SL	Call with co-counsel RE Next Steps	0.6	\$495.00	\$297.00
10/20/22	SL	Next Steps - Call with PA	0.4	\$495.00	\$198.00
10/25/22	BHC	Video conference with co-counsel regarding case management [.5].	0.2	\$495.00	\$99.00
10/25/22	PA	Phone call with co-counsel re: strategy for status conference and further action	0.3	\$550.00	\$138.00
10/26/22	BHC	Discussed case management conference with Mr. Leonard [.1].	0.1	\$495.00	\$49.50
10/26/22	SL	Reviewing case history and preparing for status conference.	0.6	\$495.00	\$272.25
10/27/22	BHC	Prepared for status conference with Court [.2].	0.1	\$495.00	\$49.50
10/28/22	BHC	Status conference with Court [.2]. Telephone call with Mr. Leonard regarding same [.3].	0.2	\$495.00	\$99.00
10/28/22	SL	Status conference	0.2	\$495.00	\$74.25
11/03/22	PA	Begin discovery review to prepare for new class certification effort/email questions to co-counsel.	1.0	\$550.00	\$550.00
11/14/22	BHC	Analyzed issues and exchanged emails with co-counsel regarding potential amended complaint and case management [.3].	0.1	\$495.00	\$49.50
11/17/22	SL	Settlement offer	0.3	\$495.00	\$148.50
11/21/22	PA	Phone calls with Sam Leonard regarding responding to Thrive/CDR settlement offer	0.4	\$550.00	\$220.00
11/21/22	SL	Calls regarding settlement offer and next steps	0.5	\$495.00	\$247.50
11/21/22	SL	Calls regarding settlement offer and next steps	0.4	\$495.00	\$198.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
11/22/22	SL	Drafting letter to HIM regarding outstanding Thrive records related to CDR's claim against clients	0.6	\$495.00	\$297.00
		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].			
12/05/22	BHC	Leonard regarding same [.4].	0.9	\$495.00	\$445.50
12/21/22	SL	Emailing with co-counsel RE Status of discovery	0.1	\$495.00	\$49.50
12/28/22	SL	Editing TAC	1.0	\$495.00	\$470.25
		Drafting email to PA regarding motion to compel and law section of brief.			
01/03/23	SL	Call RE Move to Amend	0.3	\$495.00	\$123.75
01/03/23	SL	Drafting Motion to amend	0.2	\$495.00	\$99.00
01/03/23	SL	Drafting Motion to amend	0.5	\$495.00	\$247.50
01/04/23	SL	Drafting Motion to amend	0.8	\$495.00	\$371.25
01/06/23	SL	Editing Motion to Amend, Amended Counterclaims	0.9	\$495.00	\$445.50
		Review and respond to email from Brad Fisher re: proposed amended class counterclaim.			
01/10/23	PA		0.3	\$550.00	\$165.00
		Email co-counsel re: filing motion for leave to amend and discovery			
01/10/23	PA	Email to Brad fisher re: stipulating to filing of 3rd Amended Counterclaim	0.1	\$550.00	\$55.00
01/23/23	SL	Drafting Reply ISO Motion to Amend	1.6	\$495.00	\$792.00
01/30/23	PA	Review and organize prior discovery responses from CDR.	0.7	\$550.00	\$385.00
01/30/23	PA	Zoom call re: CDR discovery with co-counsel	0.3	\$550.00	\$165.00
01/30/23	SL	Call RE CDR Strategy	0.4	\$495.00	\$198.00
01/31/23	PA	Email to Brad Fisher re: prior CDR discovery objections	0.5	\$550.00	\$275.00
01/31/23	PA	Review and organize prior CDR discovery responses	1.0	\$550.00	\$550.00
		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.			
02/01/23	PA		2.1	\$550.00	\$1,155.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
02/03/23	PA	Draft second set of discovery requests for CDR, including reviewing prior discovery responses in this case and Jammeh v. HNN.	1.4	\$550.00	\$770.00
02/05/23	PA	Review discovery and complaint and start draft of discovery to do list	1.0	\$550.00	\$550.00
02/06/23	PA	Begin drafting motion to compel CDR to produce documents	0.9	\$550.00	\$495.00
02/06/23	PA	Review some of the prior discovery and email to co-counsel re: discovery issues	0.4	\$550.00	\$220.00
02/07/23	BHC	Video conference with co-counsel regarding discovery matters [.3].	0.1	\$495.00	\$49.50
02/07/23	PA	Continued drafting of motion to compel CDR to produce	1.4	\$550.00	\$770.00
02/07/23	PA	Zoom call re: discovery and other issues with Sam Leonard and Blythe Chandler	0.3	\$550.00	\$165.00
02/07/23	SL	Emails RE CDR	0.3	\$495.00	\$148.50
02/08/23	PA	Further drafting of motion to compel v. CDR, including emails with co-counsel	0.8	\$550.00	\$440.00
02/08/23	PA	Review email from Jeffery Hasson, speak with Blythe Chandler, send responsive email to all defendants	0.4	\$550.00	\$220.00
02/09/23	PA	Complete initial researching and draft of Motion to Compel CDR	3.0	\$550.00	\$1,650.00
02/14/23	PA	Phone call with Sam Leonard re: discovery phone call and new discovery to CDR and Thrive	0.1	\$550.00	\$55.00
02/14/23	PA	Meet and confer phone call with CDR (Jeff Hasson, Brad Fisher)	0.4	\$550.00	\$220.00
02/14/23	SL	Meet and Confer with BF and JH RE CDR discovery responses	0.5	\$495.00	\$247.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
02/16/23	SL	Editing 4th RFPs to Thrive	0.1	\$495.00	\$49.50
02/16/23	SL	Editing Motion to Compel and Discovery to Thrive	1.4	\$495.00	\$693.00
02/17/23	PA	Review and annotate email from Brad Fisher re: document production/forward to Sam Leonard	0.4	\$550.00	\$220.00
02/17/23	PA	Review and incorporate Sam Leonard revisions, select and organize exhibits and draft supporting declaration consistent with the final version of the motion.	2.3	\$550.00	\$1,265.00
02/20/23	PA	Draft response to Brad Fisher letter about discovery responses.	1.1	\$550.00	\$605.00
02/24/23	PA	Emails to counsel for Thrive and CDR re: filing a response	0.1	\$550.00	\$55.00
02/27/23	PA	Review and edit final version of discovery letter to Brad Fisher and Jeffery Hasson	0.2	\$550.00	\$110.00
02/27/23	PA	Phone call with Sam Leonard re: CDR discovery issues	0.1	\$550.00	\$55.00
02/27/23	PA	Review and edit meet and confer letter to CDR	0.3	\$550.00	\$165.00
02/27/23	SL	Reviewing Discovery and Drafting Letter to CDR RE Discovery	1.8	\$495.00	\$891.00
02/28/23	PA	Review and respond to email from Jeff Hasson re: resolving outstanding discovery disputes.	0.2	\$550.00	\$110.00
03/03/23	PA	Draft email confirming meet and confer phone call and including other discovery issues	0.7	\$550.00	\$385.00
03/06/23	PA	Review and respond to email from Blythe Chandler re: discovery order and very preliminary data results.	0.2	\$550.00	\$110.00
03/07/23	PA	Email to Jeff Hasson re: CDR discovery	0.1	\$550.00	\$55.00
03/10/23	PA	Quick review of CDR discovery responses and spreadsheet and review and respond to email from Sam Leonard regarding this discovery	0.3	\$550.00	\$165.00
03/10/23	SL	Reviewing CDR Discovery Responses	1.0	\$495.00	\$495.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
03/13/23	PA	Review discovery responses and email opposing counsel to meet and confer	0.2	\$550.00	\$110.00
03/14/23	PA	Email to Blythe Chandler and Beth Terrell re: discovery status.	0.2	\$550.00	\$110.00
03/14/23	PA	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.	0.4	\$550.00	\$220.00
03/14/23	PA	Research and begin revised draft of motion to compel v. CDR	1.2	\$550.00	\$660.00
03/14/23	PA	Review data compilation and respond to email from Jeff Hasson re: scheduling meet and confer phone call.	0.3	\$550.00	\$165.00
03/15/23	JR	Met and conferred with CDR regarding discovery requests [.4]; drafted and revised summary of meet and confer to send to CDR [.6].	1.0	\$275.00	\$275.00
03/15/23	PA	Review discovery and draft notes in preparation for meet and confer phone call	0.5	\$550.00	\$275.00
03/15/23	PA	Draft confirming letter re: meet and confer with Jeff Hasson, and send to Jasmin Rezale for review and editing	0.5	\$550.00	\$275.00
03/15/23	PA	Meet and confer phone call with Jeff Hasson and Jasmin Rezale	0.4	\$550.00	\$220.00
03/16/23	PA	Draft motion to compel CDR	2.9	\$550.00	\$1,595.00
03/19/23	PA	Complete initial draft of Motion to Compel v Columbia Debt Recovery/select and organize exhibits.	3.2	\$550.00	\$1,760.00
03/19/23	PA	Review Jeff Hasson email regarding CDR's practices, review deposition transcript and other evidence and send response	0.8	\$550.00	\$440.00
03/20/23	BHC	Video conference with co-counsel regarding case management and discovery progress [.5].	0.2	\$495.00	\$99.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
03/20/23	PA	Conference call with Blythe Chandler and Jasmin Resale re: case status	0.5	\$550.00	\$275.00
03/21/23	BHC	Worked on motion to compel CDR documents and data [1].	1.0	\$495.00	\$495.00
03/21/23	PA	Draft Declaration of Paul Arons in Support of Motion to Compel CDR Discovery	0.8	\$550.00	\$440.00
03/22/23	BHC	Reviewed and approved motion to compel CDR production and related documents for filing [4].	0.4	\$495.00	\$198.00
03/22/23	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
03/27/23	PA	Review and respond to email from Sam Leonard re: case status	0.1	\$550.00	\$55.00
03/28/23	BHC	Video conference with co-counsel regarding discovery management [1].	0.3	\$495.00	\$148.50
03/28/23	JR	Case management and strategy conference with co-counsel [1.1].	0.4	\$275.00	\$110.00
03/28/23	PA	Conference call with Blythe Chandler and Sam Leonard re: case status	0.6	\$550.00	\$303.00
03/28/23	SL	Cert Motion Strategy and Discovery CDR and Thrive	0.5	\$495.00	\$247.50
03/29/23	PA	Review CDR opposition to motion to compel discovery, research and being drafting reply brief	1.0	\$550.00	\$550.00
03/29/23	SL	Reviewing response to MTC and discovery in Jammeh for information on CDR's practices	1.1	\$495.00	\$544.50
03/30/23	PA	Email to Jeff Hasson re: correct referral date for Thrive accounts	0.1	\$550.00	\$55.00

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
03/30/23	PA	Complete first draft of memo in reply re: Mot to Compel CDR discovery	6.0	\$550.00	\$3,300.00
03/30/23	SL	Reviewing motion and facts in preparation of response.	3.2	\$495.00	\$1,584.00
03/31/23	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
03/31/23	BHC	Exchanged email with co-counsel regarding incorrect filing [.1]; telephone call with co-counsel regarding same [.1].	0.2	\$495.00	\$99.00
03/31/23	PA	Draft supplemental declaration in support of motion to compel	0.4	\$550.00	\$220.00
03/31/23	SL	Drafting Reply on MTC to CDR	1.3	\$495.00	\$643.50
04/03/23	BHC	Exchanged emails with co-counsel regarding late filed reply and stipulation [.2].	0.2	\$495.00	\$99.00
04/04/23	PA	Review Sam Leonard's email re: interpretation of CDR spreadsheet, review spreadsheet and respond.	0.3	\$550.00	\$165.00
04/04/23	SL	Reviewing CDR production RE class data	0.5	\$495.00	\$247.50
04/04/23	SL	Drafting correspondence to opposing counsel regarding cross motions for cert on CDR and sched	0.5	\$495.00	\$247.50
04/05/23	BHC	Read and analyzed CDR's motion to deny class certification [.1].	1.0	\$495.00	\$495.00
04/05/23	BHC	Video conference with co-counsel regarding case management [.6].	0.2	\$495.00	\$99.00
04/05/23	PA	Review and respond to email from Jodi Nuss (TMLG), re Thrive and CDR spreadsheet data analysis.	0.1	\$550.00	\$55.00
04/05/23	PA	Phone call with Blythe Chandler and Sam Leonard re: discovery strategy and opposition to motion to deny class certification	0.5	\$550.00	\$275.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/05/23	SL	Call with co-counsel RE Cert and CDR Records	0.4	\$495.00	\$198.00
04/06/23	PA	Review and analyze data and draft email with summary for Blythe Chandler	0.5	\$550.00	\$275.00
04/10/23	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
04/10/23	PA	Draft email to CDR counsel re: discussion of discovery order compliance, confirming agreement and identifying issues.	0.6	\$550.00	\$330.00
04/10/23	PA	Review and respond to email from Blythe Chandler : key word search terms.	0.1	\$550.00	\$55.00
04/10/23	PA	Draft confirming email re: Zoom conference with CDR counsel and forward to Blythe Chandler for review	0.3	\$550.00	\$165.00
04/10/23	PA	Phone call with Mark Case (CDR), Jeff Hasson and Blythe Chandler re: CDR discovery order	0.5	\$550.00	\$275.00
04/11/23	BHC	Research related to response to CDR's motion to deny class certification [1.5].	1.5	\$495.00	\$742.50
04/11/23	BHC	Exchanged emails with defense counsel regarding briefing schedules [.2].	0.1	\$495.00	\$49.50
04/11/23	PA	Phone call /w Sam Leonard re: CDR discovery issues.	0.2	\$550.00	\$110.00
04/11/23	SL	Call with co-counsel RE CDR Discovery call	0.3	\$495.00	\$148.50
04/13/23	PA	Review and respond to email from potential plaintiff v. CDR	0.2	\$550.00	\$110.00
04/13/23	PA	Review, research and respond to email from Brad Fisher re: word limits and filing deadlines for CDR's motion.	0.2	\$550.00	\$110.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/13/23	PA	Research substituting class plaintiff and send email to co-counsel.	1.2	\$550.00	\$660.00
04/13/23	PA	Review and respond to email from Blythe Chandler re: CDR request for extension.	0.1	\$550.00	\$55.00
04/13/23	SL	Emailing with co-counsel regarding briefing and discovery	0.3	\$495.00	\$148.50
04/14/23	PA	Review and respond to emails from potential plaintiff	0.2	\$550.00	\$110.00
04/14/23	PA	Draft email confirming substance of meet and confer phone call with CDR	0.4	\$550.00	\$220.00
04/14/23	PA	Phone call with potential plaintiff	0.3	\$550.00	\$165.00
04/14/23	PA	Phone call with Jeff Hasson, Mark Case and Sam Leonard re: discovery issues	1.1	\$550.00	\$605.00
04/14/23	PA	Phone call with Sam Leonard re: CDR discovery issues	0.5	\$550.00	\$275.00
04/14/23	SL	Call with co-counsel RE CDR Discovery Responses	0.5	\$495.00	\$247.50
04/14/23	SL	Call with opposing counsel RE Spoliation - CDR Putative class member account records	0.6	\$495.00	\$297.00
04/14/23	SL	Drafting confirming letter to CDR	1.0	\$495.00	\$495.00
04/15/23	PA	Continued drafting of motion to amend, including analysis of Gustov Cortez facts.	2.0	\$550.00	\$1,100.00
04/15/23	PA	Begin drafting motion for leave to amend.	0.5	\$550.00	\$275.00
04/16/23	PA	Complete drafting of 5th Amended Counterclaim	1.2	\$550.00	\$660.00
04/17/23	BHC	Worked on motion for leave to amend [1.9]; sent same to co-counsel [1.1].	2.0	\$495.00	\$990.00
04/17/23	PA	Review for new class plaintiffs	0.6	\$550.00	\$330.00
04/17/23	PA	Review edits to motion for leave to amend made by Blythe Chandler and Sharon Grace and begin revising the motion.	1.8	\$550.00	\$990.00
04/18/23	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

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/18/23	PA	Revise motion for leave to file amended complaint	1.7	\$550.00	\$935.00
04/18/23	PA	Review various emails regarding scheduling of motions to deny class certification and have conference call with co-counsel re: how to respond.	0.6	\$550.00	\$347.00
04/18/23	PA	Further revisions to motion for leave to amend	0.4	\$550.00	\$220.00
04/18/23	PA	Email to co-counsel re: motion for leave to amend	0.1	\$550.00	\$55.00
04/18/23	PA	Revise complaint to make it consistent with motion for leave to amend	0.4	\$550.00	\$220.00
04/18/23	PA	Email to CDR counsel re: production of data compilation.	0.1	\$550.00	\$55.00
04/18/23	SL	Call with co-counsel RE Responding to Motions to Deny Cert	0.3	\$495.00	\$148.50
04/19/23	BHC	Emails and telephone calls with co-counsel regarding 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
04/19/23	SL	Editing Motion to Amend	2.9	\$495.00	\$1,435.50
04/20/23	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
04/20/23	PA	Phone call with Sam Leonard to discuss CDR discovery issues and motion to deny class cert.	0.3	\$550.00	\$165.00
04/20/23	PA	Review and revise motion for leave to file motion for leave to file amended complaint and supporting declaration.	1.6	\$550.00	\$880.00
04/20/23	PA	Draft email to Jeff Hasson re: compliance with discovery order	0.5	\$550.00	\$275.00
04/20/23	SL	Reviewing spreadsheet from CDR	0.2	\$495.00	\$99.00
04/20/23	SL	Call with co-counsel RE CDR discovery	0.4	\$495.00	\$198.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/20/23	SL	Drafting Motion to Amend	1.0	\$495.00	\$495.00
04/21/23	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].	3.0	\$495.00	\$1,485.00
04/21/23	PA	Phone call with Jeff Hasson re: CDR compliance with discovery order.	0.3	\$550.00	\$165.00
04/21/23	PA	Phone call with Sam Leonard re: CDR compliance with discovery order.	0.3	\$550.00	\$165.00
04/21/23	PA	Review discovery and email Sam Leonard re: interest charges	0.2	\$550.00	\$110.00
04/21/23	SL	Drafting Response to CDR Motion to Deny Cert	6.1	\$495.00	\$3,019.50
04/24/23	PA	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	0.5	\$550.00	\$275.00
04/24/23	PA	Review and respond to email from Jeff Hasson arguing about language in the Stipulation Extending Time for CDR to Comply with Discovery Order	0.2	\$550.00	\$110.00
04/24/23	PA	Email co-counsel about potential call rep who is paid in full	0.1	\$550.00	\$55.00
04/24/23	PA	Phone call with Sam Leonard re: CDR data and responding to motion to deny class certification	0.2	\$550.00	\$110.00

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
04/25/23	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
04/25/23	PA	Review and respond to Brad Fisher proposal for concession in response to our request for a continuance.	0.6	\$550.00	\$330.00
04/25/23	PA	Review Blythe Chandler email call here re: Brad Fisher proposal for concessions in response to our request for a continuance.	0.2	\$550.00	\$110.00
04/25/23	PA	Zoom meeting with Blythe Chandler, Amanda Steiner and Sam Leonard to discuss motions to deny class certification	0.3	\$550.00	\$165.00
04/26/23	HB	Prepared a re-notice of hearing for motion for leave to amend [.4].	0.4	\$150.00	\$60.00
04/26/23	PA	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.	0.2	\$550.00	\$110.00
04/26/23	PA	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.	0.1	\$550.00	\$55.00
04/26/23	PA	Email to CDR counsel and counsel for all parties re: continuance	0.1	\$550.00	\$55.00
04/27/23	BHC	Email to all counsel regarding renoting motions [.2]; reviewed and approved renote for filing [.1].	0.1	\$495.00	\$49.50

EXHIBIT "C"

EXHIBIT "C"

Date	Initials	Narrative	Units	Rate	Value
05/04/23	SL	Legal Research on Response to CDR Motion to Deny Cert	0.8	\$495.00	\$396.00
05/05/23	SL	Draft reply on MTA	1.7	\$495.00	\$841.50
05/05/23	SL	Draft response MTDC	1.5	\$495.00	\$742.50
05/08/23	SL	Drafting Reply on MTA	6.8	\$495.00	\$3,366.00
05/09/23	BHC	Worked on reply in support of motion for leave to amend [2.9].	2.9	\$495.00	\$1,435.50
05/09/23	SL	Drafting Reply on MTA and Declaration	7.1	\$495.00	\$3,514.50
05/11/23	SL	Drafting Response to MTDC	4.1	\$495.00	\$2,029.50
05/12/23	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
05/12/23	SL	Drafting Response to MTDC	2.6	\$495.00	\$1,287.00
05/14/23	SL	Drafting Response to MTDC	3.8	\$495.00	\$1,881.00
05/15/23	PA	Review supplemental CDR court-ordered discovery responses, compare with existing data and forward comments to co-counsel	0.4	\$550.00	\$220.00
05/15/23	SL	Drafting Response to MTDC	1.2	\$495.00	\$594.00
05/16/23	SL	Drafting Response to MTDC	6.2	\$495.00	\$3,069.00
05/20/23	SL	Drafting Response to MTDC	3.8	\$495.00	\$1,881.00
		Totals	569.6		\$266,503.00

EXHIBIT

D

EXHIBIT "D"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
05/11/20	PA	Draft case memo for co-counsel	0.5	\$550.00	\$275.00	
05/18/20	SL	File Information	0.2	\$495.00	\$99.00	
05/21/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00	
05/27/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00	
05/27/20	SL	Preparing Motion to Vacate	0.2	\$495.00	\$99.00	
06/18/20	PA	Phone call with Sam Leonard to discuss filing strategy	0.2	\$550.00	\$110.00	
07/13/20	SL	Facts - Motion to Vacate	0.2	\$495.00	\$99.00	
07/14/20	PA	Being drafting complaint	0.7	\$550.00	\$385.00	
07/17/20	SL	Motion to Vacate	2.6	\$495.00	\$1,287.00	
07/17/20	SL	Documents regarding failure to serve and facts	0.2	\$495.00	\$99.00	
07/20/20	SL	Researching Hurricane and Service Issues	0.3	\$495.00	\$148.50	
07/20/20	SL	Facts and Documents MTV	0.4	\$495.00	\$198.00	
07/20/20	SL	Facts and Documents MTV	0.2	\$495.00	\$99.00	
07/21/20	SL	Motion to Vacate	0.3	\$495.00	\$148.50	
07/27/20	PA	Complete initial draft of complaint.	1.2	\$550.00	\$660.00	
07/27/20	PA	Drafting counterclaim continued. Complete fact section and class definition	1.8	\$550.00	\$990.00	
07/27/20	SL	MTV and research	2.2	\$495.00	\$1,089.00	
07/27/20	SL	Call with PA regarding Motion to Vacate and CAA violation	0.2	\$495.00	\$99.00	
07/27/20	SL	Facts and Documents MTV	0.4	\$495.00	\$198.00	
07/27/20	SL	Gardiner Motion to Vacate Documents and questions	0.2	\$495.00	\$99.00	
07/27/20	SL	CAA and CPA claims against CDR and claims against Thriv	0.2	\$495.00	\$99.00	
07/28/20	SL	Drafting MTV and emailing with clients regarding facts	1.6	\$495.00	\$792.00	
07/28/20	SL	Facts and Documents MTV	0.5	\$495.00	\$247.50	
07/29/20	SL	Researching Hurricane - MTV	0.4	\$495.00	\$198.00	
07/29/20	SL	MTV	1.2	\$495.00	\$594.00	
07/29/20	SL	Facts and Documents MTV	0.5	\$495.00	\$247.50	
07/30/20	SL	Call regarding researching whereabouts on the day of ser	1.0	\$495.00	\$495.00	
07/31/20	SL	Forwarding Address	0.2	\$495.00	\$99.00	
07/31/20	SL	Emails from The Eden	0.2	\$495.00	\$99.00	
08/04/20	SL	Motion to Vacate	3.2	\$495.00	\$1,584.00	

EXHIBIT "D"

EXHIBIT "D"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
08/04/20	SL	Bank and Phone Records	0.2	\$495.00		\$99.00
08/04/20	SL	Legality of interest and Early Move out Penalty	0.2	\$495.00		\$99.00
08/11/20	PA	Phone call with Blythe Chandler and Sam Leonard re: filing strategy and motion to set aside default	0.3	\$550.00		\$165.00
08/11/20	SL	MTV	1.1	\$495.00		\$544.50
08/13/20	SL	RE: Phone Bill & Bank statement	0.2	\$495.00		\$99.00
08/13/20	SL	Facts and Documents MTV	0.2	\$495.00		\$99.00
08/19/20	SL	MTV	0.4	\$495.00		\$198.00
08/19/20	SL	MTV	1.2	\$495.00		\$594.00
08/19/20	SL	Facts and Documents - RE: Flight Back	0.2	\$495.00		\$99.00
08/19/20	SL	RE: Questions to help with your case	0.2	\$495.00		\$99.00
08/19/20	SL	Emails with Thrive - Moveout Charges	0.2	\$495.00		\$99.00
08/21/20	SL	MTV	0.8	\$495.00		\$396.00
08/22/20	SL	MTV	1.4	\$495.00		\$693.00
08/26/20	SL	MTV & Gardiner Declaration	8.2	\$495.00		\$4,059.00
08/26/20	SL	Status	0.2	\$495.00		\$99.00
08/26/20	SL	Facts and Documents - One other question.	0.2	\$495.00		\$99.00
08/26/20	SL	RE: One other question.	0.2	\$495.00		\$99.00
08/26/20	SL	Draft CDR v. Gardiner - Motion to Vacate	0.2	\$495.00		\$99.00
08/26/20	SL	Declarations	0.2	\$495.00		\$99.00
08/27/20	PA	Review and revise Motion to Set Aside Default	2.3	\$550.00		\$1,265.00
08/27/20	SL	MTV & Gardiner and Pierce Declarations	2.3	\$495.00		\$1,138.50
08/27/20	SL	RE: CDR v. Gardiner - Motion to Vacate	0.2	\$495.00		\$99.00
08/27/20	SL	MTV Editing	0.2	\$495.00		\$99.00
08/27/20	SL	Gardiner Declaration	0.2	\$495.00		\$99.00
08/27/20	SL	More Questions	0.2	\$495.00		\$99.00
08/28/20	SL	Call with Jordan regarding declaration	0.6	\$495.00		\$297.00
08/28/20	SL	Draft Facts	0.2	\$495.00		\$99.00
08/30/20	PA	Extensive revisions to Motion to Set Aside Default, including research and document review.	6.2	\$550.00		\$3,410.00

EXHIBIT "D"

EXHIBIT "D"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
08/31/20	SL	Declaration of Leonard, Proposed Order, Motion for Ord	1.3	\$495.00		\$643.50
08/31/20	SL	MTV and CAA violations	0.2	\$495.00		\$99.00
08/31/20	SL	MTV and CAA violations	0.2	\$495.00		\$99.00
08/31/20	SL	CDR v. Jordan Pierce and Donte Gardiner - Notice of App	0.2	\$495.00		\$99.00
08/31/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00		\$99.00
08/31/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00		\$99.00
08/31/20	SL	CDR v. Pierce and Gardiner - Motion to Vacate	0.2	\$495.00		\$99.00
09/09/20	SL	Status Update	0.2	\$495.00		\$99.00
09/10/20	PA	Research collateral estoppel and res judicata re: default judgments and send brief memo to Sam Leonard and Blythe Chandler re: plan of action	1.0	\$550.00		\$550.00
09/10/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00		\$99.00
09/14/20	SL	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of	0.2	\$495.00		\$99.00
09/14/20	SL	Request for Hearing - Columbia Debt Recovery v. Pierce e	0.2	\$495.00		\$99.00
09/18/20	SL	Hearing on MTV Status	0.1	\$495.00		\$49.50
09/21/20	SL	MTV Hearing	0.1	\$495.00		\$49.50
09/22/20	BHC	New matter and conflict check; drafted representation agreement [4].	0.2	\$495.00		\$99.00
09/22/20	SL	Drafting/Reviewing CorrespondenReviewing order regarding ex-parte filing from the court	0.2	\$495.00		\$99.00
09/22/20	SL	Emailing with Co-Counsel RE: order regarding ex-parte filing	0.2	\$495.00		\$99.00
09/22/20	SL	Email with Court Hearing schedule - Ex parte Order	0.2	\$495.00		\$99.00
09/22/20	SL	Emailing with Co-Counsel RE: Gardiner v. CDR/Thrive	0.2	\$495.00		\$99.00
09/28/20	SL	Reviewing Opposing Party PleadinResponse to Motion to Vacate	0.5	\$495.00		\$247.50
09/28/20	SL	Reply to Response to Motion to Vacate	1.2	\$495.00		\$594.00
09/28/20	SL	MTV - Moveout emails with Thrive	0.2	\$495.00		\$99.00
09/28/20	SL	CDR's Response to MTV	0.2	\$495.00		\$99.00

EXHIBIT "D"

EXHIBIT "D"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
09/28/20	SL	CDR's Response to MTV	0.2	\$495.00	\$99.00	
09/29/20	SL	Reply	6.8	\$495.00	\$3,366.00	
09/30/20	PA	Review and make further revisions to reply memo in support of motion to vacate judgment	0.1	\$550.00	\$55.00	
09/30/20	PA	Phone call with Sam Leonard re: further revisions to reply memo in support of motion to vacate judgment	0.1	\$550.00	\$55.00	
09/30/20	PA	Review and revise Sam Leonard draft of reply memorandum.	2.0	\$550.00	\$1,100.00	
09/30/20	SL	Editing Reply	1.0	\$495.00	\$495.00	
09/30/20	SL	Supp. Decl. of Gardiner and Pierce	1.0	\$495.00	\$495.00	
09/30/20	SL	Reply edits	0.2	\$495.00	\$99.00	
09/30/20	SL	Reply	0.1	\$495.00	\$49.50	
10/01/20	PA	Email to Sam Leonard and Blythe Chandler re: following up on motion to vacate	0.1	\$550.00	\$55.00	
10/01/20	SL	MTV Hearing	2.1	\$495.00	\$1,039.50	
10/01/20	SL	Motion to Set Aside Default	0.7	\$495.00	\$346.50	
10/01/20	SL	Reply does not appear in the docket	0.2	\$495.00	\$99.00	
10/01/20	SL	Hearing Over No Decision Yet	0.1	\$495.00	\$49.50	
10/01/20	SL	Hearing	0.2	\$495.00	\$99.00	
10/01/20	SL	Hearing	0.2	\$495.00	\$99.00	\$10,180.50
11/02/20	SL	MTV - Order Granting	0.3	\$495.00	\$148.50	
11/02/20	SL	MTV Granted	0.2	\$495.00	\$99.00	
11/02/20	SL	MTV Granted	0.2	\$495.00	\$99.00	\$346.50
		Totals	73.0		\$37,042.50	\$37,042.50

EXHIBIT

E

EXHIBIT "E"

Date	Initials	Narrative	Units	Rate	Value
11/02/20	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
11/02/20	PA	Phone call with Sam Leonard re: adding FDCPA claim	0.1	\$550.00	\$55.00
11/02/20	PA	Email to Blythe Chandler re: adding FDCPA claim	0.1	\$550.00	\$55.00
11/02/20	SL	Editing Counterclaims	1.0	\$495.00	\$495.00
11/03/20	BHC	Reviewed final filed complaint [3].	0.1	\$495.00	\$49.50
11/03/20	BKK	Reviewed, revised and finalized petition to remove to superior court [2].	0.1	\$125.00	\$12.50
11/06/20	EBN	Worked on petition for removal and exhibits to same.	1.0	\$200.00	\$200.00
11/19/20	BG	Reviewed affidavit and notice of appearance [0.2]; reviewed rules related to affidavit of prejudice [0.3].	0.2	\$325.00	\$65.00
11/19/20	BHC	Reviewed notices of appearance and request for change of judge [2].	0.1	\$495.00	\$49.50
11/20/20	BHC	Worked on motion to disqualify judge; research regarding same [3].	0.1	\$495.00	\$49.50
11/20/20	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
		Total	4.1		\$1,193.50

EXHIBIT "E"

EXHIBIT

F

EXHIBIT "F"

Date	Initials	Narrative	Units	Rate	Value
06/02/21	PA	Phone call with Sam Leonard re case status and possible amended pleadings	0.8	\$550.00	\$440.00
06/02/21	PA	Phone call with Blythe Chandler and Sam Leonard re: counterclaimant depositions and amending the answer	0.9	\$550.00	\$495.00
06/02/21	SL	Call with Co-counsel RE Discovery, depositions and amendment.	1.0	\$495.00	\$495.00
06/10/21	SS	Researched futlity standard for motions to amend [1]; edited motion to amend [.6].	0.8	\$325.00	\$260.00
06/10/21	SS	Reviewed Answer and Counterclaim Defendants' Answers [.6]; motion to amend [1.4].	1.0	\$325.00	\$325.00
06/11/21	HMR	Worked on declaration of Blythe H. Chandler in support of motion for leave to amend answer.	0.1	\$125.00	\$12.50
06/11/21	SS	Research on futlity standard for motion to amend [.5]; motion to amend drafting [.5].	0.5	\$325.00	\$162.50
06/14/21	BHC	Worked on case schedule issues [.2]. Worked on motion for leave to amend answer and counterclaims [.2].	0.2	\$495.00	\$99.00
06/14/21	SS	Incorporated edits into motion to amend.	0.2	\$325.00	\$65.00
06/17/21	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
07/01/21	SL	Emailing with co-counsel regarding MTA	0.2	\$495.00	\$99.00
07/02/21	PA	Review emails from Brad Fisher regarding amended complaint and exchange multiple emails with co-counsel re: how to respond.	0.1	\$550.00	\$55.00

EXHIBIT "F"

EXHIBIT "F"

Date	Initials	Narrative	Units	Rate	Value
07/02/21	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
Totals			7.1		\$2,930.50

EXHIBIT

G

EXHIBIT "G"

Date	Initials	Narrative	Units	Rate	Value
01/03/23	SL	Call RE Move to Amend	0.2	\$495.00	\$99.00
01/03/23	SL	Drafting Motion to amend	0.5	\$495.00	\$247.50
01/04/23	SL	Drafting Motion to amend	0.8	\$495.00	\$371.25
01/06/23	SL	Editing Motion to Amend, Amended Counterclaims	0.9	\$495.00	\$445.50
01/10/23	PA	Review and respond to email from Brad Fisher re: proposed amended class counterclaim.	0.3	\$550.00	\$165.00
01/10/23	PA	Email co-counsel re: filing motion for leave to amend and discovery	0.1	\$550.00	\$28.00
01/10/23	PA	Email to Brad fisher re: stipulating to filing of 3rd Amended Counterclaim	0.1	\$550.00	\$55.00
01/23/23	SL	Drafting Reply ISO Motion to Amend	1.6	\$495.00	\$792.00
		Totals	4.4		\$2,203.25

EXHIBIT "G"

EXHIBIT

H

EXHIBIT "H"

Date	Initials	Narrative	Units	Rate	Value
04/13/23	PA	Review and respond to email from potential plaintiff v. CDR	0.2	\$550.00	\$110.00
04/14/23	PA	Review and respond to emails from potential plaintiff	0.2	\$550.00	\$110.00
04/14/23	PA	Phone call with potential plaintiff	0.3	\$550.00	\$165.00
		Continued drafting of motion to amend, including analysis of Gustov Cortez facts.			
04/15/23	PA		2.0	\$550.00	\$1,100.00
04/15/23	PA	Begin drafting motion for leave to amend.	0.5	\$550.00	\$275.00
04/16/23	PA	Complete drafting of 5th Amended Counterclaim	1.2	\$550.00	\$660.00
		Worked on motion for leave to amend [1.9]; sent same to co-counsel [1].			
04/17/23	BHC		2.0	\$495.00	\$990.00
04/17/23	PA	Review for new class plaintiffs	0.6	\$550.00	\$330.00
		Review edits to motion for leave to amend made by Blythe Chandler and Sharon Grace and begin revising the motion.	1.8	\$550.00	\$990.00
04/18/23	PA	Revise motion for leave to file amended complaint	1.7	\$550.00	\$935.00
04/18/23	PA	Further revisions to motion for leave to amend	0.4	\$550.00	\$220.00
04/18/23	PA	Email to co-counsel re: motion for leave to amend	0.1	\$550.00	\$55.00
		Revise complaint to make it consistent with motion for leave to amend			
04/18/23	PA		0.4	\$550.00	\$220.00
		Call with co-counsel RE Responding to Motions to Deny Cert			
04/18/23	SL		0.3	\$495.00	\$148.50
		Emails and telephone calls with co-counsel regarding motion for leave to amend complaint [4]; multiple emails with co-counsel regarding finishing motion for leave to amend [4].			
04/19/23	BHC		0.8	\$495.00	\$396.00
04/19/23	SL	Editing Motion to Amend	2.9	\$495.00	\$1,435.50
		Worked on motion for leave to amend [7]. Worked on Fifth Amended Complaint [7]. Further work on motion for leave to amend [7].			
04/20/23	BHC		2.1	\$495.00	\$1,039.50

EXHIBIT "H"

Date	Initials	Narrative	Units	Rate	Value
04/20/23	PA	Review and revise motion for leave to file amended complaint and supporting declaration.	1.6	\$550.00	\$880.00
04/20/23	SL	Drafting Motion to Amend	1.0	\$495.00	\$495.00
04/24/23	PA	Email co-counsel about potential call rep who is paid in full	0.1	\$550.00	\$55.00
04/26/23	HB	Prepared a re-notice of hearing for motion for leave to amend [.4].	0.4	\$150.00	\$60.00
05/05/23	SL	Draft reply on MTA	1.7	\$495.00	\$841.50
05/08/23	SL	Drafting Reply on MTA	6.8	\$495.00	\$3,366.00
05/09/23	BHC	Worked on reply in support of motion for leave to amend [2.9].	2.9	\$495.00	\$1,435.50
05/09/23	SL	Drafting Reply on MTA and Declaration	7.1	\$495.00	\$3,514.50
05/22/23	BHC	Worked with staff to finalize and file Amended Answer and Fifth Amended Counterclaims [.3].	0.3	\$495.00	\$148.50
		Totals	39.4		\$19,975.50

EXHIBIT

I

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
09/16/21	HMR	Worked on plaintiffs' motion for class certification, declaration of Blythe H. Chandler, proposed order granting same [1.5]; worked on stipulated motion to amend case schedule and proposed order [1.3].	0.4	\$125.00	\$50.00	
10/11/21	AMS	Strategy conference about class certification, worked on motion [7.3].	3.6	\$550.00	\$1,980.00	
10/12/21	AMS	Worked on class certification motion, strategy conferences [9.8].	4.9	\$550.00	\$2,695.00	
10/12/21	BHC	Worked on motion for class certification.	2.0	\$495.00	\$990.00	
10/12/21	BHC	Drafted stipulated motion for overlength brief [1.5]; sent same to all counsel [1.2]; submitted agreed stipulation and proposed order to Court	0.4	\$495.00	\$198.00	
10/12/21	PA	Phone call with co-counsel re: class certification issues	0.5	\$550.00	\$248.00	
10/13/21	AMS	Worked on class certification motion and supporting declarations [8.8].	4.4	\$550.00	\$2,420.00	
10/13/21	BHC	Worked on Plaintiffs' motion for class certification [5.4].	2.7	\$495.00	\$1,336.50	
10/14/21	AMS	Worked on class certification motion and supporting documents [7.2].	3.6	\$550.00	\$1,980.00	
10/14/21	BHC	Drafted proposed order granting motion for class certification [1.6]. Email to all counsel regarding confidential materials to be used in support of class certification [1.4].	0.5	\$495.00	\$247.50	
10/14/21	HB	Worked on declaration and exhibits in support of motion for class certification [8.2].	4.1	\$150.00	\$615.00	
10/14/21	PA	Review and edit class cert brief, including emailing preliminary comments to co-counsel	0.3	\$550.00	\$165.00	

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
10/14/21	PA	Make edits and corrections to class cert. brief and email to co-counsel	0.3	\$550.00	\$138.00	
10/14/21	SL	Drafting Declarations	2.1	\$495.00	\$1,039.50	
10/14/21	SL	Call with client regarding declarations	0.3	\$495.00	\$148.50	
10/15/21	AMS	Worked on class certification motion and supporting documents [7.6].	3.8	\$550.00	\$2,090.00	
10/15/21	BHC	Telephone conference with Mr. Fisher regarding confidentiality designations [1].	0.1	\$495.00	\$49.50	
10/15/21	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	
10/15/21	SL	Editing motion for cert. 9, review and editing declarations .3	0.9	\$495.00	\$445.50	
10/18/21	HB	Prepared sealed documents for delivery to the Judge's Mailroom [7].	0.3	\$150.00	\$45.00	
10/22/21	SS	Reviewed responses to motion to seal and related documents [1]; reviewed proposed discovery requests [2].	0.6	\$325.00	\$195.00	
10/25/21	SS	Reply to Columbia Debt Recovery motion to seal exhibits ISO motion for class certification.	2.0	\$325.00	\$650.00	
10/25/21	SS	Reviewed and analyzed responses to motion to seal [1]; researched case-law on motions to seal [1].	1.0	\$325.00	\$325.00	
10/26/21	BHC	Worked on replies in support of motions to seal or file in open court.	0.3	\$495.00	\$148.50	
10/26/21	SS	Proofread replies.	0.3	\$325.00	\$97.50	
11/12/21	SS	Reviewed responses to class certification motion.	1.0	\$325.00	\$325.00	

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
11/15/21	SS	Outlined potential evidentiary and legal arguments for reply to CDR response to class cert motion.	1.0	\$325.00	\$325.00	
11/16/21	SS	Email summarizing potential arguments for replies ISO motion for class certification.	0.5	\$325.00	\$162.50	
11/17/21	SS	Reviewed CDR response brief [1.5]; outlined reply to CDR [1.7].	2.3	\$325.00	\$747.50	
11/18/21	SS	Research for reply to CDR response to class certification [2.1]; outlined [2.1]; outlined reply [5].	2.6	\$325.00	\$845.00	
11/18/21	SS	Outlined reply to CDR response to motion for class certification [7]; commenced drafting reply [4].	1.1	\$325.00	\$357.50	
11/18/21	SS	Reply to CDR response to class certification.	0.5	\$325.00	\$162.50	
11/18/21	SS	Reply to CDR opposition to class certification.	0.8	\$325.00	\$260.00	
11/19/21	SS	Reply to CDR opposition to motion for class certification.	1.7	\$325.00	\$552.50	
11/22/21	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	
11/22/21	SS	CDR reply brief.	1.5	\$325.00	\$487.50	
11/22/21	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	
11/23/21	SS	CDR reply brief in support of class certification [4.3].	4.3	\$325.00	\$1,397.50	
11/24/21	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	

Date	Initials	Narrative	Units	Rate	Value	Subtotal
11/24/21	PA	Zoom call with co-counsel re: strategy for class cert. motion reply briefs	0.5	\$550.00	\$248.00	
11/24/21	SS	Reply to CDR opposition to class certification.	1.5	\$325.00	\$487.50	
11/24/21	SS	Video conference with co-counsel on class cert reply strategy.	0.4	\$325.00	\$130.00	
11/29/21	BHC	Worked on reply in support of certification on CDR classes [1.3].	1.3	\$495.00	\$643.50	
11/29/21	BHC	Telephone conference with co-counsel regarding legal research related to reply briefs [2].	0.2	\$495.00	\$99.00	
11/29/21	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	
11/29/21	SS	Reviewed and incorporated edits to CDR reply.	1.4	\$325.00	\$455.00	
11/30/21	EAA	Completed research regarding for reply briefs in support of class certification [1.8]; email correspondence regarding same [0.2].	2.0	\$425.00	\$850.00	
11/30/21	SS	Edits to CDR reply.	0.7	\$325.00	\$227.50	
11/30/21	SS	CDR reply brief.	1.8	\$325.00	\$585.00	
11/30/21	SS	CDR reply brief.	0.7	\$325.00	\$227.50	
12/01/21	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	
12/01/21	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	
12/01/21	SS	CDR reply brief.	1.0	\$325.00	\$325.00	
12/02/21	AMS	Worked on class certification replies, strategy conference, drafted revised proposed order [5.8].	1.9	\$550.00	\$1,045.00	

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
12/02/21	HB	Worked on declaration and exhibits in support of class cert reply [2.0].	0.7	\$150.00		\$105.00
12/02/21	PA	Review and revise reply memo re: CDR opposition to class	0.7	\$550.00		\$385.00
12/03/21	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
12/03/21	HB	Worked on finalizing declaration, exhibits, and other supporting documents for class cert reply [4].	0.1	\$150.00		\$15.00
12/03/21	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
12/03/21	SL	Reviewing and editing briefs.	0.4	\$495.00		\$198.00
12/17/21	BHC	Exchanged emails with all counsel regarding hearing date for motion for class certification [4].	0.2	\$495.00		\$99.00
01/03/22	BHC	Email to Judge Galvan's chambers requesting date for class certification hearing [2].	0.1	\$495.00		\$49.50
01/14/22	BHC	Reviewed order on change of judge and exchanged emails with co-counsel regarding same [2].	0.1	\$495.00		\$49.50

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
01/21/22	BHC	Worked with staff and co-counsel on production of working copies for Judge McCoy [.6].	0.2	\$495.00	\$99.00	
01/21/22	ET	Created binders of working copies for judge, and arranged for delivery to court on Monday [3.5]	1.2	\$125.00	\$150.00	
02/02/22	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	
02/02/22	BHC	Exchanged emails with Ms. Terrell regarding scheduling oral argument on class certification [2].	0.1	\$495.00	\$49.50	
02/02/22	BHC	Discussed class certification argument scheduling with Ms. Terrell [2].	0.1	\$495.00	\$49.50	
02/21/22	BET	Telephone conference with Ms. Chandler regarding class certification argument outline [5].	0.5	\$550.00	\$275.00	
02/21/22	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	
02/22/22	AMS	Class certification hearing prep [1.4].	0.4	\$550.00	\$220.00	
02/22/22	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	
02/22/22	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	
02/22/22	HB	Gathered documents for class certification preparation [2].	0.1	\$150.00	\$15.00	

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
02/23/22	BET	Prepared for argument on motion for class certification [4.8]	2.4	\$550.00	\$1,320.00	
02/23/22	SS	Case summaries for oral argument prep.	1.1	\$325.00	\$357.50	
02/24/22	BET	Prepared for argument on motion for class certification [6.6]	3.3	\$550.00	\$1,815.00	
02/25/22	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	
02/25/22	SL	Hearing - Motion for Certification	0.5	\$495.00	\$247.50	
02/25/22	SL	Call RE Motion for Certification Hearing	1.5	\$495.00	\$742.50	
02/28/22	BHC	Checked docketing for appeal deadlines related to denial of class certification [3].	0.1	\$495.00	\$49.50	
03/01/22	BHC	Read class certification hearing transcript; discussed same with co-counsel [9].	0.4	\$495.00	\$198.00	
03/01/22	SS	Reviewed and analyzed transcript of class certification hearing.	0.4	\$325.00	\$130.00	
03/02/22	BHC	Video conference with co-counsel to discuss strategy in light of class certification ruling [6].	0.3	\$495.00	\$148.50	
03/02/22	PA	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	0.5	\$550.00	\$275.00	
03/02/22	PA	Conference call with co-counsel re: responding to trial court's denial of motion for class certification	0.5	\$550.00	\$275.00	
03/28/22	PA	Review and respond to email from Blythe Chandler re: appeal and settlement.	0.1	\$550.00	\$28.00	

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
03/28/22	PA	Review and respond to email from Sam Leonard re: settlement offer and appeal.	0.1	\$550.00	\$28.00	
04/08/22	BHC	Worked with staff on filing notice of request for discretionary review [4].	0.2	\$495.00	\$99.00	
04/14/22	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	
04/18/22	AMS	Worked on motion for discretionary review, related research, strategy conference [7.6].	2.5	\$550.00	\$1,375.00	
04/19/22	AMS	Worked on motion for discretionary review, related research [4.7].	1.6	\$550.00	\$880.00	
04/20/22	AMS	Worked on motion for discretionary review, related research [6.4].	2.1	\$550.00	\$1,155.00	
04/22/22	AMS	Worked on motion for discretionary review [7.8].	2.6	\$550.00	\$1,430.00	
04/25/22	AMS	Worked on motion for discretionary review, related research [9.2].	3.0	\$550.00	\$1,650.00	
04/25/22	BHC	Reviewed docket; email to all counsel regarding potential motion to stay				
04/25/22	BHC	case schedule; emails to co-counsel regarding same [3].	0.3	\$495.00	\$148.50	
04/25/22	SS	Drafted introduction, facts section of motion to stay.	1.3	\$325.00	\$422.50	
04/25/22	SS	Researched standard of review for motion to stay pending appeal.	1.2	\$325.00	\$390.00	
04/25/22	SS	Motion to stay pending resolution of motion for discretionary review argument section.	1.3	\$325.00	\$422.50	
04/26/22	AMS	Worked on motion for discretionary review, related research, worked on appendix, related strategy conference [9.2].	3.0	\$550.00	\$1,650.00	

Date	Initials	Narrative	Units	Rate	Value	Subtotal
04/27/22	BHC	Worked on motion for discretionary review [.7]. Worked on motion to stay [5].	0.4	\$495.00	\$198.00	
04/27/22	JN	Worked on clerk's papers for motion for discretionary review.[4]	0.1	\$195.00	\$19.50	
04/27/22	SS	Motion to stay.	0.5	\$325.00	\$162.50	
04/27/22	SS	Declaration in support of motion to stay.	0.3	\$325.00	\$97.50	
04/28/22	AA	Worked on appendix for motion to stay.	0.3	\$125.00	\$37.50	
04/28/22	JN	Worked on motion for discretionary review[2]	0.7	\$195.00	\$136.50	
04/28/22	JN	Continued working on appendix to motion for discretionary review	0.9	\$195.00	\$175.50	
04/28/22	PA	Review and revise motion for discretionary review	0.8	\$550.00	\$413.00	
04/28/22	SL	Editing Motion for Discretionary Review	0.9	\$495.00	\$445.50	
04/29/22	AMS	Finalized motion for discretionary review and appendix [6.6].	2.2	\$550.00	\$1,210.00	
04/29/22	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	
04/29/22	JAL	Worked on appendix index [2.1].	0.7	\$150.00	\$105.00	
05/02/22	BHC	Worked on motion to stay; email to memo to co-counsel regarding same.	0.1	\$495.00	\$49.50	
05/09/22	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	
05/09/22	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	
05/10/22	AAA	Email correspondence regarding reply in support of motion to stay.	0.3	\$425.00	\$127.50	

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
05/10/22	SS	Reviewed sample briefing on individual liability [.6]; reviewed case-law for reply ISO motion to stay [.7].	1.3	\$325.00	\$422.50	
05/11/22	SS	Edited reply ISO motion to stay pending resolution of motion for discretionary review.	1.3	\$325.00	\$422.50	
05/18/22	BHC	Exchanged emails with co-counsel and opposing counsel regarding potential stipulation involving Wojdak [.2].	0.2	\$495.00	\$99.00	
05/27/22	BHC	Exchanged emails with co-counsel and counsel for Wojdak regarding potential stay [.2].	0.2	\$495.00	\$99.00	
06/03/22	BHC	Exchanged emails with Mr. Fisher regarding stipulation to stay [.1].	0.1	\$495.00	\$49.50	
06/06/22	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	
06/06/22	SS	Stipulation re stay of proceedings against William Wojdak pending resolution of motion for discretionary review.	0.5	\$325.00	\$162.50	
06/10/22	AMS	Worked on replies to three oppositions to motion for discretionary review [9.4].	3.1	\$550.00	\$1,705.00	
06/11/22	AMS	Worked on responses to three oppositions to motion for discretionary review [15.2].	5.0	\$550.00	\$2,750.00	
06/12/22	AMS	Worked on discretionary review replies [3.0].	1.0	\$550.00	\$550.00	
06/13/22	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	
06/13/22	SS	Email to B. Fisher re stip.	0.2	\$325.00	\$65.00	

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
06/13/22	SS	Reviewed redlines to stipulation from B. Fisher [1.1]; email re same [1.1]; email re same to opposing counsel [1.1].	0.3	\$325.00	\$97.50	
06/13/22	SS	Created clean copies of stip and proposed order [1.1]; reviewed and approved finals for filing [1.2].	0.3	\$325.00	\$97.50	
06/14/22	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	
06/16/22	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	
06/23/22	BHC	Worked in reply in support of motion for discretionary review [1.5].	0.5	\$495.00	\$247.50	
06/23/22	PA	Review and revise reply memo on motion for discretionary review	0.3	\$550.00	\$165.00	
06/27/22	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	
06/27/22	SS	Reviewed final reply iso motion for discretionary review. Stipulation extending stay pending resolution of mtn for discretionary review.	0.2	\$325.00	\$65.00	
08/19/22	SS	Revised draft stipulation on case schedule [1.2]; discussed same with Ms. Terrell [2].	0.7	\$325.00	\$227.50	
08/22/22	BHC	Accepted revisions to draft stipulation [1.2]; amended proposed order re same [1.2]; email circulating same [1.1]; revised stip and proposed order with new dates [1.1]; email circulating updated stips [1.1].	0.4	\$495.00	\$198.00	
08/22/22	SS		0.7	\$325.00	\$227.50	

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
08/23/22	SS	Email recirculating original stipulation [1.2]; updated stipulation and proposed order re same [1.2].	0.4	\$325.00	\$130.00	
10/19/22	BHC	Video conference with co-counsel regarding case management [1.6].	0.3	\$495.00	\$148.50	
10/19/22	PA	Phone call with Sam Leonard and Blythe Chandler re: denial of discretionary review and strategy going forward.	0.5	\$550.00	\$248.00	
11/03/22	PA	Begin discovery review to prepare for new class certification effort/email questions to co-counsel.	1.0	\$550.00	\$550.00	\$71,518.50
03/28/23	SL	Cert Motion Strategy and Discovery CDR and Thrive	0.5	\$495.00	\$247.50	
04/04/23	SL	Drafting correspondence to opposing counsel regarding cross motions for cert on CDR and sched	0.5	\$495.00	\$247.50	
04/05/23	BHC	Read and analyzed CDR's motion to deny class certification [1].	1.0	\$495.00	\$495.00	
04/05/23	PA	Phone call with Blythe Chandler and Sam Leonard re: discovery strategy and opposition to motion to deny class certification	0.5	\$550.00	\$275.00	
04/05/23	SL	Call with co-counsel RE Cert and CDR Records	0.4	\$495.00	\$198.00	
04/11/23	BHC	Research related to response to CDR's motion to deny class certification [1.5].	1.5	\$495.00	\$742.50	
04/13/23	PA	Review, research and respond to email from Brad Fisher re: word limits and filing deadlines for CDR's motion.	0.2	\$550.00	\$110.00	
04/18/23	BHC	Legal research related to CDR's motion for deny class certification [1.2]; email to all counsel regarding same [1.2].	1.4	\$495.00	\$693.00	

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
04/18/23	PA	Review various emails regarding scheduling of motions to deny class certification and have conference call with co-counsel re: how to respond.	0.6	\$550.00	\$347.00	
04/20/23	PA	Phone call with Sam Leonard to discuss CDR discovery issues and motion to deny class cert.	0.3	\$550.00	\$165.00	
04/21/23	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].	3.0	\$495.00	\$1,485.00	
04/21/23	SL	Drafting Response to CDR Motion to Deny Cert	6.1	\$495.00	\$3,019.50	
04/24/23	PA	Phone call with Sam Leonard re: CDR data and responding to motion to deny class certification	0.2	\$550.00	\$110.00	
04/25/23	BHC	Video conference with co-counsel to discuss responses to motion to deny class certification [6]. Email to staff regarding filing issues [1.1]. 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	
04/25/23	PA	Zoom meeting with Blythe Chandler, Amanda Steiner and Sam				
04/25/23	PA	Leonard to discuss motions to deny class certification	0.3	\$550.00	\$165.00	
05/04/23	SL	Legal Research on Response to CDR Motion to Deny Cert	0.8	\$495.00	\$396.00	
05/05/23	SL	Draft response MTDC	1.5	\$495.00	\$742.50	
05/11/23	SL	Drafting Response to MTDC	4.1	\$495.00	\$2,029.50	
		Worked on response to motion to deny class certification [1.5]; discussed same with Mr. Leonard [2]; email to Mr. Leonard regarding same [1].				
05/12/23	BHC		1.8	\$495.00	\$891.00	

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
05/12/23	SL	Drafting Response to MTDC	2.6	\$495.00	\$1,287.00	
05/14/23	SL	Drafting Response to MTDC	3.8	\$495.00	\$1,881.00	
05/15/23	SL	Drafting Response to MTDC	1.2	\$495.00	\$594.00	
05/16/23	SL	Drafting Response to MTDC	6.2	\$495.00	\$3,069.00	
05/20/23	SL	Drafting Response to MTDC	3.8	\$495.00	\$1,881.00	\$21,764.00
05/22/23	SL	Drafting Response to Motion to Deny Cert	7.8	\$495.00	\$3,861.00	
05/23/23	SL	Response to MTDC	4.7	\$495.00	\$2,326.50	
05/24/23	BHC	Worked on response to CDR's motion to deny	2.2	\$495.00	\$1,089.00	
05/24/23	PA	Review and edit opposition to CDR Motion to Deny Class Certification.	0.6	\$550.00	\$330.00	
05/24/23	PA	Phone call with Sam Leonard re: opposition to CDR Motion to Deny Class Certification.	0.3	\$550.00	\$165.00	
05/24/23	SL	Call with Paul RE CDR brief and Thrive discovery responses related to CDR brief.	0.2	\$495.00	\$74.25	
05/25/23	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 [1.1]. Worked with staff on exhibits to be filed with oppositions to class certification [1.8]. Worked on expert declaration; email to Mr. Dawson regarding same [1.5].	4.2	\$495.00	\$2,079.00	
05/25/23	HB	Worked on exhibits in support of responses to motion to decertify and motion to strike [1.0].	1.0	\$150.00	\$150.00	
05/25/23	PA	Review and edit revised opposition to CDR Motion to Deny Class Certification.	0.4	\$550.00	\$220.00	
05/25/23	SL	SL Declaration ISO Response to CDR MTDC	2.3	\$495.00	\$1,138.50	
05/26/23	BHC	Worked on issues related to exhibits to Leonard declaration supporting opposition to motions to deny class certification [1.6].	0.6	\$495.00	\$297.00	

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
05/26/23	HB	Worked on Declaration and exhibits in support of response to motions to decertify and strike [4.6].	1.5	\$150.00	\$225.00	
05/30/23	BHC	Worked on response to CDR motion to deny certification; reviewed and approved same for filing [1.8].	1.8	\$495.00	\$891.00	
05/30/23	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	
05/30/23	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	
05/30/23	SL	Call with co-counsel regarding Response to motion to deny cert exhibits	0.2	\$495.00	\$74.25	
06/08/23	AMS	Prepared for and participated in moot for hearing on motion to deny class certification [1.5].	0.7	\$550.00	\$385.00	
06/08/23	SL	Hearing prep CDR MTN to Deny Cert	4.6	\$495.00	\$2,277.00	
06/09/23	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	
06/09/23	SL	Hearing prep CDR Motion to Deny Cert	2.1	\$495.00	\$1,039.50	
06/09/23	SL	Hearing CDR Motion to Deny Cert 1.0 Thrive hearing motion to Deny Cert .7	1.0	\$495.00	\$504.90	
06/12/23	BHC	Drafted proposed order denying CDR motion to dismiss [2.5].	2.5	\$495.00	\$1,237.50	

EXHIBIT "I"

EXHIBIT "I"

Date	Initials	Narrative	Units	Rate	Value	Subtotal
06/12/23	PA	Review and edit revisions to proposed findings of fact and conclusions of law for Thrive/Belcorp/CDR Motions to Deny Class Certification	0.3	\$550.00	\$184.00	
06/13/23	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	
06/23/23	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	
		Totals	247.1		\$113,792.90	\$93,282.50

EXHIBIT "I"

EXHIBIT

J

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
11/11/20	PA	Draft written discovery to serve on Columbia Debt Recovery	1.8	\$550.00	\$990.00
11/19/20	BG	Revised discovery requests to CDR [1.6]	1.6	\$325.00	\$520.00
11/23/20	BG	Worked on discovery requests [1.5].	0.7	\$325.00	\$227.50
11/23/20	PA	Review and edit written discovery to CDR. Exchange emails with co counsel re: final changes to written discovery to Thrive and CDR			
11/23/20	PA		0.2	\$550.00	\$111.00
11/24/20	BG	Revised discovery requests to Thrive and CDR [0.9].	0.4	\$325.00	\$130.00
		Approved discovery requests for service; exchanged emails with staff			
01/22/21	BHC	regarding same [.3].	0.1	\$495.00	\$49.50
01/29/21	SL	Meeting with opposing counsel RE discovery	0.4	\$495.00	\$198.00
		Reviewed draft meet and confer letter from co-counsel [0.2]; worked on			
03/02/21	BG	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
03/03/21	BG	Worked on meet and confer letter for CDR [4.0].	4.0	\$325.00	\$1,300.00
03/03/21	BG	Coordinated drafting of protective order [0.2].	0.1	\$325.00	\$32.50
03/04/21	BG	Worked on meet and confer letter for CDR [0.5].	0.5	\$325.00	\$162.50
		Review and revise meet and confer letter to Columbia Debt Recovery			
03/04/21	PA		0.4	\$550.00	\$220.00
		Worked on discovery letters to Thrive and CDR [1.1]; worked on document			
03/05/21	BHC	review [.5].	0.8	\$495.00	\$396.00
		Exchanged emails with co-counsel and all counsel regarding case management and discovery conference [.4].			
03/10/21	BHC		0.2	\$495.00	\$99.00
		Meet and confer phone call with co-counsel and counsel for Columbia Debt Recovery and Thrive Communities			
03/16/21	PA		0.7	\$550.00	\$385.00

EXHIBIT "j"

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
03/16/21	PA	Phone call with Blythe Chandler and Sam Leonard to discuss discovery	0.2	\$550.00	\$83.00
03/16/21	SL	Discovery conference with Thrive and CDR	1.6	\$495.00	\$792.00
03/16/21	SL	Reviewing CDR Discovery Requests and Response Prep	1.0	\$495.00	\$495.00
03/17/21	PA	Further research and drafting of responses to CDR interrogatories to Gardiner			
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.5	\$550.00	\$275.00
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.8	\$550.00	\$440.00
03/17/21	PA	Review CDR discovery to plaintiffs and begin researching response	0.3	\$550.00	\$165.00
03/18/21	PA	Complete researching and drafting responses to CDR document requests to Donte Gardiner/forward to Sam Leonard for initial factual review and investigation	0.8	\$550.00	\$440.00
03/18/21	PA	Begin researching and drafting responses to CDR document requests to Donte Gardiner	0.8	\$550.00	\$440.00
03/23/21	BHC	Finalized stipulated protective agreement and sent to staff for submission to court [.2].	0.1	\$495.00	\$49.50
03/24/21	HMR	Worked on defendants' first set of interrogatories and requests for production of documents to third-party defendant William Wojdak.			
03/24/21	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].	0.3	\$125.00	\$37.50
03/25/21	BHC	Worked with staff on discovery requests to Wojdak; emails to co-counsel regarding same [.1].	1.0	\$125.00	\$125.00
03/25/21	BHC	Worked with staff on discovery requests to Wojdak; emails to co-counsel regarding same [.1].	0.1	\$495.00	\$49.50

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
03/29/21	PA	Review Brad Fisher letter re: CDR discovery positions and email comments and strategy to co-counsel	0.4	\$550.00	\$220.00
03/29/21	SL	Reviewing CDR responses	1.0	\$495.00	\$495.00
03/29/21	SL	Drafting Correspondence to Co Counsel RE CDR Discovery	0.3	\$495.00	\$148.50
03/29/21	TS	Worked on notice of Rule 30(b)(6) deposition to Columbia Debt Recovery.	0.5	\$125.00	\$62.50
03/30/21	PA	Email to co-counsel re: Rule 30(b)(6) notice for CDR and other issues	0.1	\$550.00	\$55.00
03/30/21	PA	Draft Rule 30(b)(6) notice for CDR, adapting notice from Jammeh v. HNN	1.0	\$550.00	\$550.00
03/31/21	SL	Call w client regarding discovery responses	1.1	\$495.00	\$544.50
04/02/21	PA	Review email from Sam Leonard re: draft discovery and make suggested changes/forward to Blythe Chandler	0.1	\$550.00	\$55.00
04/08/21	SL	Email to Thrive and CDR	0.2	\$495.00	\$99.00
04/09/21	BHC	Worked on Rule 30(b)(6) Notice to CDR [.3].	0.3	\$495.00	\$148.50
04/19/21	SL	Emailing with Client RE Discovery	0.2	\$495.00	\$99.00
04/26/21	BHC	Video conference with co-counsel regarding case management [.4]. Telephone conference with co-counsel regarding same [.3].	0.3	\$495.00	\$148.50
04/26/21	SL	Drafting discovery responses	0.3	\$495.00	\$148.50
04/28/21	SL	Drafting discovery responses	2.6	\$495.00	\$1,287.00
04/28/21	SS	Reviewed and analyzed letter from opposing counsel on discovery from CDR.	0.3	\$325.00	\$97.50

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
04/28/21	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
04/28/21	SS	Reviewed cases cited by opposing counsel in discovery letter.	0.9	\$325.00	\$292.50
04/28/21	SS	Commenced research on pre certification discovery requests.	0.4	\$325.00	\$130.00
04/28/21	SS	Drafted email regarding research question and scope of discovery letter;	0.3	\$325.00	\$97.50
04/28/21	SS	Researched issue of pre certification discovery in Washington state courts.	1.0	\$325.00	\$325.00
04/28/21	SS	Commenced drafting letter in response to opposing counsel regarding discovery RFPs No. 3, 4, 5, and 12.	0.4	\$325.00	\$130.00
04/29/21	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
04/29/21	PA	Review and respond to email from Sam Leonard re: discovery issue (bank records)	0.1	\$550.00	\$55.00
04/29/21	SS	Drafted letter to opposing counsel regarding RFPs No. 3, 4, 5, and 12.	0.5	\$325.00	\$162.50
04/29/21	SS	Edited draft letter to opposing counsel on RFPs 3, 4, 5, and 12.	0.3	\$325.00	\$97.50
04/29/21	SS	Drafted email to partner sending draft letter re discovery.	0.2	\$325.00	\$65.00
04/30/21	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

EXHIBIT "j"

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
04/30/21	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
05/03/21	SS	Reviewed CDR's responses to first set of interrogatories and requests for production.	0.5	\$325.00	\$162.50
05/07/21	BHC	Meeting with co-counsel regarding discovery, document review, and case management [.6].	0.3	\$495.00	\$148.50
05/07/21	SS	Edited draft discovery letter to CDR.	0.5	\$325.00	\$162.50
05/07/21	SS	Reviewed draft discovery correspondence and new requests for production to prepare for meeting.	0.6	\$325.00	\$195.00
05/07/21	SS	Video conference regarding draft discovery letters, draft requests for production.	0.5	\$325.00	\$162.50
05/10/21	SS	Reviewed discovery produced by CDR.	0.8	\$325.00	\$260.00
05/11/21	SS	Commenced reviewing disclosures by Columbia Debt Recovery - CollectOne handbook.	0.5	\$325.00	\$162.50
05/18/21	BHC	Video conference with co-counsel regarding client discovery responses and related matters [.7].	0.3	\$495.00	\$148.50
05/19/21	JN	Reviewed email regarding production of client documents and prepared response to same. [.1]	0.1	\$195.00	\$19.50
05/19/21	PA	Review and revise meet and confer letter to CDR	0.2	\$550.00	\$110.00
05/19/21	PA	Zoom meeting with Sam Leonard, Blythe Chandler and Sarah Smith	0.8	\$550.00	\$440.00

EXHIBIT "j"

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
05/19/21	SS	Finalized discovery letter to CDR; emailed same for sending.	0.3	\$325.00	\$97.50
05/19/21	SS	Reviewed suggested edits to discovery letter to CDR.	0.3	\$325.00	\$97.50
05/19/21	SS	Reviewed edits to discovery letter to CDR [.2].	0.2	\$325.00	\$65.00
05/19/21	SS	Edited discovery letter to CDR to include request for communications between it and Thrive.	0.2	\$325.00	\$65.00
05/19/21	SS	Video conference with counsel on case strategy and outstanding discovery.	0.3	\$325.00	\$97.50
05/19/21	TS	Finalized ltr to B. Fisher [.2].	0.2	\$125.00	\$25.00
05/20/21	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
05/20/21	SL	Call with co-counsel re discovery	0.4	\$495.00	\$198.00
05/20/21	SS	Reviewed suggested edits to discovery letter to CDR from co-counsel.	0.5	\$325.00	\$162.50
05/20/21	SS	Finalized edits to discovery letter to CDR.	0.3	\$325.00	\$97.50
05/20/21	SS	Reviewed and finalized discovery letters to Belkorp and CDR.	0.1	\$325.00	\$32.50
05/20/21	TS	Finalized ltr. to B. Fisher [.1].	0.1	\$125.00	\$12.50
05/21/21	PA	Phone call with Donte Gardiner and Sam Leonard	0.2	\$550.00	\$110.00
05/21/21	SL	Call with client regarding discovery	0.4	\$495.00	\$198.00
05/21/21	SL	Call with co-counsel re discovery	0.3	\$495.00	\$148.50
05/24/21	BHC	Exchanged numerous emails with co-counsel regarding discovery matters and scheduled meet and confer [.3].	0.1	\$495.00	\$49.50
05/25/21	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

Date	Initials	Narrative	Units	Rate	Value
		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].			
05/25/21	BHC	Emailing and talking with co-counsel on CDR discovery issues.	1.2	\$495.00	\$594.00
05/25/21	SL	Worked on and finalized letter to Brad Fisher regarding discovery; emailed same to counsel and co-counsel.	0.5	\$495.00	\$247.50
05/26/21	HMR	Review and respond to multiple emails regarding Brad Fisher complaints about our clients' discovery responses. Review Brad Fisher letter and our discovery	0.4	\$125.00	\$50.00
05/26/21	PA	Reviewed discovery letters in preparation for conferences.	0.4	\$550.00	\$220.00
05/26/21	SS	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].	0.3	\$325.00	\$97.50
05/27/21	BET	Reviewed email from Mr. Fisher regarding meet and confer and responses to same.[.1]	1.4	\$550.00	\$770.00
05/27/21	JN	Review Brad Fisher email re: postponing phone call, draft proposed response, and circulate to co-counsel	0.1	\$195.00	\$19.50
05/27/21	PA	Zoom call to meet and confer with Brad Fisher re: CDR discovery issues. No charge b/c my microphone malfunctioned	0.1	\$550.00	\$55.00
05/27/21	PA		0.0	\$550.00	\$0.00

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
05/27/21	PA	Zoom call with Beth Terrell, Sarah Smith and Sam Leonard re: CDR discovery and other issues	0.5	\$550.00	\$275.00
05/27/21	SL	CDR discovery call	1.0	\$495.00	\$495.00
05/27/21	SL	Reviewing client documents	0.8	\$495.00	\$396.00
05/27/21	SS	Prepared for discovery conference with CDR.	0.5	\$325.00	\$162.50
		Discovery conference with Mr. Fisher on Columbia Debt Recovery's discovery responses.			
05/27/21	SS	Video conference with co-counsel to debrief on discovery call with Columbia Debt Recovery.	0.9	\$325.00	\$292.50
05/27/21	SS		0.5	\$325.00	\$162.50
		Reviewed email from Mr. Fisher regarding plaintiffs' depositions and response to same. [1];	0.1	\$195.00	\$19.50
05/28/21	JN	Review and edit confirming letter to Brad Fisher re: CDR discovery			
05/28/21	PA		0.3	\$550.00	\$165.00
05/28/21	SL	Drafting discovery letter and reviewing CDR discovery	0.8	\$495.00	\$396.00
		Email to Mr. Fisher on Columbia Debt Recovery discovery call.			
05/28/21	SS		0.9	\$325.00	\$292.50
		Incorporated suggestions into email to Brad Fisher on discovery call.			
05/28/21	SS		0.4	\$325.00	\$130.00
		Incorporated edits into email to Brad Fisher on discovery call.			
05/28/21	SS		0.2	\$325.00	\$65.00
		Telephone conference with co-counsel regarding client email production			
06/02/21	BHC	[.5].	0.5	\$495.00	\$247.50
		Reviewed letter from OC on discovery conference and disputes.			
06/02/21	SS		0.3	\$325.00	\$97.50
		Discussed client deposition scheduling with co-counsel [.5]. Worked with			
06/03/21	BHC	staff on document production [2].	0.3	\$495.00	\$148.50

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
06/03/21	PA	Review and draft lengthy response to Bard Fisher June 2, 2021 letter re: discovery, including researching	1.2	\$550.00	\$660.00
06/03/21	SS	Reviewed and analyzed letter from opposing counsel following up on discovery call.	0.3	\$325.00	\$97.50
06/04/21	BHC	Reviewed discovery correspondence from Mr. Fisher, email to co-counsel regarding same [.4].	0.4	\$495.00	\$198.00
06/04/21	SL	Emailing with co-counsel and opposing counsel regarding deposition scheduling	0.2	\$495.00	\$99.00
06/07/21	BHC	Worked on primary witness disclosure [.8].	0.4	\$495.00	\$198.00
06/07/21	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
06/07/21	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
06/08/21	BET	Discussed response to Mr. Fisher's letter with Ms. Chandler [.2]	0.2	\$550.00	\$110.00
06/08/21	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
06/08/21	BHC	Worked on Rule 30(b)(6) notice [.8].	0.8	\$495.00	\$396.00
06/08/21	PA	Review and comment on draft letter to Brad Fisher re: discovery	0.1	\$550.00	\$55.00

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
06/09/21	BHC	Worked on letter to Mr. Fisher regarding discovery matters and sent same [1].	1.0	\$495.00	\$495.00
06/09/21	PA	Conference call with Sarah Smith, Beth Terrell, Blythe Chandler and Sam Leonard re: case status, discovery and planning			
06/09/21	SL	Strategy meeting - Discovery and class cert	0.4	\$550.00	\$220.00
06/09/21	SL	Call with client regarding discovery	0.8	\$495.00	\$396.00
06/09/21	SL	Reviewing CDR Discovery Responses	0.4	\$495.00	\$198.00
06/10/21	SL	Editing discovery letter to CDR	0.2	\$495.00	\$99.00
		Responded to Mr. Fisher's request to extend time to provide supplemental class data [2].			
06/16/21	BHC	class data [2].	0.2	\$495.00	\$99.00
06/18/21	BHC	Email to Mr. Fisher regarding client supplement [1].	0.1	\$495.00	\$49.50
06/18/21	SL	Preparing client supplemental responses	1.8	\$495.00	\$891.00
06/22/21	ET	Reviewed production for personal information to redact [0.5]	0.5	\$125.00	\$62.50
		Email to co-counsel regarding supplemental discovery [3]; email to co-			
06/22/21	SS	counsel regarding motion to amend case schedule [2].	0.2	\$325.00	\$65.00
		Email to opposing counsel on proposed dates for case schedule and class			
06/23/21	SS	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
06/24/21	SL	Preparing Gardiner Supplemental Production	0.8	\$495.00	\$396.00
06/24/21	SL	Call with client regarding discovery	0.5	\$495.00	\$247.50
07/26/21	BHC	Email to Mr. Fisher regarding deposition schedule [2].	0.2	\$495.00	\$99.00
		Exchanged emails with co-counsel regarding case strategy and discovery [2].			
08/05/21	BHC		0.1	\$495.00	\$49.50

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
08/05/21	JAL	Worked on drafting deposition notice [1.1]. Email to co-counsel regarding client deposition dates [1]. Exchanged emails with co-counsel regarding statute of limitations matters [1].	1.1	\$150.00	\$165.00
08/06/21	BHC	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].	0.2	\$495.00	\$99.00
08/10/21	SS	Worked on amended Rule 30(b)(6) notice to CDR for service [1].	1.2	\$325.00	\$390.00
08/11/21	BHC	Exchanged emails with co-counsel regarding client deposition scheduling [2].	0.1	\$495.00	\$49.50
08/11/21	BHC	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	0.2	\$495.00	\$99.00
08/11/21	SS	Revised Rule 30(b)(6) notice and approved same for service [2].	1.1	\$325.00	\$357.50
08/12/21	BHC	Reviewed Columbia Debt Recovery's objections to 30(b)(6) deposition notice topics [2].	0.2	\$495.00	\$99.00
08/20/21	SS	Exchanged emails with Mr. Fisher regarding remote deposition exhibit protocol [2].	0.2	\$325.00	\$65.00
08/27/21	BHC		0.2	\$495.00	\$99.00

Date	Initials	Narrative	Units	Rate	Value
08/27/21	JN	Reviewed emails from Mr. Fisher regarding presentation of exhibits and prepared emails regarding same. [1.1]. Created case and depositions in Agile. [2]. Prepared email to all counsel enclosing instructions for testing of Agile platform. [1.1]	0.4	\$195.00	\$78.00
08/31/21	SL	Gardner Deposition Prep	1.6	\$495.00	\$792.00
08/31/21	SL	Dep prep	1.5	\$495.00	\$742.50
09/01/21	SL	Reviewing production from CDR	1.0	\$495.00	\$495.00
		Followed entire deposition of Jordan Pierce but am only billing an hour for my comments and assistance to Sam Leonard.			
09/02/21	PA		1.0	\$550.00	\$550.00
09/02/21	SL	Jordan Pierce Deposition	5.0	\$495.00	\$2,475.00
09/02/21	SL	Jordan Pierce Deposition Prep	1.2	\$495.00	\$594.00
09/02/21	SL	Deposition Prep	1.1	\$495.00	\$544.50
09/03/21	SL	Dep. Donte Gardner	4.2	\$495.00	\$2,079.00
09/05/21	BHC	Worked on CDR Rule 30(b)(6) outline.	5.9	\$495.00	\$2,920.50
		Review CDR deposition outline and email comments to co-counsel			
09/06/21	PA		0.2	\$550.00	\$110.00
		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 [1.1]; reviewed exhibits in preparation for deposition [2]. Worked on deposition preparation [1.5].			
09/07/21	BHC		2.1	\$495.00	\$1,039.50
09/07/21	JJB	Worked on deposition preparation.	1.7	\$175.00	\$297.50
09/07/21	SL	Editing and drafting CDR Dep Questions.	1.6	\$495.00	\$792.00
		Reviewing letter from Brad Fisher and drafting proposed response.			
09/07/21	SL		0.3	\$495.00	\$148.50

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
09/08/21	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
09/08/21	JJB	Telephone conferences regarding deposition exhibits; prepared deposition exhibits.	0.5	\$175.00	\$87.50
09/08/21	SL	CDR Dep.	5.5	\$495.00	\$2,722.50
09/08/21	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].	3.0	\$325.00	\$975.00
09/09/21	SS	Video conference with co-counsel following 30(b)(6) deposition [6].	0.6	\$325.00	\$195.00
09/17/21	BHC	Worked on subpoena to Saint Newton [.2].	0.2	\$495.00	\$99.00
09/17/21	JAL	Worked on drafting deposition subpoena [1.6].	1.6	\$150.00	\$240.00
09/20/21	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
09/20/21	JAL	Worked on drafting and serving subpoena [1.9].	1.9	\$150.00	\$285.00
09/21/21	JAL	Worked on loading production [0.9].	0.9	\$150.00	\$135.00
10/04/21	SS	Reviewed letter from counsel for Saint Newton [.1].	0.1	\$325.00	\$32.50
10/11/21	SL	Reviewing transcript of Gardiner Dep	1.3	\$495.00	\$643.50
12/21/22	SL	Emailing with co-counsel RE Status of discovery	0.1	\$495.00	\$49.50
12/28/22	SL	Editing TAC	1.0	\$495.00	\$470.25
01/03/23	SL	Drafting email to PA regarding motion to compel and law section of brief.	0.3	\$495.00	\$123.75
01/30/23	PA	Review and organize prior discovery responses from CDR.	0.7	\$550.00	\$385.00
01/30/23	PA	Zoom call re: CDR discovery with co-counsel	0.3	\$550.00	\$165.00

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
01/31/23	PA	Email to Brad Fisher re: prior CDR discovery objections	0.5	\$550.00	\$275.00
01/31/23	PA	Review and organize prior CDR discovery responses	1.0	\$550.00	\$550.00
02/01/23	PA	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.	2.1	\$550.00	\$1,155.00
02/03/23	PA	Draft second set of discovery requests for CDR, including reviewing prior discovery responses in this case and Jammeh v. HNN.	1.4	\$550.00	\$770.00
02/05/23	PA	Review discovery and complaint and start draft of discovery to do list	1.0	\$550.00	\$550.00
02/06/23	PA	Begin drafting motion to compel CDR to produce documents	0.9	\$550.00	\$495.00
02/06/23	PA	Review some of the prior discovery and email to co-counsel re: discovery issues	0.4	\$550.00	\$220.00
02/07/23	BHC	Video conference with co-counsel regarding discovery matters [3].	0.1	\$495.00	\$49.50
02/07/23	PA	Continued drafting of motion to compel CDR to produce	1.4	\$550.00	\$770.00
02/07/23	PA	Zoom call re: discovery and other issues with Sam Leonard and Blythe Chandler	0.3	\$550.00	\$165.00
02/07/23	SL	Emails RE CDR	0.3	\$495.00	\$148.50
02/08/23	PA	Further drafting of motion to compel v. CDR, including emails with co-counsel	0.8	\$550.00	\$440.00
02/09/23	PA	Complete initial researching and draft of Motion to Compel CDR	3.0	\$550.00	\$1,650.00
02/14/23	PA	Phone call with Sam Leonard re: discovery phone call and new discovery to CDR and Thrive	0.1	\$550.00	\$55.00

Date	Initials	Narrative	Units	Rate	Value
02/14/23	PA	Meet and confer phone call with CDR (Jeff Hasson, Brad Fisher)	0.4	\$550.00	\$220.00
02/14/23	SL	Meet and Confer with BF and JH RE CDR discovery responses	0.5	\$495.00	\$247.50
02/17/23	PA	Review and annotate email from Brad Fisher re: document production/forward to Sam Leonard	0.4	\$550.00	\$220.00
02/17/23	PA	Review and incorporate Sam Leonard revisions, select and organize exhibits and draft supporting declaration consistent with the final version of the motion.	2.3	\$550.00	\$1,265.00
02/20/23	PA	Draft response to Brad Fisher letter about discovery responses.	1.1	\$550.00	\$605.00
02/24/23	PA	Emails to counsel for Thrive and CDR re: filing a response	0.1	\$550.00	\$55.00
02/27/23	PA	Review and edit final version of discovery letter to Brad Fisher and Jeffery Hasson	0.2	\$550.00	\$110.00
02/27/23	PA	Phone call with Sam Leonard re: CDR discovery issues	0.1	\$550.00	\$55.00
02/27/23	PA	Review and edit meet and confer letter to CDR	0.3	\$550.00	\$165.00
02/27/23	SL	Reviewing Discovery and Drafting Letter to CDR RE Discovery	1.8	\$495.00	\$891.00
02/28/23	PA	Review and respond to email from Jeff Hasson re: resolving outstanding discovery disputes.	0.2	\$550.00	\$110.00
03/03/23	PA	Draft email confirming meet and confer phone call and including other discovery issues	0.7	\$550.00	\$385.00
03/06/23	PA	Review and respond to email from Blythe Chandler re: discovery order and very preliminary data results.	0.2	\$550.00	\$110.00
03/07/23	PA	Email to Jeff Hasson re: CDR discovery	0.1	\$550.00	\$55.00

EXHIBIT "J"

Date	Initials	Narrative	Units	Rate	Value
03/10/23	PA	Quick review of CDR discovery responses and spreadsheet and review and respond to email from Sam Leonard regarding this discovery	0.3	\$550.00	\$165.00
03/10/23	SL	Reviewing CDR Discovery Responses	1.0	\$495.00	\$495.00
03/13/23	PA	Review discovery responses and email opposing counsel to meet and confer	0.2	\$550.00	\$110.00
03/14/23	PA	Email to Blythe Chandler and Beth Terrell re: discovery status.	0.2	\$550.00	\$110.00
03/14/23	PA	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.	0.4	\$550.00	\$220.00
03/14/23	PA	Research and begin revised draft of motion to compel v. CDR	1.2	\$550.00	\$660.00
03/14/23	PA	Review data compilation and respond to email from Jeff Hasson re: scheduling meet and confer phone call.	0.3	\$550.00	\$165.00
03/15/23	JR	Met and conferred with CDR regarding discovery requests [.4]; drafted and revised summary of meet and confer to send to CDR [.6].	1.0	\$275.00	\$275.00
03/15/23	PA	Review discovery and draft notes in preparation for meet and confer phone call	0.5	\$550.00	\$275.00
03/15/23	PA	Draft confirming letter re: meet and confer with Jeff Hasson, and send to Jasmin Rezale for review and editing	0.5	\$550.00	\$275.00
03/15/23	PA	Meet and confer phone call with Jeff Hasson and Jasmin Rezale	0.4	\$550.00	\$220.00
03/16/23	PA	Draft motion to compel CDR	2.9	\$550.00	\$1,595.00

EXHIBIT "J"

Date	Initials	Narrative	Units	Rate	Value
03/19/23	PA	Complete initial draft of Motion to Compel v Columbia Debt Recovery/select and organize exhibits.	3.2	\$550.00	\$1,760.00
03/19/23	PA	Review Jeff Hasson email regarding CDR's practices, review deposition transcript and other evidence and send response	0.8	\$550.00	\$440.00
03/20/23	BHC	Video conference with co-counsel regarding case management and discovery progress [.5].	0.2	\$495.00	\$99.00
03/20/23	PA	Conference call with Blythe Chandler and Jasmin Resale re: case status	0.5	\$550.00	\$275.00
03/21/23	BHC	Worked on motion to compel CDR documents and data [1].	1.0	\$495.00	\$495.00
03/21/23	PA	Draft Declaration of Paul Arons in Support of Motion to Compel CDR Discovery	0.8	\$550.00	\$440.00
03/22/23	BHC	Reviewed and approved motion to compel CDR production and related documents for filing [.4].	0.4	\$495.00	\$198.00
03/22/23	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
03/28/23	BHC	Video conference with co-counsel regarding discovery management [1].	0.3	\$495.00	\$148.50
03/29/23	PA	Review CDR opposition to motion to compel discovery, research and being drafting reply brief	1.0	\$550.00	\$550.00
03/29/23	SL	Reviewing response to MTC and discovery in Jammeh for information on CDR's practices	1.1	\$495.00	\$544.50
03/30/23	PA	Email to Jeff Hasson re: correct referral date for Thrive accounts	0.1	\$550.00	\$55.00

EXHIBIT "j"

Date	Initials	Narrative	Units	Rate	Value
03/30/23	PA	Complete first draft of memo in reply re: Mot to Compel CDR discovery	6.0	\$550.00	\$3,300.00
03/30/23	SL	Reviewing motion and facts in preparation of response.	3.2	\$495.00	\$1,584.00
03/31/23	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
03/31/23	BHC	Exchanged email with co-counsel regarding incorrect filing [.1]; telephone call with co-counsel regarding same [.1].	0.2	\$495.00	\$99.00
03/31/23	PA	Draft supplemental declaration in support of motion to compel	0.4	\$550.00	\$220.00
03/31/23	SL	Drafting Reply on MTC to CDR	1.3	\$495.00	\$643.50
04/03/23	BHC	Exchanged emails with co-counsel regarding late filed reply and stipulation [.2].	0.2	\$495.00	\$99.00
04/04/23	PA	Review Sam Leonard's email re: interpretation of CDR spreadsheet, review spreadsheet and respond.	0.3	\$550.00	\$165.00
04/04/23	SL	Reviewing CDR production RE class data	0.5	\$495.00	\$247.50
04/10/23	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
04/10/23	PA	Draft email to CDR counsel re: discussion of discovery order compliance, confirming agreement and identifying issues.	0.6	\$550.00	\$330.00
04/10/23	PA	Review and respond to email from Blythe Chandler : key word search terms.	0.1	\$550.00	\$55.00

Date	Initials	Narrative	Units	Rate	Value
04/10/23	PA	Draft confirming email re: Zoom conference with CDR counsel and forward to Blythe Chandler for review	0.3	\$550.00	\$165.00
04/10/23	PA	Phone call with Mark Case (CDR), Jeff Hasson and Blythe Chandler re: CDR discovery order	0.5	\$550.00	\$275.00
04/11/23	PA	Phone call /w Sam Leonard re: CDR discovery issues.	0.2	\$550.00	\$110.00
04/11/23	SL	Call with co-counsel RE CDR Discovery call	0.3	\$495.00	\$148.50
04/14/23	PA	Draft email confirming substance of meet and confer phone call with CDR			
04/14/23	PA	Phone call with Jeff Hasson, Mark Case and Sam Leonard re: discovery issues	0.4	\$550.00	\$220.00
04/14/23	PA	Phone call with Sam Leonard re: CDR discovery issues	1.1	\$550.00	\$605.00
04/14/23	PA	Phone call with Sam Leonard re: CDR discovery issues	0.5	\$550.00	\$275.00
04/14/23	SL	Call with co-counsel RE CDR Discovery Responses	0.5	\$495.00	\$247.50
04/14/23	SL	Call with opposing counsel RE Spoliation - CDR Putative class member account records	0.6	\$495.00	\$297.00
04/14/23	SL	Drafting confirming letter to CDR	1.0	\$495.00	\$495.00
04/20/23	PA	Draft email to Jeff Hasson re: compliance with discovery order			
04/20/23	PA	Reviewing spreadsheet from CDR	0.5	\$550.00	\$275.00
04/20/23	SL	Call with co-counsel RE CDR discovery	0.2	\$495.00	\$99.00
04/20/23	SL	Call with co-counsel RE CDR discovery	0.4	\$495.00	\$198.00
04/21/23	PA	Phone call with Jeff Hasson re: CDR compliance with discovery order.			
04/21/23	PA	Phone call with Sam Leonard re: CDR compliance with discovery order.	0.3	\$550.00	\$165.00
04/21/23	PA	Review discovery and email Sam Leonard re: interest charges	0.2	\$550.00	\$110.00

Date	Initials	Narrative	Units	Rate	Value
04/24/23	PA	Review and respond to email from Jeff Hasson arguing about language in the Stipulation Extending Time for CDR to Comply with Discovery Order	0.2	\$550.00	\$110.00
04/26/23	PA	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.	0.2	\$550.00	\$110.00
04/26/23	PA	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.	0.1	\$550.00	\$55.00
05/15/23	PA	Review supplemental CDR court-ordered discovery responses, compare with existing data and forward comments to co-counsel	0.4	\$550.00	\$220.00
		Totals	197.0		\$91,009.00