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9 [Additional counsel listed on following page]

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 IRMA FRAUSTO, individually, and on behalf of
all others similarly situated,

13 Plaintiff,

14 v.

15 BANK OF AMERICA, NATIONAL
16 ASSOCIATION, a business entity, form
unknown; and DOES 1 through 10, inclusive,

17 Defendants

Case No. 3:18-cv-01983-LB (*Frausto*)
Case No. 3:18-cv-01202-LB (*Suarez*)

**DECLARATION OF JUSTIN F.
MARQUEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: January 11, 2024
Time: 9:30 a.m.
Courtroom: B – 15th Floor
(Videoconference)
Judge: Hon. Laurel Beeler

19 ARIANNA SUAREZ, individually and on behalf
20 of all others similarly situated,

21 Plaintiff,

22 v.

23 BANK OF AMERICA, N.A. and DOES 1
through 100, inclusive,

24 Defendants

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DECLARATION OF JUSTIN F. MARQUEZ

I, Justin F. Marquez, declare as follows:

1. I am admitted, in good standing, to practice as an attorney in the State of California, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central, Southern, Eastern, and Northern Districts of California. I am a Senior Partner at Wilshire Law Firm, PLC, counsel of record to Plaintiffs Irma Frausto and Arianna Suarez (“Plaintiffs”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. This Declaration is submitted in support of Plaintiffs’ Motion for Attorneys’ Fees and Costs.

CASE BACKGROUND

2. Wilshire Law Firm and Ilg Legal Office (“Class Counsel”) respectfully apply for an award of attorneys’ fees and costs to compensate them for their extensive work in achieving a \$1,890,000 non-reversionary settlement of the wage-and-hour class action on behalf of Plaintiff Irma Frausto (“Frausto”) and Arianna Suarez (“Suarez”) (collectively, “Plaintiffs”) and the putative class with Defendant Bank of America, N.A. (“Defendant” or “the Bank,” and together with Plaintiffs, the “Parties”)

3. The Suarez and Frausto actions started in 2018. Suarez originally filed a putative class action in the Superior Court of the State of California for the county of Alameda, Case No. RG18890674, which the Bank subsequently removed to the Northern District of California on February 23, 2018. Frausto originally filed a putative class action in the Superior Court of the State of California for the County of Alameda, Case No. RG18894308, which the Bank subsequently removed to the Northern District of California on March 30, 2018. Plaintiffs alleged that the Bank violated California’s Labor Code and Unfair Competition Laws. Plaintiffs also sought civil penalties under PAGA for the aforementioned Labor Code violations.

4. The Bank moved to dismiss Frausto’s complaint, and on August 2, 2018, the Court granted in part and denied in part the motion. The Court granted the motion as to the claims for meal and rest break violations to the extent they were predicated on a failure to pay premiums at the recalculated regular rate used to compute overtime wages and dismissed the claims on those

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1 grounds without leave to amend. *Frausto v. Bank of America, National Association*, 2018 WL
 2 3659251, *5 (N.D. Cal. Aug. 2, 2018) (“there is no legally tenable argument that section 226.7
 3 payments should be paid at the ‘regular rate’ used for overtime purposes.”) (“*Frausto I*”).

4 5. The Bank moved for summary judgment in both actions. *Frausto v. Bank of*
 5 *America, N.A.*, 2019 WL 5626640 (N.D. Cal. Oct. 31, 2019); *Suarez v. Bank of America, N.A.*,
 6 2019 WL5626637 (N.D. Cal. Oct. 31, 2019) (“*Frausto II*”). In *Frausto II*, the Court held that there
 7 are triable issues of fact as to Plaintiffs’ Labor Code claims, including her derivative penalty
 8 claims. In doing so, the Court also rejected the Bank’s argument that meal and rest period premium
 9 payments do not qualify as wages for purposes of Labor Code §§ 203 and 226 penalties. *Id.* at *9,
 10 *12. This was a sharply contested issue that the California Supreme Court later resolved in favor
 11 of the plaintiff in *Naranjo v. Spectrum Sec. Servs., Inc.*, 13 Cal.5th 93 (2022).

12 6. On June 14, 2019, Frausto and Suarez moved together for class certification, seeking
 13 to certify a class of “[a]ll persons who worked for [the Bank] in California as a non-exempt
 14 employee” and combining all their remaining claims in that class (Frausto, Dkt. No. 90.)

15 7. In December 2019, the Court granted in part and denied in part Plaintiffs’ motion
 16 for class certification. *Frausto v. Bank of America, N.A.*, 334 F.R.D. 192 (N.D. Cal. 2019)
 17 (“*Frausto III*”). The Court then ordered the Parties to meet and confer and propose revised class
 18 definitions consistent with the Court’s class certification order. (Frausto, Dkt. No. 128.) However,
 19 the Parties were unable to agree upon a class definition.

20 8. The Bank appealed the Court’s class certification order, and the Ninth Circuit denied
 21 the Bank’s petition for permission to appeal. *Frausto v. Bank of America, N.A.*, 2020 WL 1290302
 22 (Feb. 27., 2020) (“*Frausto IV*”).

23 9. On April 1, 2021, the Bank filed a motion for reconsideration of the Court’s class
 24 certification decision. On April 8, 2021, Frausto, along with Suarez, filed a motion for leave to
 25 file a motion for reconsideration of the Court’s class certification order, requesting that the Court
 26 reinstate its original class definition.

27 10. On June 17, 2021, the Court granted the Bank’s motion, denied Frausto’s motion,
 28 and issued an order denying class certification. *Frausto v. Bank of America, N.A.*, 2021 WL

1 2476902 (Jun. 17, 2021) (“*Frausto V*”). In so ruling, the Court found that it was unable to certify
 2 a class because there was no evidence of a de facto policy that prevented putative class members
 3 from taking meal breaks.

4 11. On July 1, 2021, Frausto filed a petition for permission to appeal the Court’s class
 5 certification denial and denial of her request for reconsideration. The Ninth Circuit denied
 6 Frausto’s permission to appeal on November 8, 2021.

7 Settlement Negotiations

8 12. The Parties engaged in a significant amount of investigation, class-wide discovery,
 9 and analysis prior to reaching the proposed settlement. Defendant responded to Plaintiffs’ written
 10 discovery, provided extensive information on the company’s wage and hour policies and practices,
 11 provided the contact information for a random sample of the Settlement Class Members, produced
 12 thousands of pages of relevant documents, and provided three witnesses for depositions. There
 13 was significant motion and appellate work, including a motion to dismiss, motions for summary
 14 judgment, and a contested motion for class certification. It was only after the exchange of a
 15 substantial amount of data and information that the parties participated in four full-day mediation
 16 sessions and ultimately reached this proposed settlement.

17 13. There have been four mediations in the Frausto action. The first mediation occurred
 18 on April 23, 2019, with the Hon. Ronald M. Sabraw (Ret.) of JAMS. The second mediation
 19 occurred on July 30, 2019, with the Hon. Jaime Jacobs May (Ret.) of JAMS and counsel for Frausto
 20 and Suarez. The third mediation occurred on July 23, 2020 with David Rottman, Esq. The fourth
 21 mediation occurred on August 2, 2022 with Jeffrey Krivis, Esq.

22 14. After extensive litigation, negotiations and discussions regarding the strengths and
 23 weaknesses of Plaintiffs’ claims and Defendant’s defenses, the Parties were able to reach an
 24 agreement at the fourth mediation regarding the key terms and provisions of the proposed
 25 settlement. Class Counsel believes that the proposed settlement is fair, reasonable and adequate
 26 and is in the best interest of the Settlement Class Members in light of all known facts and
 27 circumstances, the risk of significant delay, the defenses that could be asserted by Defendant both
 28 to certification and on the merits, trial risk and appellate risk.

1 15. This settlement resolves the risk attendant with continued litigation. Class Counsel
2 believes that the settlement amount is reasonable in light of the Bank’s realistic range of exposure.
3 This is a good result for the Class, particularly in light of the Court’s denial of class certification.
4 Because of the proposed Settlement, Settlement Class Members will be able to receive timely,
5 guaranteed relief and will avoid the risk of an unfavorable judgment.

6 16. Plaintiffs allege that Defendant violated California’s Labor Code and Unfair
7 Competition Laws, and the complaints as amended allege the following claims for relief: (1)
8 Failure to Pay Minimum Wages (Cal. Lab. Code §§ 204, 1194, 1194.2, and 1197); (2) Failure to
9 Pay Overtime Compensation (Cal. Lab. Code §§ 1194 and 1198); (3) Failure to Provide Meal
10 Periods (Cal. Lab. Code §§ 226.7, 512); (4) Failure to Authorize and Permit Rest Periods (Cal.
11 Lab. Code §§ 226.7); (5) Failure to Timely Pay Final Wages at Termination (Cal. Lab. Code §§
12 201-203); (6) Failure to Provide Accurate Itemized Wage Statements (Cal. Lab. Code § 226); (7)
13 Unfair Business Practices (Cal. Bus. & Prof. Code §§ 17200, *et seq.*); and (8) Civil Penalties Under
14 PAGA (Cal. Lab. Code § 2698, *et seq.*). Under the Settlement Agreement, Defendants will pay
15 \$1,500,000.00 (“Gross Settlement Fund”) to resolve this litigation. Additionally, the Parties
16 agreed to an Escalator Clause where, if the total number of Unreleased Individual Pay Periods for
17 all Settlement Class Members is greater than 335,003 then the Gross Settlement Amount will be
18 increased by each full percentage point above 335,003. The Total Class Pay Periods for this case
19 is 423,107, 88,104 or 26% higher than the estimated 335,003. Therefore, with the Escalator
20 Clause, Defendants will pay \$1,890,000.00.

21 17. On or around October 2023, Defendant confirmed the total class size to be notified
22 is 16,577 members. The Class Notice provided Settlement Class Members with the revised
23 settlement amount of \$1,890,000.00, and it also stated that Class Counsel will seek attorney’s fees
24 in an amount up to \$630,000.

25 **Preliminary Approval and Overwhelming Support for the Settlement**

26 18. The Court granted Plaintiff’s Motion for Preliminary Approval of the Settlement on
27 September 8, 2023. In the Order granting Plaintiff’s Motion for Preliminary Approval, The Court
28 stated that the Court will address the issue of attorneys’ fees at the final fairness hearing scheduled

1 for January 11, 2024.

2 19. Notice went out to 16,577 Settlement Class Members on October 16, 2023. The
3 deadline for Settlement Class Members to opt-out or object is November 30, 2023.

4 20. The reaction of the Class to the settlement has been overwhelmingly positive.
5 Indeed, so far, four Settlement Class Members have opted out of the settlement, and no Settlement
6 Class Members have objected to the settlement.

7 ATTORNEYS' FEES AND COSTS

8 21. The settlement provides for attorney's fees and costs to Class Counsel in an amount
9 up to one-third (1/3) of the Gross Settlement Amount, for a maximum fees award of \$630,000.00,
10 plus reasonable litigation expenses to be determined by the court.

11 22. Based on my experience, I believe the fees and costs provision of the Settlement
12 Agreement is reasonable. The fee percentage requested is less than that charged by Class Counsel
13 for other employment cases. Class Counsel invested significant time and resources into the case,
14 with payment deferred to the end of the case, and then, of course, contingent on the outcome. Class
15 Counsel's efforts have resulted in substantial benefits to Settlement Class Members in the form of
16 a significant settlement fund. Without Class Counsel's efforts, settlement fund would not be
17 available to Settlement Class Members.

18 23. The efforts expended by Class Counsel thus far include, but are not limited to, the
19 following: interviewing Plaintiffs; legal research regarding Plaintiffs' claims and anticipated
20 defenses; obtaining, reviewing, and analyzing thousands of pages of documents produced by
21 Defendant; propounding written discovery; reviewing written discovery responses; drafting the
22 original and amended complaints; meeting and conferring with Defendant's counsel to obtain
23 relevant documents and information and on other discovery, pleading and class certification issues;
24 retaining an expert to analyze time and payroll data; working with the expert to analyze the data
25 and prepare a damages analysis; drafting Plaintiff's mediation brief; attending four mediations and
26 several court hearings; negotiating, drafting, and revising the Stipulation, Class Notice and Dispute
27 Form; drafting the Motion for Preliminary Approval; drafting the Motion for Attorneys' Fees and
28 Costs; and drafting the Motion for Final Approval.

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1 are experienced in litigating Labor Code violations in both individual, class action, and
2 representative action cases. Wilshire Law Firm, PLC has handled, and is currently handling,
3 numerous wage and hour class action lawsuits, as well as class actions involving consumer rights
4 and data privacy litigation.

5 29. I graduated from the University of California, Los Angeles’s College Honors
6 Program in 2004 with Bachelor of Arts degrees in History and Japanese, *magna cum laude* and *Phi*
7 *Beta Kappa*. As an undergraduate, I also received a scholarship to study abroad for one year at
8 Tokyo University in Tokyo, Japan. I received my Juris Doctor from Notre Dame Law School in
9 2008.

10 30. My practice is focused on advocating for the rights of consumers and employees in
11 class action litigation and appellate litigation. I am currently the primary attorney in charge of
12 litigating several class action cases in state and federal courts across the United States.

13 31. I have received numerous awards for my legal work. From 2017 to 2020, Super
14 Lawyers selected me as a “Southern California Rising Star,” and in 2022 and 2023, I was selected
15 as a “Southern California Super Lawyer.” I was selected as one of the “Best Lawyers in America”
16 in 2023 and 2024. In 2016 and 2017, the National Trial Lawyers selected me as a “Top 40 Under
17 40” attorney. I am also rated 10.0 (“Superb”) by Avvo.com.

18 32. I am on the California Employment Lawyers Association (“CELA”)’s Wage and
19 Hour Committee and Mentor Committee, and I was selected to speak at CELA’s 2019 Advanced
20 Wage & Hour Seminar on the topic of manageability of class actions. Since 2013, I have actively
21 mentored young attorneys through CELA’s mentorship program.

22 33. I am also a past member of the Consumer Attorneys of California (“CAOC”). In
23 2020, I was selected for a position on CAOC’s Board of Directors. I am also a past member of
24 CAOC’s Diversity Committee, and I helped assist the CAOC in defeating bills that harm
25 employees. Indeed, I recently helped assist Jacqueline Serna, Esq., Legislative Counsel for CAOC,
26 in defeating AB 443, which proposed legislation that sought to limit the enforceability of California
27 Labor Code § 226.

28 34. As the attorney responsible for day-to-day management of this matter at the

1 Wilshire Law Firm, PLC, I have over thirteen years of experience with litigating wage and hour
2 class actions. Over the last thirteen years, I have managed and assisted with the litigation and
3 settlement of several wage and hour class actions. In those class actions, I performed similar tasks
4 as those performed in the course of prosecuting this action. My litigation experience includes:

- 5 a. I served as lead or co-lead in negotiating class action settlements worth over \$10
6 million in gross recovery to class members for each year since 2020, including over
7 \$37.5 million in 2022 and over \$70 million in 2023.
- 8 b. I was part of the team of attorneys that prevailed in *Moore v. Centrelake Medical*
9 *Group, Inc.*, 83 Cal.App.5th 515 (2022), the first California appellate decision in a
10 data breach class action holding that consumer plaintiffs adequately alleged injury
11 in fact under the benefit of the bargain theory and monitoring-costs theory.
- 12 c. In 2022, Top Verdict recognized Wilshire Law Firm and myself for having one case
13 in the Top 20 Labor & Employment Settlements in 2021 (including number 19 for
14 the \$1.6 million settlement in *Moreno v. Pretium Packaging, L.L.C*) and four
15 additional cases in the Top 50 Labor & Employment Settlements in 2021 (numbers
16 27, 30, 33, and 37).
- 17 d. To my knowledge, I am the only attorney to appear on each of the following Top
18 Verdict lists for 2018 in California: Top 20 Civil Rights Violation Verdicts, Top 20
19 Labor & Employment Settlements, and Top 50 Class Action Settlements.
- 20 e. I was the primary author of the class certification and expert briefs in *ABM*
21 *Industries Overtime Cases*, 19 Cal.App.5th 277 (2017), a wage and hour class action
22 for over 40,000 class members for off-the-clock, meal period, split shift, and
23 reimbursement claims. *ABM Industries Overtime Cases* is the first published
24 California appellate authority to hold that an employer’s “auto-deduct policy for
25 meal breaks in light of the recordkeeping requirements for California employers is
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1 also an issue amenable to classwide resolution.” *Id.* at 310.¹ Notably, the Court of
 2 Appeal also held that expert analysis of timekeeping records can also support the
 3 predominance requirement for class certification. *Id.* at 310-11. In 2021, the case
 4 settled for \$140 million, making it one of the largest ever wage and hour class action
 5 settlements for hourly-paid employees in California.

6 f. I briefed, argued, and won *Yocupicio v. PAE Group, LLC*, 795 F.3d 1057 (9th Cir.
 7 2015). The Ninth Circuit ruled in my client’s favor and held that non-class claims
 8 under California’s Private Attorney Generals Act (“PAGA”) cannot be used to
 9 calculate the amount in controversy under the Class Action Fairness Act (“CAFA”).
 10 This case is cited in several leading treatises such as Wright & Miller’s Federal
 11 Practice & Procedure, and Newberg on Class Actions. In October 2016, the U.S.
 12 Supreme Court denied review of a case that primarily concerned *Yocupicio*. That
 13 effort was led by Theodore J. Boutrous, who brought the cert petition, with amicus
 14 support from a brief authored by Andrew J. Pincus.² Considering that leading
 15 Supreme Court practitioners from the class action defense bar were very motivated
 16 in undermining *Yocupicio* case, but failed, this demonstrates the national importance
 17 of the *Yocupicio* decision.

18 g. On December 13, 2018, the United States District Court granted final approval of
 19 the \$2,500,000 class action settlement in *Mark Brulee, et al. v. DAL Global Services,*
 20 *LLC*, No. CV 17-6433 JVS(JCGx), 2018 WL 6616659 (C.D. Cal. Dec. 13, 2018) in
 21 which I served as lead counsel. In doing so, the Court found: “Class Counsel’s
 22 declarations show that the attorneys are experienced and successful litigators.” *Id.*
 23 at *10.

24 h. *Gasio v. Target Corp.*, 2014 U.S. Dist. LEXIS 129852 (C.D. Cal. Sep. 12, 2014), a

25
 26 ¹ As a California district court observed before the *ABM Industries Overtime* decision,
 27 “[t]he case law regarding certification of auto-deduct classes is mixed.” *Wilson v. TE*
 28 *Connectivity Networks, Inc.*, No. 14-CV-04872-EDL, 2017 WL 1758048, *7 (N.D. Cal. Feb. 9,
 2017).

² <http://www.chamberlitigation.com/cases/abm-industries-inc-v-castro>.

1 reported decision permitting class-wide discovery even though the employer has a
2 lawful policy because “[t]he fact that a company has a policy of not violating the
3 law does not mean that the employees follow it, which is the issue here.” The court
4 also ordered defendant to pay for the cost of *Belaire-West* notice.

- 5 i. In 2013, I represented a whistleblower that reported that his former employer was
6 defrauding the State of California with the help of bribes to public employees. The
7 case, a false claims (qui tam) action, resulted in the arrest and criminal prosecution
8 of State of California employees by the California Attorney General’s Office.
- 9 j. In 2013, I was part of a team of attorneys that obtained conditional certification for
10 over 2,000,000 class members in a federal labor law case for misclassification of
11 independent contractors that did crowdsourced work on the Internet, *Otey v.*
12 *CrowdFlower, Inc.*, N.D. Cal. Case No. 12-cv-05524-JST (MEJ), resulting in the
13 following pro-plaintiff reported decisions:

- 14 i. 2013 U.S. Dist. LEXIS 151846 (N.D. Cal. Oct. 22, 2013) (holding that an
15 unaccepted Rule 68 offer doesn’t moot plaintiff’s claims, and granting
16 plaintiff’s motion to strike defendant’s affirmative defenses based on
17 *Twombly/Iqbal*).
- 18 ii. 2013 U.S. Dist. LEXIS 122007 (N.D. Cal. Aug. 27, 2013) (order granting
19 conditional collective certification).
- 20 iii. 2013 U.S. Dist. LEXIS 95687 (N.D. Cal. July 8, 2013) (affirming the
21 magistrate judge’s discovery ruling which held that “evidence of other
22 sources of income is irrelevant to the question of whether a plaintiff is an
23 employee within the meaning of the FLSA”).
- 24 iv. 2013 U.S. Dist. LEXIS 91771 (N.D. Cal. June 20, 2013) (granting broad
25 discovery because “an FLSA plaintiff is entitled to discovery from locations
26 where he never worked if he can provide some evidence to indicate
27 company-wide violations”).

- 28 k. From 2012 to 2013, I was part of a team of attorneys that obtained class certification

1 for over 60,000 class members for off-the-clock claims, *Linares v. Securitas*
 2 *Security Services USA, Inc.*, Los Angeles Superior Court No. BC416555. We also
 3 successfully opposed subsequent appeals to the California Court of Appeal and
 4 California Supreme Court.

5 35. My current contingent billing rate of \$1,500.00 per hour is consistent with my actual
 6 billing rate for paid legal industry consulting services, my practice area, lead appellate experience
 7 in the Ninth Circuit Court of Appeals, numerous awards received, legal market and accepted hourly
 8 rates:

- 9 a. I have been paid for legal industry consulting services at \$1,500 per hour by
 10 Gerson Lehrman Group (GLG), a company that provides financial information and
 11 advises investors and consultants with business clients seeking expert advice. GLG
 12 is one of the largest companies that provides expert consulting services. GLG's
 13 clients include corporations, hedge funds, private equity firms, and consulting firms.
 14 I have worked with GLG on numerous occasions at a rate of \$1,500 per hour,
 15 including on three recent occasions in October and November of 2023.
- 16 b. On May 6, 2022, the Hon. Jay A. Garcia-Gregory of the United States District
 17 Court in Puerto Rico approved my \$850 hourly rate when he granted final
 18 approval of the class action settlement in *Serrano v. Inmediata Corp.*, No. 3:19-
 19 cv-01811-JAG, Dkt. 57 (U.S. Dist. Ct. P.R. May 6, 2022).
- 20 c. On September 9, 2021, the Hon. Peter Wilson of the Orange County Superior Court
 21 approved my \$800 hourly rate when he granted final approval of the class action
 22 settlement in *Ricardo Campos Hernandez v. Adams Iron Co., Inc.*, No. 30-2019-
 23 01066522-CU-OE-CXC.
- 24 d. On August 6, 2021, the Hon. Stanley Blumenfeld, Jr. of the United States District
 25 Court granted final approval of the \$1,600,000 class action settlement in *Carlos*
 26 *Moreno v. Pretium Packaging, Inc.* (C.D. Cal. Aug. 6, 2021) No. 8:19-cv-02500-
 27 SB-DFM, 2021 WL 3673845 in which I served as lead counsel. In doing so, the
 28 Court approved my then \$750 hourly rate after finding it was "reasonable, given the

1 qualifications of the attorneys who worked on this matter.” (*Id.* at p. *3.)

2 e. On January 19, 2021, the Hon. Elihu M. Berle of the Los Angeles County Superior
3 Court approved my \$750 hourly rate when he granted final approval of the class
4 action settlement in *Faye Zhang v. Richemont North America, Inc.*, Case No.
5 19STCV32396.

6 36. Thiago M. Coelho is the chair of the consumer and data privacy class action
7 departments at Wilshire Law Firm. As lead counsel for the published California Appellate decision
8 *Moore v. Centrelake Med. Grp., Inc.*, 83 Cal. App. 5th 515, 519 (2022), *review denied* (Dec. 14,
9 2022), he successfully overturned the trial court’s dismissal in a data breach class action against a
10 medical facility provider. This landmark case established precedent in several key data breach
11 areas, including the standard for acceptable credit monitoring costs theory, and the acceptance of
12 benefit of the bargain damages theory under the UCL and breach of contract for data breach cases.
13 Mr. Coelho has litigated over 300 class action cases, demonstrating his extensive experience across
14 all stages of litigation, including appellate and trial. Some of his notable cases as lead counsel
15 include *Peters v. Apple Inc.*, No. 19STCV21787 (L.A. Super. Ct. filed June 21, 2019) (October 30,
16 2023 preliminary approval granted of \$25 million dollar common fund settlement); *Mier v. CVS*
17 *Health*, No. 22-55665, 2023 WL 4837851 (9th Cir. Jul. 28, 2023) (remand of denial of class
18 certification); *Seranno et al. v. Inmediata Corp.*, No. 3:19-cv-01811-JAG, Dkt. 57 (U.S. Dist. Ct.
19 P.R. May 6, 2022) (appointed lead counsel in a hospital data breach class action which reached a
20 settlement valued at \$14 million and approving a rate of \$650 per hour for Mr. Coelho);
21 *Schumacher v. Bank of Hope*, No. 18STCV02066 (Cal. Super. Ct.) (appointed lead counsel in a
22 bank data breach class action which reached a settlement valued at \$13.3 million); *Alcazar v.*
23 *Fashion Nova, Inc.*, No. 4:20-cv-01434 (N.D. Cal.) (granted class certification and appointed lead
24 counsel). Currently, Mr. Coelho is litigating class action cases in 11 different states. In addition
25 to his litigation experience, Mr. Coelho served as the president of The Data Privacy Trial Lawyers
26 Association—Top 10 National Trial Lawyers Top 10 for the years 2020 and 2021. Mr. Coelho is
27 a member of the Consumer Attorneys of California (CAOC) Data Breach Committee, which
28 drafted and lobbied for the landmark California Consumer Privacy Act of 2018 (CCPA). Mr.

1 Coelho has been recognized as a Super Lawyer, Rising Star and selected for the Best Lawyers in
2 America: Ones to Watch. Mr. Coelho earned his law degree from the University of Southern
3 California Gould School of Law. Mr. Coelho’s current hourly rate is \$1,000 per hour.

4 37. Bradford Smith is a Law and Motion Attorney at Wilshire Law Firm. He graduated
5 from the University of California, Irvine with a Bachelor of Arts in History and received his Juris
6 Doctor from Loyola Law School, Los Angeles in 2022. He was admitted to practice law in the
7 State of California in 2022. Before joining Wilshire Law Firm, he worked at a law firm
8 specializing in insurance defense litigation. His focus now is on wage and hour class action
9 litigation. Mr. Smith’s current hourly rate is \$400 per hour.

10 38. The reasonableness of my firm’s hourly rates is also supported by several surveys
11 of legal rates, including the following:

12 a. The 2022 Real Rate Report survey compiled by Wolters Kluwer, which presents the
13 real market rates of Los Angeles area attorneys who practice litigation. For that
14 category, the third quartile 2022 rate was \$1,045 per hour for partners and \$855 for
15 associates. Likewise, page 32 of the Report describes the rates charged by 183 Los
16 Angeles partners with “21 or more years of experience” and “Fewer than 21 years.”
17 For those categories, the third quartile Los Angeles partner rate in 2022 were \$1,133
18 per hour for 21 or more years and \$1,075 for attorneys with fewer than 21 years. A
19 true and correct copy of portions of the 2022 Real Rate Report is attached hereto as
20 **Exhibit 1.**

21 b. In an article entitled “Big Law Rates Topping \$2,000 Leave Value ‘In Eye of
22 Beholder,’” written by Roy Strom and published by Bloomberg Law on June 9,
23 2022, the author describes how Big Law firms have crossed the \$2,000-per hour
24 rate. The article also notes that law firm rates have been increasing by just under
25 3% per year. A true and correct copy of this article is attached hereto as **Exhibit 2.**

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WILSHIRE LAW FIRM'S LODESTAR AND COSTS

39. The total current lodestar for Wilshire Law Firm is not less than the following:

Person	Role	Hours	Rate	Lodestar
Justin F. Marquez	Senior Partner	1,000.6	\$1,500	\$1,500,900
Thiago Coelho	Attorney	821.8	\$1,000	\$821,800
Bradford Smith	Attorney	20	\$400	\$8,000
Total		1,842.4		\$2,330,700

40. All the hours claimed by Plaintiff's counsel were reasonably necessary to litigate this matter. Attached as **Exhibit 3** to this declaration is a copy of Wilshire Law Firm's timesheets in this matter, which accurately state the hours contemporaneously recorded by the attorneys at Wilshire Law Firm.

41. There are additional hours devoted by me (and by my colleagues) to this litigation that are not captured in Wilshire Law Firm's timesheets, but Plaintiff's counsel does not seek to recover such hours in their Motion. I estimate that there are an additional 500 hours spent by attorneys Robert Dart, Nicol Hajjar, Benjamin Haber, Patty Chen, and Rachel Vinson on this matter that we are not including in our lodestar. These figures do not any time spent after filing the Motion for Attorneys' Fees and Costs, such as any follow up work related to administering the settlement.

42. I estimate that Wilshire Law Firm will spend another 20-30 hours on this case, performing tasks such as preparing for and appearing at the Final Fairness Hearing, overseeing the settlement administration process, and responding to inquiries from Settlement Class Members. Based on my experience, after the notice is mailed, numerous Settlement Class Members will call my office to inquire about the status of the case and to ask for further information. We also bear the risk of taking whatever actions are necessary if Defendant fails to pay. In one of my recent cases, my firm spent over 50 hours, post-final approval, in collection efforts on behalf of the class.

43. As of the drafting of this motion, my office has incurred \$194,971.64 in expenses litigating this action. These expenses were reasonably necessary to the litigation and were actually incurred by my office. They should be reimbursed in full, up to the maximum amount allowed in

1 the Settlement Agreement. Attached as **Exhibit 4** to this declaration is a breakdown of costs
2 incurred by my office.

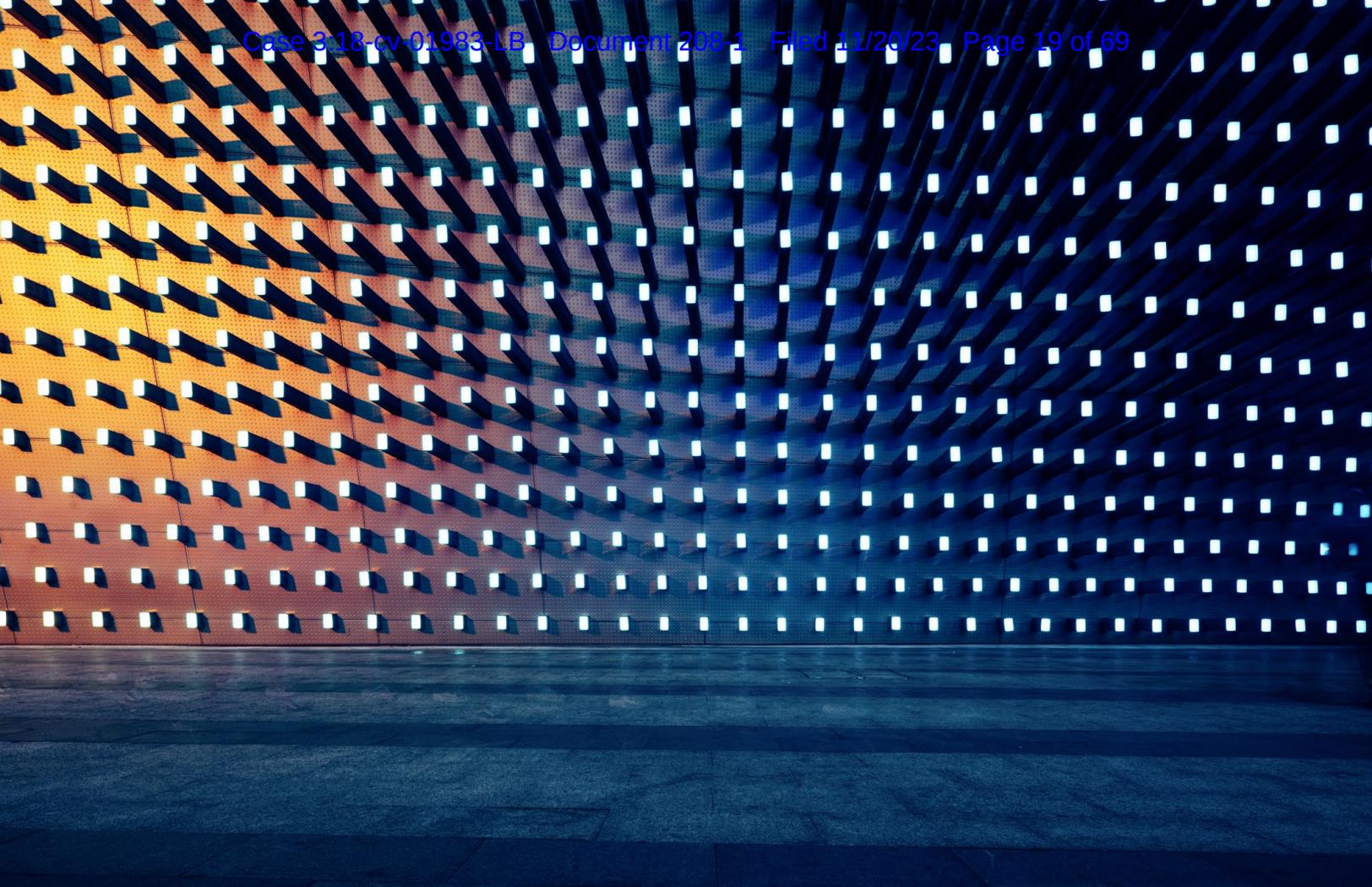
3 I declare under penalty of perjury under the laws of the State of California and the
4 United States that the foregoing is true and correct.

5 Executed on November 20, 2023, in Los Angeles, California.

6
7
8 */s/ Justin F. Marquez*
9 _____
10 Justin F. Marquez

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WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd, 12th Floor
Los Angeles, CA 90010-1137

Exhibit 1



ELM Solutions

2022 Real Rate Report[®]

The industry's leading
analysis of law firm rates,
trends, and practices

Table of Contents - 2022 Real Rate Report

A Letter to Our Readers • 4

Report Use Considerations • 5

Section I: High-Level Data Cuts • 8

- Partners, Associates, and Paralegals
- Partners, Associates, and Paralegals by Practice Area and Matter Type
- Partners and Associates by City
- Partners and Associates by City and Matter Type
- Partners by City and Years of Experience
- Associates by City and Years of Experience
- Partners and Associates by Firm Size and Matter Type

Section II: Industry Analysis • 63

- Partners, Associates, and Paralegals by Industry Group
- Partners and Associates by Industry Group and Matter Type
- Basic Materials and Utilities
- Consumer Goods
- Consumer Services
- Financials (Excluding Insurance)
- Health Care
- Industrials
- Technology and Telecommunications

Section III: Practice Area Analysis • 84

- Bankruptcy and Collections
- Commercial
- Corporate: Mergers, Acquisitions, and Divestitures
- Corporate: Regulatory and Compliance
- Corporate: Other
- Employment and Labor
- Environmental
- Finance and Securities
- General Liability (Litigation Only)
- Insurance Defense (Litigation Only)
- Intellectual Property: Patents
- Intellectual Property: Trademarks
- Intellectual Property: Other
- Real Estate

Section IV: In-Depth Analysis for Select US Cities • 172

- Boston, MA
- Chicago, IL
- Los Angeles, CA
- New York, NY
- Philadelphia, PA
- San Francisco, CA
- Washington, DC

Section V: International Analysis • 191

Section VI: Matter Staffing Analysis • 221

Appendix: Data Methodology • 226

Report Use Considerations

2022 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

All data and analysis based on
data collected thru Q2 2022

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Jackson MS	Litigation	Associate	56	\$55	\$225	\$250	\$178	\$203	\$175
		Partner	24	\$315	\$420	\$485	\$418	\$394	\$375
	Non-Litigation	Associate	25	\$55	\$126	\$255	\$155	\$125	\$259
Kansas City MO	Litigation	Partner	74	\$413	\$450	\$556	\$472	\$450	\$450
		Associate	50	\$252	\$329	\$385	\$319	\$316	\$305
	Non-Litigation	Partner	101	\$411	\$487	\$615	\$519	\$487	\$464
		Associate	73	\$250	\$320	\$385	\$322	\$312	\$285
Las Vegas NV	Non-Litigation	Partner	20	\$350	\$425	\$525	\$440	\$422	\$432
		Associate	11	\$238	\$267	\$368	\$301	\$297	\$282
Little Rock AR	Non-Litigation	Partner	11	\$215	\$215	\$308	\$264	\$256	\$298
Los Angeles CA	Litigation	Partner	322	\$516	\$725	\$1,045	\$799	\$739	\$702
		Associate	408	\$400	\$615	\$855	\$642	\$606	\$564
	Non-Litigation	Partner	521	\$596	\$868	\$1,201	\$903	\$902	\$858
		Associate	667	\$441	\$603	\$845	\$653	\$712	\$648

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Minneapolis MN	Non-Litigation	Associate	83	\$340	\$421	\$528	\$425	\$408	\$384
Nashville TN	Litigation	Partner	24	\$275	\$320	\$456	\$363	\$378	\$403
	Non-Litigation	Partner	78	\$412	\$484	\$576	\$505	\$481	\$470
		Associate	59	\$270	\$330	\$384	\$340	\$315	\$285
New Orleans LA	Litigation	Partner	47	\$290	\$332	\$412	\$343	\$330	\$340
		Associate	42	\$231	\$243	\$340	\$278	\$290	\$275
	Non-Litigation	Partner	32	\$295	\$347	\$405	\$419	\$380	\$391
		Associate	21	\$244	\$250	\$278	\$273	\$303	\$258
New York NY	Litigation	Partner	614	\$475	\$675	\$1,088	\$808	\$784	\$746
		Associate	631	\$323	\$460	\$729	\$545	\$527	\$509
	Non-Litigation	Partner	1,376	\$765	\$1,235	\$1,638	\$1,189	\$1,139	\$1,090
		Associate	1,809	\$550	\$776	\$1,050	\$796	\$766	\$716
Oklahoma City OK	Non-Litigation	Partner	14	\$235	\$338	\$393	\$337	\$319	\$311
Omaha NE	Litigation	Partner	12	\$293	\$339	\$353	\$329	\$338	\$341

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Rochester NY	Non-Litigation	Partner	12	\$270	\$360	\$488	\$386	\$341	\$446
		Associate	13	\$220	\$310	\$375	\$314	\$278	\$287
Sacramento CA	Non-Litigation	Partner	11	\$381	\$437	\$682	\$534	\$559	\$516
Salt Lake City UT	Litigation	Partner	14	\$246	\$353	\$468	\$363	\$333	\$379
		Associate							
	Non-Litigation	Partner	42	\$297	\$371	\$447	\$391	\$363	\$353
San Diego CA	Litigation	Associate	23	\$151	\$225	\$300	\$255	\$258	\$264
		Partner							
	Non-Litigation	Partner	89	\$332	\$540	\$1,066	\$699	\$667	\$649
San Francisco CA	Litigation	Partner	143	\$423	\$675	\$995	\$742	\$711	\$691
		Associate	98	\$325	\$430	\$731	\$525	\$517	\$470
	Non-Litigation	Partner	221	\$475	\$750	\$950	\$758	\$746	\$741
San Jose CA	Litigation	Associate	151	\$338	\$486	\$702	\$545	\$563	\$507
		Partner	33	\$654	\$921	\$1,133	\$916	\$907	\$864

Section I: High-Level Data Cuts**Cities**

By Matter Type

2022 - Real Rates for Associate and Partner**Trend Analysis - Mean**

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
San Jose CA	Litigation	Associate	22	\$461	\$580	\$745	\$608	\$593	\$498
		Partner	50	\$660	\$864	\$1,303	\$969	\$985	\$887
	Non-Litigation	Associate	46	\$380	\$460	\$775	\$616	\$639	\$567
Seattle WA	Litigation	Partner	76	\$497	\$655	\$760	\$635	\$567	\$510
		Associate	61	\$394	\$468	\$530	\$447	\$453	\$395
	Non-Litigation	Partner	148	\$410	\$526	\$760	\$571	\$547	\$547
		Associate	113	\$310	\$395	\$502	\$422	\$401	\$377
St. Louis MO	Litigation	Partner	46	\$260	\$350	\$435	\$376	\$373	\$388
		Associate	17	\$197	\$225	\$250	\$228	\$237	\$232
	Non-Litigation	Partner	57	\$352	\$419	\$540	\$451	\$446	\$473
Tampa FL	Litigation	Partner	31	\$369	\$508	\$595	\$490	\$467	\$452
		Associate	15	\$269	\$298	\$368	\$316	\$302	\$306
Trenton NJ	Non-Litigation	Partner	21	\$408	\$600	\$700	\$569	\$620	\$581
		Associate	12	\$480	\$495	\$500	\$448	\$376	\$387

Section I: High-Level Data Cuts

Cities

By Years of Experience

2022 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
Kansas City MO	3 to Fewer Than 7 Years	15	\$270	\$325	\$360	\$318	\$295	\$283
	7 or More Years	28	\$292	\$334	\$391	\$333	\$312	\$302
Los Angeles CA	Fewer Than 3 Years	63	\$429	\$595	\$654	\$556	\$524	\$488
	3 to Fewer Than 7 Years	144	\$486	\$688	\$838	\$662	\$626	\$530
	7 or More Years	171	\$351	\$550	\$840	\$600	\$634	\$586
Miami FL	3 to Fewer Than 7 Years	19	\$300	\$360	\$457	\$380	\$331	\$313
	7 or More Years	36	\$295	\$450	\$595	\$460	\$433	\$385
Minneapolis MN	Fewer Than 3 Years	11	\$374	\$405	\$446	\$408		\$230
	3 to Fewer Than 7 Years	27	\$340	\$451	\$510	\$421	\$358	\$356
	7 or More Years	27	\$423	\$468	\$585	\$478	\$438	\$392
Nashville TN	7 or More Years	12	\$219	\$245	\$345	\$282	\$266	\$262
New Orleans LA	3 to Fewer Than 7 Years	12	\$232	\$243	\$265	\$261	\$242	\$245
	7 or More Years	18	\$243	\$312	\$343	\$306	\$318	\$294
New York NY	Fewer Than 3 Years	142	\$443	\$622	\$775	\$629	\$600	\$652

Section I: High-Level Data Cuts**Cities**

By Years of Experience

2022 - Real Rates for Partner**Trend Analysis - Mean**

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
Kansas City MO	Fewer Than 21 Years	46	\$400	\$450	\$537	\$473	\$411	\$397
	21 or More Years	68	\$440	\$553	\$658	\$539	\$497	\$491
Las Vegas NV	Fewer Than 21 Years	12	\$284	\$381	\$495	\$389	\$349	\$343
	21 or More Years	13	\$350	\$425	\$515	\$468	\$456	\$472
Los Angeles CA	Fewer Than 21 Years	183	\$533	\$801	\$1,075	\$804	\$797	\$682
	21 or More Years	333	\$550	\$765	\$1,133	\$863	\$842	\$808
Memphis TN	Fewer Than 21 Years	14	\$288	\$331	\$380	\$345	\$317	\$328
	21 or More Years	15	\$355	\$415	\$425	\$394	\$382	\$375
Miami FL	Fewer Than 21 Years	57	\$370	\$450	\$598	\$490	\$498	\$443
	21 or More Years	104	\$388	\$581	\$749	\$584	\$580	\$536
Milwaukee WI	21 or More Years	16	\$302	\$454	\$613	\$589	\$515	\$530
Minneapolis MN	Fewer Than 21 Years	36	\$470	\$530	\$607	\$532	\$486	\$499
	21 or More Years	84	\$507	\$675	\$796	\$656	\$620	\$589
Nashville TN	Fewer Than 21 Years	28	\$375	\$405	\$535	\$449	\$405	\$397

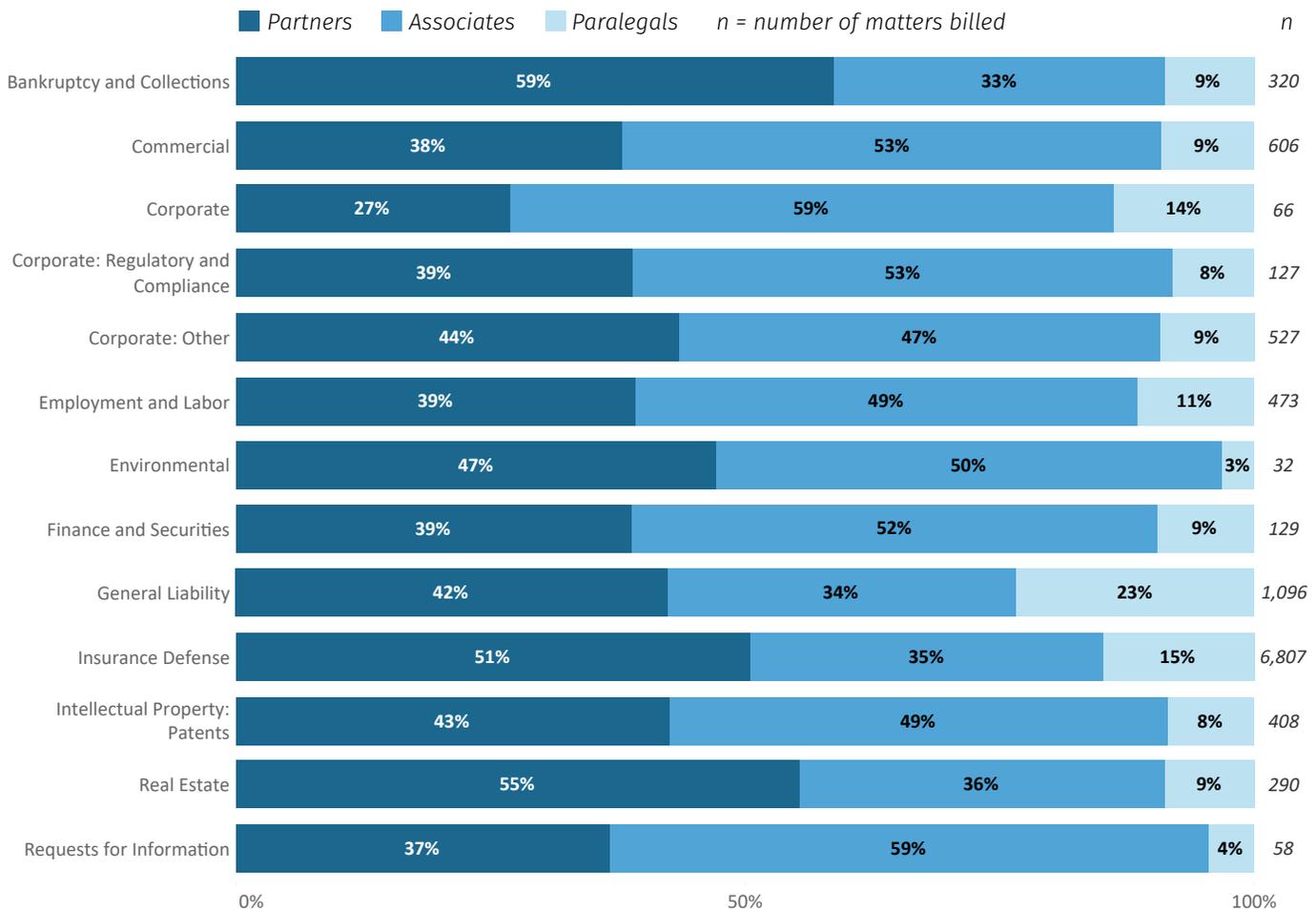
Section VI: Matter Staffing Analysis

All data and analysis based on
data collected thru Q2 2022

Section VI: Matter Staffing Analysis

Long Litigation Matters, More Than 100 Total Hours Billed

2019 to 2022 -- Percentage of Hours Billed per Matter



Section VII: Data Methodology

All data and analysis based on
data collected thru Q2 2022

Appendix: Data Methodology

Invoice Information

Data in Wolters Kluwer ELM Solutions' reference database and the 2022 Real Rate Report were taken from invoice line-item entries contained in invoices received and approved by participating companies.

Invoice data were received in the Legal Electronic Data Exchange Standard (LEDES) format (LEDES.org). The following information was extracted from those invoices and their line items:

- Law firm (which exists as a random number in the ELM Solutions reference database)
- Timekeeper ID (which exists as a random number in the ELM Solutions reference database)
- Matter ID (which exists as a random number in the ELM Solutions reference database)
- Timekeeper's position (role) within the law firm (partner, associate, paralegal, etc.)
- Uniform Task-Based Management System Code Set, Task Codes, and Activity Codes (UTBMS.com)
- Date of service
- Hours billed
- Hourly rate billed
- Fees billed

Non-Invoice Information

To capture practice area details, the matter ID within each invoice was associated with matter profiles containing areas of work in the systems of each company. The areas of work were then systematically categorized into legal practice areas. Normalization of practice areas was done based on company mappings to system-level practice areas available in the ELM Solutions system and by naming convention.

The majority of analyses included in this report have been mapped to one of 11 practice areas, further divided into sub-areas and litigation/non-litigation (for more information on practice areas and sub-areas, please refer to pages 232-234).

To capture location and jurisdiction details, law firms and timekeepers were systematically mapped to the existing profiles within ELM Solutions systems, as well as with publicly available data sources for further validation and normalization. Where city location information is provided, it includes any address within that city's defined Core-Based Statistical Area (CBSA) as defined by the Office of Management and Budget (OMB). The CBSAs are urban centers with populations of 10,000 or more and include all adjacent counties that are economically integrated with that urban center.

Where the analyses focus on partners, associates, and paralegals, the underlying data occasionally included some sub-roles, such as "senior partner" or "junior associate." In such instances, those timekeeper sub-roles were placed within the broader partner, associate, and paralegal segments.

Demographics regarding law firm size, location, and lawyer years of experience were augmented by incorporating publicly available information.

Appendix: Data Methodology

A Note on US Cities

Principal City	CBSA Name
Hartford, CT	Hartford-East Hartford-Middletown, CT
Honolulu, HI	Urban Honolulu HI
Houston, TX	Houston-The Woodlands-Sugar Land, TX
Indianapolis, IN	Indianapolis-Carmel-Anderson, IN
Jackson, MS	Jackson, MS
Jacksonville, FL	Jacksonville, FL
Kansas City, MO	Kansas City, MO-KS
Lafayette, LA	Lafayette, LA
Las Vegas, NV	Las Vegas-Henderson-Paradise, NV
Lexington, KY	Lexington-Fayette, KY
Little Rock, AR	Little Rock-North Little Rock-Conway, AR
Los Angeles, CA	Los Angeles-Long Beach-Anaheim, CA
Louisville, KY	Louisville/Jefferson County, KY-IN
Madison, WI	Madison, WI
Memphis, TN	Memphis-Forrest City, TN-MS-AR
Miami, FL	Miami-Fort Lauderdale-Pompano Beach, FL
Milwaukee, WI	Milwaukee-Waukesha, WI
Minneapolis, MN	Minneapolis-St. Paul-Bloomington, MN-WI
Nashville, TN	Nashville-Davidson-Murfreesboro-Franklin, TN
New Haven, CT	New Haven-Milford, CT
New Orleans, LA	New Orleans-Metairie, LA
New York, NY	New York-Newark-Jersey City, NY-NJ-PA
Oklahoma City, OK	Oklahoma City, OK
Omaha, NE	Omaha-Council Bluffs, NE-IA
Orlando, FL	Orlando-Kissimmee-Sanford, FL
Philadelphia, PA	Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
Phoenix, AZ	Phoenix-Mesa-Chandler, AZ
Pittsburgh, PA	Pittsburgh, PA
Portland, ME	Portland-South Portland, ME
Portland, OR	Portland-Vancouver-Hillsboro, OR-WA
Providence, RI	Providence-Warwick, RI-MA
Raleigh, NC	Raleigh-Cary, NC
Reno, NV	Reno-Carson City-Fernley, NV

Appendix: Data Methodology

Bankruptcy and Collections

Chapter 11	General/Other
Collections	Workouts and Restructuring

Commercial (Commercial Transactions and Agreements)

Contract Breach or Dispute
General, Drafting, and Review
General/Other

Corporate¹

Antitrust and Competition	Partnerships and Joint Ventures
Corporate Development	Regulatory and Compliance
General/Other	Tax
Governance	Treasury
Information and Technology	White Collar/Fraud/Abuse
Mergers, Acquisitions, and Divestitures	

Employment and Labor

ADA	General/Other
Agreements	Immigration
Compensation and Benefits	Union Relations and Negotiations/NLRB
Discrimination, Retaliation, and Harassment/EEO	Wages, Tips, and Overtime
Employee Dishonesty/Misconduct	Wrongful Termination
ERISA	

Environmental

General/Other	Superfund
Health and Safety	Waste/Remediation

Finance and Securities

Commercial Loans and Financing	Investments and Other Financial Instruments
Debt/Equity Offerings	Loans and Financing
Fiduciary Services	SEC Filings and Financial Reporting
General/Other	Securities and Banking Regulations

General Liability

Asbestos/Mesothelioma	Personal Injury/Wrongful Death
Auto and Transportation	Premises
Consumer Related Claims	Product and Product Liability
Crime, Dishonesty and Fraud	Property Damage
General/Other	Toxic Tort

¹ All references to "Corporate: General/Other" in the Real Rate Report are the aggregation of all Corporate sub-areas excluding the Mergers, Acquisitions, and Divestitures sub-area and the Regulatory and Compliance sub-area.

Exhibit 2

Free Newsletter Sign Up

Business & Practice

Big Law Rates Topping \$2,000 Leave Value ‘In Eye of Beholder’

By Roy Strom

Column

June 9, 2022, 2:30 AM

Welcome back to the Big Law Business column on the changing legal marketplace written by me, Roy Strom. Today, we look at a new threshold for lawyers' billing rates and why it's so difficult to put a price on high-powered attorneys. Sign up to receive this column in your inbox on Thursday mornings. Programming note: Big Law Business will be off next week.

Some of the nation's top law firms are charging more than \$2,000 an hour, setting a new pinnacle after a two-year burst in demand.

Partners at Hogan Lovells and Latham & Watkins have crossed the threshold, according to court documents in bankruptcy cases filed within the past year.

Other firms came close to the mark, billing more than \$1,900, according to the documents. They include Kirkland & Ellis, Simpson Thacher & Bartlett, Boies Schiller Flexner, and Sidley Austin.

Simpson Thacher & Bartlett litigator Bryce Friedman, who helps big-name clients out of jams, especially when they're accused of fraud, charges \$1,965 every 60 minutes, according to a court document.

In need of a former acting US Solicitor General? Hogan Lovells partner Neal Katyal bills time at \$2,465 an hour. Want to hire famous litigator David Boies? That'll cost \$1,950 an hour (at least). Reuters was first to report their fees.

Eye-watering rates are nothing new for Big Law firms, which typically ask clients to pay higher prices at least once a year, regardless of broader market conditions.

"Value is in the eye of the beholder," said John O'Connor, a San Francisco-based expert on legal fees. "The perceived value of a good lawyer can reach into the multi-billions of dollars."

Kirkland & Ellis declined to comment on its billing rates. None of the other firms responded to requests to comment.

Charge It Up

Big Law firms are crossing the \$2,000-an-hour threshold after two years of surging rates driven by an increase in demand for lawyers.

Firm	Highest Billing Rate
Hogan Lovells	\$2,465
Latham & Watkins	\$2,075
Kirkland & Ellis	\$1,995
Simpson Thacher & Bartlett	\$1,965
Boies Schiller Flexner	\$1,950
Sidley Austin	\$1,900

Source: Court documents

Bloomberg Law

Law firms have been more successful raising rates than most other businesses over the past 15 years.

Law firm rates rose by roughly 40 percent from 2007 to 2020, or just short of 3 percent per year, Thomson Reuters Peer Monitor data show. US inflation rose by about 28% during that time.

The 100 largest law firms in the past two years achieved their largest rate increases in more than a decade, Peer Monitor says. The rates surged more than 6% in 2020 and grew another 5.6% through November of last year. Neither level had been breached since 2008.

The price hikes occurred during a once-in-a-decade surge in demand for law services, which propelled profits at firms to new levels. Fourteen law firms reported average profits per equity partner in 2021 over \$5 million, according to data from The American Lawyer. That was up from six the previous year.

The highest-performing firms, where lawyers charge the highest prices, have outperformed their smaller peers. Firms with leading practices in markets such as mergers and acquisitions, capital markets, and real estate were forced to turn away work at some points during the pandemic-fueled surge.

Firms receive relatively tepid pushback from their giant corporate clients, especially when advising on bet-the-company litigation or billion-dollar deals.

The portion of bills law firms collected—a sign of how willingly clients pay full-freight—rose during the previous two years after drifting lower following the Great Financial Crisis. Collection rates last year breached 90% for the first time since 2009, Peer Monitor data show.

Professional rules prohibit lawyers from charging “unconscionable” or “unreasonable” rates. But that doesn’t preclude clients from paying any price they perceive as valuable, said Jacqueline Vinaccia, a San Diego-based lawyer who testifies on lawyer fee disputes.

Lawyers’ fees are usually only contested when they will be paid by a third party.

That happened recently with Hogan Lovells’ Katyal, whose nearly \$2,500 an hour fee was contested in May by a US trustee overseeing a bankruptcy case involving a Johnson & Johnson unit facing claims its talc-based powders caused cancer.

The trustee, who protects the financial interests of bankruptcy estates, argued Katyal’s fee was more than \$1,000 an hour higher than rates charged by lawyers in the same case at Jones Day and Skadden Arps Slate Meagher & Flom.

A hearing on the trustee’s objection is scheduled for next week. Hogan Lovells did not respond to a request for comment on the objection.

Vinaccia said the firm’s options will be to reduce its fee, withdraw from the case, or argue the levy is reasonable, most likely based on Katyal’s extensive experience arguing appeals.

Still, the hourly rate shows just how valuable the most prestigious lawyers’ time can be—even compared to their highly compensated competitors.

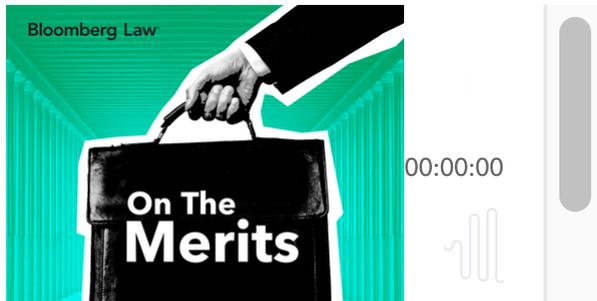
“If the argument is that Jones Day and Skadden Arps are less expensive, then you’re already talking about the cream of the crop, the top-of-the-barrel law firms,” Vinaccia said. “I can’t imagine a case in which I might argue those two firms are more reasonable than the rates I’m dealing with.”

Worth Your Time

On Cravath: Cravath Swaine & Moore is heading to Washington, opening its first new office since 1973 by hiring former heads of the U.S. Securities and Exchange Commission and Federal Deposit Insurance Corporation. Meghan Tribe reports the move comes as Big Law firms are looking to add federal government expertise as clients face more regulatory scrutiny.

On Big Law Promotions: It’s rare that associates get promotions to partner in June, but Camille Vasquez is now a Brown Rudnick partner after she shot to fame representing Johnny Depp in his defamation trial against ex-wife Amber Heard.

On Working From Home: I spoke this week with Quinn Emanuel’s John Quinn about why he thinks law firm life is never going back to the office-first culture that was upset by the pandemic. Listen to the podcast [here](#).



That's it for this week! Thanks for reading and please send me your thoughts, critiques, and tips.

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To contact the editors responsible for this story: Chris Opfer at copfer@bloomberglaw.com; John Hughes at jhughes@bloombergindustry.com

Documents

[Trustee's Objection](#)

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[Overworked Big Law Can't Find Enough Lawyers With Demand Surging](#) Dec. 9, 2021, 3:00 AM

[Never Underestimate Big Law's Ability to Raise Billing Rates](#) Aug. 12, 2021, 3:00 AM

Law Firms

Simpson Thacher
Hogan Lovells
Jones Day
Skadden
Sidley Austin
Quinn Emanuel
Cravath Swaine & Moore
Latham & Watkins
Kirkland & Ellis
Boies Schiller Flexner

Topics

expert fees
compensation of bankruptcy attorney
acquisitions
U.S. trustees
financial markets
client-paid legal fees
data breaches

Companies

Johnson & Johnson
Thomson Reuters Corp

Exhibit 3

CONFIDENTIAL and WORK PRODUCT - JUSTIN MARQUEZ TIMESHEETS

Date:	Hours:	Description	Case	Atty	Case total:
1/26/2018	0.2	Call with Irma Frausto re case.	Bank of America	JM	0.2
2/7/2018	0.2	Confer with Kane Moon ("KM")	Bank of America	JM	0.4
2/7/2018	1.5	Review records produced by B of A	Bank of America	JM	1.9
2/8/2018	1	Call client to discuss case	Bank of America	JM	2.9
2/8/2018	2	Review records	Bank of America	JM	4.9
2/9/2018	3	Draft complaint	Bank of America	JM	7.9
2/10/2018	0.2	E-mail client re complaint	Bank of America	JM	8.1
2/10/2018	0.2	E-mail KM re complaint	Bank of America	JM	8.3
2/10/2018	2	Draft complaint	Bank of America	JM	10.3
2/12/2018	0.2	Confer with KM re case	Bank of America	JM	10.5
2/14/2018	1.5	Draft PAGA letter; submit online	Bank of America	JM	12.0
2/14/2018	0.5	Finalize complaint and related documents	Bank of America	JM	12.5
2/22/2018	0.1	Confer with KM re filing complaint	Bank of America	JM	12.6
3/12/2018	0.1	Read and respond to e-mail from client re case	Bank of America	JM	12.7
3/30/2018	2.5	Review removal papers, meet and confer letter re motion to dismiss	Bank of America	JM	15.2
4/2/2018	0.5	Prepare and file notice of interested parties and consent to magistrate	Bank of America	JM	15.7
4/2/2018	1.5	Research whether to consent to magistrate's jurisdiction	Bank of America	JM	17.2
4/2/2018	0.5	Review Local Rules re initial appearance requirements	Bank of America	JM	17.7
4/2/2018	0.2	Review stipulation; e-mail opposing counsel ("OC") re same.	Bank of America	JM	17.9
4/2/2018	0.8	Confer with KM re removal and related cases	Bank of America	JM	18.7
4/2/2018	2.5	Research re related cases	Bank of America	JM	21.2
4/16/2018	0.2	Confer with KM re case	Bank of America	JM	21.4
4/16/2018	1.5	Review payroll records produced by defendant; calculate damages for OT claim	Bank of America	JM	22.9
4/16/2018	0.2	Confer with KM re case	Bank of America	JM	23.1
4/16/2018	1	Review motions to dismiss and pleadings filed in related cases	Bank of America	JM	24.1
4/16/2018	0.1	E-mail OC re documents	Bank of America	JM	24.2
4/17/2018	0.1	E-mail client re first amended complaint	Bank of America	JM	24.3
4/17/2018	4.5	Draft first amended complaint	Bank of America	JM	28.8
4/17/2018	1	Research federal pleading standards.	Bank of America	JM	29.8
4/18/2018	0.2	E-mail OC re FAC	Bank of America	JM	30.0
4/18/2018	0.5	Revise FAC	Bank of America	JM	30.5
4/18/2018	0.1	E-mail OC	Bank of America	JM	30.6
4/18/2018	0.3	Conference call with client re FAC	Bank of America	JM	30.9
4/18/2018	0.5	Review records to prepare for conference call.	Bank of America	JM	31.4
4/19/2018	0.3	Review stipulation; e-mail OC re same.	Bank of America	JM	31.7
4/19/2018	0.5	Research re mot. to dismiss and amending complaint.	Bank of America	JM	32.2
4/26/2018	0.2	Review stipulation; e-mail OC re same.	Bank of America	JM	32.4
4/26/2018	0.1	Confer with KM re conference call.	Bank of America	JM	32.5
4/26/2018	0.2	Conference call with OC re motion to dismiss.	Bank of America	JM	32.7
4/26/2018	1	Legal research and review file to prepare for meet and confer.	Bank of America	JM	33.7
4/26/2018	0.1	Read and respond to e-mail from OC	Bank of America	JM	33.8
4/26/2018	0.1	Confer with KM re case.	Bank of America	JM	33.9
4/26/2018	0.5	Research Alsup and 12(b)(6) motions/Landers	Bank of America	JM	34.4
4/26/2018	0.1	Read and respond to e-mail from OC re conference call.	Bank of America	JM	34.5
5/3/2018	0.2	Review order re class action settlements	Bank of America	JM	34.7
5/8/2018	0.1	E-mails with OC re conference call/mot. to dismiss.	Bank of America	JM	34.8
5/8/2018	0.4	Review documents produced by defendant re bonus program	Bank of America	JM	35.2
5/9/2018	0.4	Conference call with OC	Bank of America	JM	35.6
5/9/2018	1.5	Review and research claims to prepare for conference call with OC.	Bank of America	JM	37.1
5/16/2018	1.8	Review file and analyze potential claims; memo re same	Bank of America	JM	38.9
5/17/2018	0.5	Call with Irma Frausto re global recognition bonus program.	Bank of America	JM	39.4
5/17/2018	0.2	Call with potential witness to age discrimination, Priscilla Estrada.	Bank of America	JM	39.6
5/17/2018	0.1	E-mail client re bonus program	Bank of America	JM	39.7
5/17/2018	1	Conference call with client re claims	Bank of America	JM	40.7
5/17/2018	0.7	Review client's file to prepare for conference call.	Bank of America	JM	41.4
5/18/2018	0.1	E-mail OC re communication from Bank of America	Bank of America	JM	41.5
6/4/2018	0.2	E-mail OC re stipulation to continue Initial Case Management Conference.	Bank of America	JM	41.7
6/4/2018	0.5	Read and respond to e-mail from OC re motion to dismiss	Bank of America	JM	42.2

6/4/2018	1	Revise first amended complaint.	Bank of America	JM	43.2
6/7/2018	0.2	Review order re stipulation and calendar dates	Bank of America	JM	43.4
6/8/2018	0.5	Revise FAC; finalize and serve electronically	Bank of America	JM	43.9
6/11/2018	0.2	Confer with Allen Feghali ("AF") and KM re case strategy	Bank of America	JM	44.1
6/15/2018	0.2	Submit complaint to DIR	Bank of America	JM	44.3
6/15/2018	0.2	E-mail DIR re PAGA	Bank of America	JM	44.5
6/27/2018	5	Research re motion to dismiss claim for injunctive relief	Bank of America	JM	49.5
6/28/2018	1.5	Review motion to relate cases; research re same.	Bank of America	JM	51.0
7/4/2018	12	Research and draft opposition to motion to dismiss.	Bank of America	JM	63.0
7/5/2018	0.2	E-mails with OC re ADR certification	Bank of America	JM	63.2
7/5/2018	0.3	Review and revise initial disclosures	Bank of America	JM	63.5
7/5/2018	0.2	Confer with client re ADR certification.	Bank of America	JM	63.7
7/5/2018	4	Revise opposition to motion to dismiss; prepare RFJN; finalize and file electronically	Bank of America	JM	67.7
7/6/2018	0.5	Conference call re case status	Bank of America	JM	68.2
7/10/2018	0.3	Draft amended certification.	Bank of America	JM	68.5
7/10/2018	6	Draft Rule 26(f) report	Bank of America	JM	74.5
8/3/2018	0.1	Read and respond to e-mail from OC re conference call.	Bank of America	JM	74.6
8/3/2018	0.2	Confer with KM re order on motion to dismiss	Bank of America	JM	74.8
8/23/2018	0.2	Call with client re case	Bank of America	JM	75.0
9/5/2018	0.3	Review OC's changes to CMC statement.	Bank of America	JM	75.3
9/17/2018	2.5	Draft discovery	Bank of America	JM	77.8
9/17/2018	2	Revise CMC statement; e-mail OC re same.	Bank of America	JM	79.8
9/20/2018	0.2	Finalize CMC statement and file electronically	Bank of America	JM	80.0
9/20/2018	0.3	Review defendant's edits to CMC statement; e-mail OC re same	Bank of America	JM	80.3
9/20/2018	0.1	E-mail OC re joint statement.	Bank of America	JM	80.4
9/24/2018	0.3	Review docket entry from court; research court's standing order; call court re calendar	Bank of America	JM	80.7
9/26/2018	0.2	Confer with AF re discovery responses	Bank of America	JM	80.9
9/27/2018	9	Travel to San Francisco for CMC	Bank of America	JM	89.9
9/28/2018	0.1	E-mail OC re defendant's failure to provide initial disclosures	Bank of America	JM	90.0
9/28/2018	0.2	Research re initial disclosures	Bank of America	JM	90.2
10/4/2018	0.1	Confer with AF re discovery responses	Bank of America	JM	90.3
10/4/2018	3.5	Revise discovery responses	Bank of America	JM	93.8
10/4/2018	0.2	Review scheduling order and calendar dates.	Bank of America	JM	94.0
10/8/2018	0.2	Confer with AF re discovery responses	Bank of America	JM	94.2
10/8/2018	2	Review document production and make redactions	Bank of America	JM	96.2
10/15/2018	0.1	Read and respond to e-mail from OC re discovery deadlines.	Bank of America	JM	96.3
10/31/2018	0.2	Read and respond to e-mail from OC re discovery.	Bank of America	JM	96.5
11/6/2018	0.2	Review defendant's revisions to joint report and e-mail OC re same.	Bank of America	JM	96.7
11/15/2018	0.1	E-mail AF research	Bank of America	JM	96.8
11/15/2018	0.1	Confer with AF re discovery responses	Bank of America	JM	96.9
11/15/2018	0.8	Research Judge Beeler's discovery rulings	Bank of America	JM	97.7
11/15/2018	0.5	Review discovery responses	Bank of America	JM	98.2
11/15/2018	1.5	Further status conference	Bank of America	JM	99.7
11/16/2018	0.8	Review and revise draft protective order; e-mail OC re same.	Bank of America	JM	100.5
11/27/2018	0.2	Review stipulated protective order; e-mail OC re same.	Bank of America	JM	100.7
12/17/2018	5.3	Revise meet and confer letter re: defendant's discovery responses	Bank of America	JM	106.0
12/18/2018	4.3	Revise meet and confer letter re: defendant's discovery responses.	Bank of America	JM	110.3
12/19/2018	6.7	Revise meet and confer letter re: def.'s discovery requests; e-mail AF re same.	Bank of America	JM	117.0
12/28/2018	0.1	E-mail AF re meet and confer letter.	Bank of America	JM	117.1
01/25/19	0.5	Confer with Thiago Coelho ("TC") and Bobby Saadian ("BS") re case status and strategy	Bank of America	JM	117.6
01/25/19	0.2	Confer with Irma Frausto re transition	Bank of America	JM	117.8
01/25/19	1.7	Review OC's meet and confer letter re discovery; prepare memo re same.	Bank of America	JM	119.5
01/28/19	0.5	Review file to prepare for transition	Bank of America	JM	120.0
01/30/19	0.2	E-mail OC re case transition.	Bank of America	JM	120.2
02/01/19	0.3	Notice of substitution of counsel	Bank of America	JM	120.5
02/07/19	0.3	E-mail OC re mediation and discovery	Bank of America	JM	120.8
02/14/19	0.5	E-mails with counsel for related case.	Bank of America	JM	121.3
02/19/19	0.2	Follow up e-mail to OC re mediation and discovery	Bank of America	JM	121.5
02/19/19	0.1	Read and respond to e-mail from OC re mediation and discovery.	Bank of America	JM	121.6
02/20/19	0.1	Read and respond to e-mail from OC re mediation and discovery.	Bank of America	JM	121.7

02/25/19	0.3	Call with OC re discovery and mediation.	Bank of America	JM	122.0
02/25/19	0.2	E-mail expert re case retention.	Bank of America	JM	122.2
02/25/19	0.2	Call with expert re case retention.	Bank of America	JM	122.4
02/26/19	0.5	E-mail expert re data	Bank of America	JM	122.9
03/04/19	0.4	E-mail OC re discovery and mediation.	Bank of America	JM	123.3
03/05/19	0.1	Read and respond to e-mail from OC re mediation and discovery.	Bank of America	JM	123.4
03/05/19	0.2	Call with OC re discovery and mediation.	Bank of America	JM	123.6
03/05/19	0.1	E-mail OC memorializing call	Bank of America	JM	123.7
03/06/19	0.1	Read and respond to e-mail from OC re mediation and discovery.	Bank of America	JM	123.8
03/06/19	0.8	E-mails with TC and Nicol Hajjar ("NH") re mediation.	Bank of America	JM	124.6
03/06/19	0.2	Draft CMC statement; e-mail OC re same.	Bank of America	JM	124.8
03/06/19	0.3	Prepare Belaire-West notice; e-mail TC and NH re same.	Bank of America	JM	125.1
03/06/19	0.5	Meet with TC and NH to discuss strategy re mediation	Bank of America	JM	125.6
03/06/19	0.2	E-mail O re Belaire-West notice.	Bank of America	JM	125.8
03/07/19	0.3	E-mails with OC re mediation.	Bank of America	JM	126.1
03/08/19	0.2	E-mails with OC re mediation.	Bank of America	JM	126.3
03/08/19	6.6	Prepare memo re mediation strategy.	Bank of America	JM	132.9
03/11/19	4.2	Continue preparing memo re mediation strategy.	Bank of America	JM	137.1
03/11/19	2.0	Meet with TC and NH to discuss strategy re mediation	Bank of America	JM	139.1
03/12/19	1.8	Draft letter to OC re mediation data.	Bank of America	JM	140.9
03/12/19	0.3	Discuss letter to OC re mediation data with TC and NH	Bank of America	JM	141.2
03/12/19	0.2	E-mails with TC and NH re mediation data.	Bank of America	JM	141.4
03/12/19	1.5	Research re Duran and survey evidence.	Bank of America	JM	142.9
03/12/19	0.3	E-mail associate re instructions on survey evidence memo	Bank of America	JM	143.2
03/13/19	0.5	E-mail expert re data.	Bank of America	JM	143.7
03/13/19	0.2	E-mail OC re mediation data.	Bank of America	JM	143.9
03/13/19	1.0	Review file to prepare for CMC.	Bank of America	JM	144.9
03/14/19	3.5	Travel to attend CMC in San Francisco.	Bank of America	JM	148.4
03/14/19	0.8	CMC.	Bank of America	JM	149.2
03/14/19	3.7	Travel back from CMC.	Bank of America	JM	152.9
03/15/19	5.0	Research and preparation for mediation.	Bank of America	JM	157.9
03/15/19	1.0	Meet with TC and NH to discuss strategy re mediation	Bank of America	JM	158.9
03/18/19	0.2	Read and respond to e-mail from OC re mediation and discovery.	Bank of America	JM	159.1
03/18/19	4.8	Draft questionnaire re Belaire-West respondents.	Bank of America	JM	163.9
03/19/19	0.3	E-mails re questionnaire.	Bank of America	JM	164.2
03/19/19	0.5	Revisions to questionnaire.	Bank of America	JM	164.7
03/20/19	0.5	Conference call with OC re mediation.	Bank of America	JM	165.2
03/20/19	1.0	Meeting with intake department re questionnaire.	Bank of America	JM	166.2
03/21/19	0.8	E-mails re conference call with OC.	Bank of America	JM	167.0
03/21/19	2.3	Further revisions to questionnaire.	Bank of America	JM	169.3
03/22/19	0.4	E-mails re mediation.	Bank of America	JM	169.7
03/22/19	0.7	Read memo from associate re survey evidence.	Bank of America	JM	170.4
03/22/19	0.3	Instructions to associate re additional research for memo	Bank of America	JM	170.7
03/24/19	0.5	Meet with intake department to discuss questionnaire.	Bank of America	JM	171.2
03/25/19	0.7	E-mails to intake department re questionnaire.	Bank of America	JM	171.9
03/25/19	1.0	Meet with TC and RD to discuss class member declaration template	Bank of America	JM	172.9
03/28/19	1.3	Meet with TC and Robert Dart ("RD") to discuss case	Bank of America	JM	174.2
03/28/19	0.5	Prepare and e-mail RD memo re case and topics for research.	Bank of America	JM	174.7
03/28/19	6.0	Draft memo re mediation strategy.	Bank of America	JM	180.7
03/29/19	2.5	Finalize memo re mediation strategy and circulate to the team.	Bank of America	JM	183.2
03/29/19	3.0	Meet with TC, NH, and RD re case strategy.	Bank of America	JM	186.2
03/29/19	0.5	Call with survey expert to discuss retention.	Bank of America	JM	186.7
03/31/19	2.2	Draft memo to survey expert re scope of work; e-mail expert re same.	Bank of America	JM	188.9
03/31/19	0.6	Call with questionnaire respondent; e-mail staff re same.	Bank of America	JM	189.5
04/01/19	0.5	Meet with TC and NH to discuss strategy re conference call with OC	Bank of America	JM	190.0
04/01/19	0.3	Conference call with OC re mediation.	Bank of America	JM	190.3
04/01/19	0.8	Revise questionnaire; e-mail marketing re same.	Bank of America	JM	191.1
04/01/19	1.5	Meet with TC and RD to discuss class member declaration template	Bank of America	JM	192.6
04/01/19	1.0	Review and revise class member declaration template.	Bank of America	JM	193.6
04/02/19	0.5	Review questionnaire leads and e-mails re same.	Bank of America	JM	194.1
04/02/19	0.3	E-mails with BS re potential declarant.	Bank of America	JM	194.4
04/02/19	0.2	E-mails with TC and NH re questionnaire leads.	Bank of America	JM	194.6
04/02/19	0.5	Meet with TC, NH, and RD re case strategy.	Bank of America	JM	195.1
04/02/19	0.8	Review and revise class member declaration.	Bank of America	JM	195.9

04/02/19	0.6	Call with questionnaire respondent; e-mail staff re same.	Bank of America	JM	196.5
04/02/19	0.4	Review and revise class member declaration.	Bank of America	JM	196.9
04/03/19	1.5	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	198.4
04/03/19	1.2	E-mails re questionnaire leads.	Bank of America	JM	199.6
04/03/19	0.3	E-mails with RD re Frausto's declaration.	Bank of America	JM	199.9
04/04/19	1.6	E-mails re questionnaire leads.	Bank of America	JM	201.5
04/04/19	1.0	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	202.5
04/04/19	3.8	Review and revise class member declarations.	Bank of America	JM	206.3
04/05/19	1.0	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	207.3
04/05/19	2.6	Review and revise class member declarations.	Bank of America	JM	209.9
04/06/19	0.3	E-mail survey expert.	Bank of America	JM	210.2
04/06/19	0.4	E-mail re contract attorneys.	Bank of America	JM	210.6
04/08/19	1.0	Confer with TC and Patty Chen ("PC") re case.	Bank of America	JM	211.6
04/08/19	0.5	E-mail PC case memo	Bank of America	JM	212.1
04/08/19	1.0	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	213.1
04/08/19	0.3	E-mail contract attorneys leads list.	Bank of America	JM	213.4
04/08/19	0.8	E-mails with contract attorneys re leads.	Bank of America	JM	214.2
04/08/19	0.5	Confer with contract attorney re progress.	Bank of America	JM	214.7
04/08/19	0.7	E-mail PC re memo on survey evidence.	Bank of America	JM	215.4
04/08/19	0.2	E-mail OC re mediation data.	Bank of America	JM	215.6
04/09/19	0.6	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	216.2
04/09/19	2.3	Meet with TC, NH, and RD re mediation brief.	Bank of America	JM	218.5
04/09/19	0.7	E-mails with contract attorneys re leads.	Bank of America	JM	219.2
04/09/19	0.5	E-mail OC re Belaire-West list.	Bank of America	JM	219.7
04/09/19	0.3	Call with Frausto re declaration.	Bank of America	JM	220.0
04/09/19	0.2	E-mail RD re Frausto's declaration.	Bank of America	JM	220.2
04/09/19	3.8	Research re scope of class definition; e-mail TC, NH, RD, and PC re same.	Bank of America	JM	224.0
04/10/19	0.6	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	224.6
04/10/19	0.3	E-mail team re survey research.	Bank of America	JM	224.9
04/10/19	0.5	E-mail team re revisions to declaration template.	Bank of America	JM	225.4
04/10/19	0.2	E-mail PC re survey research.	Bank of America	JM	225.6
04/10/19	0.2	E-mail OC re mediation data.	Bank of America	JM	225.8
04/10/19	0.1	E-mail survey expert.	Bank of America	JM	225.9
04/10/19	0.5	Conference call with survey expert.	Bank of America	JM	226.4
04/10/19	2.8	Revise declaration template and e-mail contract attorneys re same.	Bank of America	JM	229.2
04/11/19	0.4	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	229.6
04/11/19	1.0	E-mails with contract attorneys re leads.	Bank of America	JM	230.6
04/11/19	0.2	E-mail OC re mediation data.	Bank of America	JM	230.8
04/11/19	6.0	Draft mediation brief.	Bank of America	JM	236.8
04/12/19	0.5	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	237.3
04/12/19	0.7	E-mails with contract attorneys re leads.	Bank of America	JM	238.0
04/12/19	3.5	Review and revise class member declarations.	Bank of America	JM	241.5
04/12/19	4.8	Draft mediation brief.	Bank of America	JM	246.3
04/12/19	0.5	Meet with team to discuss case strategy.	Bank of America	JM	246.8
04/13/19	5.0	E-mails with contract attorneys re draft declarations.	Bank of America	JM	251.8
04/13/19	1.3	E-mails with contract attorneys re leads.	Bank of America	JM	253.1
04/14/19	0.4	E-mails with contract attorneys re leads.	Bank of America	JM	253.5
04/14/19	7.0	Draft mediation brief.	Bank of America	JM	260.5
04/15/19	0.2	E-mail survey expert.	Bank of America	JM	260.7
04/15/19	0.3	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	261.0
04/15/19	0.5	Meet with team to discuss mediation brief.	Bank of America	JM	261.5
04/15/19	0.3	E-mail contract attorneys re leads	Bank of America	JM	261.8
04/15/19	0.2	E-mail TC and RD re declaration cites.	Bank of America	JM	262.0
04/15/19	1.8	Research re regular rate claim; e-mail TC and RD re same.	Bank of America	JM	263.8
04/15/19	0.3	Read and respond to e-mail from OC re mediation and discovery.	Bank of America	JM	264.1
04/15/19	4.2	Draft mediation brief.	Bank of America	JM	268.3
04/15/19	1.3	Review survey expert's report and e-mail team initial thoughts.	Bank of America	JM	269.6
04/15/19	0.8	E-mail survey expert proposed edits.	Bank of America	JM	270.4
04/16/19	2.0	Finalize initial draft of mediation brief and e-mail team.	Bank of America	JM	272.4
04/16/19	0.5	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	JM	272.9
04/16/19	0.6	Review Frausto's declarations and e-mail RD edits.	Bank of America	JM	273.5
04/16/19	3.4	Revise mediation brief.	Bank of America	JM	276.9
04/16/19	0.5	Research re declarations; e-mail team re same.	Bank of America	JM	277.4
04/16/19	0.3	Call with class member re declaration.	Bank of America	JM	277.7

04/16/19	2.5	Continue reviewing expert report for typos and e-mail expert re same.	Bank of America	JM	280.2
04/16/19	0.5	E-mails with PC re declarations.	Bank of America	JM	280.7
04/16/19	0.8	Additional edits to mediation brief.	Bank of America	JM	281.5
04/16/19	1.0	Review and finalize mediation brief.	Bank of America	JM	282.5
04/16/19	0.2	E-mail BS re mediation brief.	Bank of America	JM	282.7
04/17/19	0.3	Instructions to paralegal re paper copies of mediation brief.	Bank of America	JM	283.0
04/17/19	0.6	E-mails with OC re mediation.	Bank of America	JM	283.6
04/18/19	0.2	E-mails with mediator's office.	Bank of America	JM	283.8
04/19/19	0.8	Conference call with mediator to discuss brief.	Bank of America	JM	284.6
04/19/19	1.0	Review motion to intervene.	Bank of America	JM	285.6
04/19/19	3.5	Research re motion to intervene.	Bank of America	JM	289.1
04/20/19	2.4	Review and revise class member declarations.	Bank of America	JM	291.5
04/21/19	3.5	Travel to San Jose for mediation.	Bank of America	JM	295.0
04/21/19	5.0	Prepare for mediation, including meetings with TC and NH.	Bank of America	JM	300.0
04/22/19	6.8	Mediation with Judge Sabraw	Bank of America	JM	306.8
04/22/19	3.7	Return to LA from mediation.	Bank of America	JM	310.5
04/23/19	0.2	E-mail OC re mediation.	Bank of America	JM	310.7
04/23/19	5.7	Research re motion to intervene.	Bank of America	JM	316.4
04/24/19	0.8	Prepare instructions to PC re opposition to motion to intervene.	Bank of America	JM	317.2
04/25/29	1.3	E-mails with opposition to motion to intervene.	Bank of America	JM	318.5
04/26/19	0.2	Read and respond to e-mail from mediator.	Bank of America	JM	318.7
04/26/19	0.3	E-mail PC re leads	Bank of America	JM	319.0
04/30/19	0.2	E-mail mediator.	Bank of America	JM	319.2
05/01/19	1.0	Call with Frausto re deposition.	Bank of America	JM	320.2
05/02/19	0.6	E-mails re motion to intervene.	Bank of America	JM	320.8
05/02/19	0.1	E-mail OC re deposition and motion to intervene.	Bank of America	JM	320.9
05/02/19	0.1	Read and respond to OC's email re deposition and motion to intervene.	Bank of America	JM	321.0
05/02/19	0.6	E-mail PC re opposition to motion to intervene.	Bank of America	JM	321.6
05/02/19	7.5	Revise opposition to motion to intervene.	Bank of America	JM	329.1
05/03/19	2.8	Review and finalize opposition to motion to intervene.	Bank of America	JM	331.9
05/03/19	4.5	Conference call with Frausto re deposition	Bank of America	JM	336.4
05/04/19	0.3	E-mail Frausto re documents to review.	Bank of America	JM	336.7
05/06/19	3.0	Fly to San Francisco for Plaintiff's deposition.	Bank of America	JM	339.7
05/07/19	7.3	Defend Plaintiff's deposition.	Bank of America	JM	347.0
05/07/19	3.0	Fly back to LA from Plaintiff's deposition.	Bank of America	JM	350.0
05/08/19	0.5	Finalize joint case management statement.	Bank of America	JM	350.5
05/10/19	0.6	Review reply re motion to intervene; e-mail RD and PC re same.	Bank of America	JM	351.1
05/10/19	0.3	Confer with RD and PC re motion to intervene.	Bank of America	JM	351.4
05/14/19	0.8	E-mails re motion to intervene.	Bank of America	JM	352.2
05/16/19	3.0	Fly to San Francisco for CMC	Bank of America	JM	355.2
05/16/19	3.3	Attend CMC (includes prep and time waiting in court to be called).	Bank of America	JM	358.5
05/16/19	3.5	Return flight to Los Angeles.	Bank of America	JM	362.0
05/16/19	0.3	E-mails re CMC.	Bank of America	JM	362.3
05/20/19	0.5	Call with counsel in related case.	Bank of America	JM	362.8
05/20/19	0.3	E-mails re call with counsel in related case.	Bank of America	JM	363.1
05/20/19	0.2	E-mails re call with counsel in intervenor's case.	Bank of America	JM	363.3
05/21/19	0.1	E-mails re call with counsel in intervenor's case.	Bank of America	JM	363.4
05/21/19	3.7	Draft letter to OC re related case; finalize and e-mail to OC.	Bank of America	JM	367.1
05/22/19	0.3	Call with intervenor's counsel.	Bank of America	JM	367.4
05/24/19	0.3	Call with mediator re case	Bank of America	JM	367.7
05/29/19	0.3	E-mails with counsel for related case.	Bank of America	JM	368.0
05/29/19	0.2	Read and respond to e-mail re supplemental discovery responses.	Bank of America	JM	368.2
05/30/19	0.4	Call with counsel in related case.	Bank of America	JM	368.6
05/31/19	0.3	Call with counsel in related case.	Bank of America	JM	368.9
05/31/19	0.5	Call with expert	Bank of America	JM	369.4
06/03/19	7.1	Draft motion for class certification.	Bank of America	JM	376.5
06/03/19	0.6	E-mails re motion for class certification.	Bank of America	JM	377.1
06/03/19	0.5	Meeting re motion for class certification.	Bank of America	JM	377.6
06/04/19	0.8	Review expert's report; e-mail expert re same.	Bank of America	JM	378.4
06/04/19	0.5	E-mails with counsel for related case.	Bank of America	JM	378.9
06/04/19	6.8	Draft motion for class certification and related documents	Bank of America	JM	385.7
06/04/19	1.4	E-mails re motion for class certification.	Bank of America	JM	387.1
06/05/19	8.7	Draft motion for class certification and related documents	Bank of America	JM	395.8
06/05/19	0.8	E-mails re motion for class certification.	Bank of America	JM	396.6

06/06/19	0.7	Review expert's report; e-mail expert re same.	Bank of America	JM	397.3
06/06/19	0.4	E-mails with expert re report.	Bank of America	JM	397.7
06/06/19	0.3	Call with co-counsel re mediation.	Bank of America	JM	398.0
06/06/19	10.2	Draft motion for class certification and related documents	Bank of America	JM	408.2
06/07/19	9.5	Draft motion for class certification and related documents	Bank of America	JM	417.7
06/08/19	0.2	E-mail co-counsel re motion for class certification.	Bank of America	JM	417.9
06/10/19	0.3	E-mail co-counsel re motion for class certification.	Bank of America	JM	418.2
06/10/19	0.7	Meeting to discuss motion for class certification.	Bank of America	JM	418.9
06/10/19	3.6	Revise supporting documents re motion for class certification.	Bank of America	JM	422.5
06/10/19	0.5	Review expert's report; e-mail expert re same.	Bank of America	JM	423.0
06/10/19	1.3	Review edits to draft of motion for class certification.	Bank of America	JM	424.3
06/10/19	0.2	E-mail co-counsel re motion for class certification.	Bank of America	JM	424.5
06/11/19	0.7	Review expert's report; e-mail expert re same.	Bank of America	JM	425.2
06/11/19	0.3	E-mail survey expert re report.	Bank of America	JM	425.5
06/11/19	4.6	Revise motion for class certification.	Bank of America	JM	430.1
06/12/19	7.7	Revise motion for class certification.	Bank of America	JM	437.8
06/12/19	0.2	E-mails with expert re report.	Bank of America	JM	438.0
06/12/19	0.6	Review co-counsel's edits to motion for class certification.	Bank of America	JM	438.6
06/13/19	0.8	Review and revise motion to shorten time.	Bank of America	JM	439.4
06/13/19	9.0	Revise motion for class certification.	Bank of America	JM	448.4
06/14/19	0.2	E-mail co-counsel re motion for class certification.	Bank of America	JM	448.6
06/14/19	6.5	Finalize motion for class certification and related documents.	Bank of America	JM	455.1
06/17/19	0.5	Call with counsel in related case.	Bank of America	JM	455.6
06/17/19	1.2	Read and respond to e-mails re motion for class certification filing.	Bank of America	JM	456.8
06/18/19	0.3	Meeting to discuss strategy going forward.	Bank of America	JM	457.1
06/19/19	0.4	Meeting to discuss strategy going forward.	Bank of America	JM	457.5
06/21/19	0.5	Review and finalize administrative motion.	Bank of America	JM	458.0
07/05/19	0.3	E-mails re mediation.	Bank of America	JM	458.3
07/05/19	0.2	Call with counsel in related case.	Bank of America	JM	458.5
07/08/19	0.2	E-mails with counsel in related case.	Bank of America	JM	458.7
07/09/19	0.2	E-mails with OC re CMC statement.	Bank of America	JM	458.9
07/09/19	0.4	Draft CMC statement; e-mail OC re same.	Bank of America	JM	459.3
07/11/19	0.3	Review edits to CMC statement; e-mail OC re same.	Bank of America	JM	459.6
07/14/19	0.5	Read and respond to e-mail from expert re second mediation.	Bank of America	JM	460.1
07/17/19	3.0	Fly to SF for CMC	Bank of America	JM	463.1
07/17/19	1.0	Review file to prepare for CMC.	Bank of America	JM	464.1
07/17/19	0.6	Review order denying motion for class certification in Castillo; e-mail team re same.	Bank of America	JM	464.7
07/17/19	0.3	E-mails with counsel in related case.	Bank of America	JM	465.0
07/18/19	0.8	Attend CMC (includes prep and time waiting in court to be called).	Bank of America	JM	465.8
07/18/19	2.5	Return flight to Los Angeles.	Bank of America	JM	468.3
07/18/19	0.5	Conference call with counsel in related case.	Bank of America	JM	468.8
07/18/19	1.0	Strategy meeting to discuss second mediation.	Bank of America	JM	469.8
07/19/19	0.3	E-mails re second mediation.	Bank of America	JM	470.1
07/19/19	7.5	Draft second mediation brief.	Bank of America	JM	477.6
07/20/19	6.4	Finalize second mediation brief and circulate to team.	Bank of America	JM	484.0
07/22/19	0.3	E-mails with counsel in related case.	Bank of America	JM	484.3
07/22/19	0.2	Conference call with counsel in related case.	Bank of America	JM	484.5
07/22/19	0.6	E-mails re second mediation brief.	Bank of America	JM	485.1
07/22/19	5.3	Review edits to second mediation brief and continue to revise brief.	Bank of America	JM	490.4
07/23/19	4.0	Research pending cases and past settlements and draft memo re same.	Bank of America	JM	494.4
07/23/19	0.3	E-mail counsel in related cases.	Bank of America	JM	494.7
07/23/19	1.5	Review and finalize mediation brief; e-mail mediator re same.	Bank of America	JM	496.2
07/24/19	0.3	E-mails with OC re discovery.	Bank of America	JM	496.5
07/25/19	0.5	E-mails with OC re discovery.	Bank of America	JM	497.0
07/26/19	0.3	E-mails with OC re discovery.	Bank of America	JM	497.3
07/26/19	0.2	E-mails re mediation.	Bank of America	JM	497.5
07/26/19	1.0	Review MSJ	Bank of America	JM	498.5
07/26/19	0.6	Meeting to discuss MSJ	Bank of America	JM	499.1
07/29/19	0.5	Call with mediator re case	Bank of America	JM	499.6
07/29/19	2.8	Travel to SF for mediation.	Bank of America	JM	502.4
07/29/19	0.4	Meeting to discuss MSJ opposition.	Bank of America	JM	502.8
07/29/19	3.2	Meeting to discuss mediation strategy.	Bank of America	JM	506.0
07/30/19	9.0	Mediation	Bank of America	JM	515.0

07/31/19	0.3	E-mails with OC re discovery.	Bank of America	JM	515.3
07/31/19	2.0	Review and edit draft opposition to MSJ.	Bank of America	JM	517.3
08/01/19	0.7	E-mails re opposition to MSJ.	Bank of America	JM	518.0
08/01/19	0.6	E-mails re depositions.	Bank of America	JM	518.6
08/01/19	0.8	Review updated opposition to MSJ and e-mail edits.	Bank of America	JM	519.4
08/02/19	0.3	E-mails with expert re report.	Bank of America	JM	519.7
08/02/19	0.4	E-mails re scheduling deposition.	Bank of America	JM	520.1
08/02/19	6.0	Prepare for deposition.	Bank of America	JM	526.1
08/05/19	1.5	Review revised draft opposition to MSJ and e-mail edits.	Bank of America	JM	527.6
08/05/19	0.3	Call with expert re report.	Bank of America	JM	527.9
08/05/19	5.7	Prepare for deposition.	Bank of America	JM	533.6
08/05/19	2.0	Prepare exhibits for deposition.	Bank of America	JM	535.6
08/06/19	6.0	Fly to North Carolina for deposition, including preparing for deposition during flight.	Bank of America	JM	541.6
08/06/19	3.0	Strategy meeting with TC to discuss deposition.	Bank of America	JM	544.6
08/07/19	2.0	Revise deposition outline.	Bank of America	JM	546.6
08/07/19	5.6	Take deposition, including travel time to deposition reporting service.	Bank of America	JM	552.2
08/08/19	6.0	Return flight to Los Angeles.	Bank of America	JM	558.2
08/08/19	0.2	E-mail counsel in related cases.	Bank of America	JM	558.4
08/08/19	3.7	Review and edit draft opposition to MSJ.	Bank of America	JM	562.1
08/08/19	0.2	E-mails with co-counsel re MSJ opposition.	Bank of America	JM	562.3
08/09/19	3.3	Review and underline Oxrider's deposition transcript.	Bank of America	JM	565.6
08/09/19	2.5	Review and underline 30(b)(6) deposition transcript taken by NH.	Bank of America	JM	568.1
08/09/19	3.8	Review and finalize MSJ opposition	Bank of America	JM	571.9
08/12/19	1.5	E-mails re chambers copies and how to manually lodge electronic files as exhibits.	Bank of America	JM	573.4
08/15/19	1.0	Review Reply ISO MSJ.	Bank of America	JM	574.4
08/15/19	0.5	Meeting to discuss MSJ Reply.	Bank of America	JM	574.9
08/28/19	0.8	Work on errata re compendium of declarations.	Bank of America	JM	575.7
09/16/19	0.5	Review letter in response to subpoena	Bank of America	JM	576.2
09/19/19	0.3	E-mail instructions re MSJ hearing binder.	Bank of America	JM	576.5
09/19/19	0.2	E-mails re CMC statement.	Bank of America	JM	576.7
09/23/19	5.0	Review file to prepare for MSJ.	Bank of America	JM	581.7
09/23/19	0.4	Meeting re MSJ.	Bank of America	JM	582.1
09/24/19	6.8	Prepare MSJ argument outline.	Bank of America	JM	588.9
09/24/19	0.4	E-mails re MSJ.	Bank of America	JM	589.3
09/25/19	3.0	Fly to SF for MSJ and CMC hearings.	Bank of America	JM	592.3
09/25/19	6.5	Prepare MSJ argument outline.	Bank of America	JM	598.8
09/25/19	1.8	Meet with TC to discuss MSJ argument.	Bank of America	JM	600.6
09/26/19	2.0	Prepare for MSJ hearing.	Bank of America	JM	602.6
09/26/19	2.2	Travel to and attend MSJ and CMC hearings.	Bank of America	JM	604.8
09/26/19	3.5	Return flight to Los Angeles.	Bank of America	JM	608.3
09/26/19	0.7	Review statement of recent decision re Naranjo.	Bank of America	JM	609.0
09/26/19	4.5	Research and draft reply to statement of recent decision.	Bank of America	JM	613.5
09/27/19	7.8	Additional research and continue drafting response to statement of recent decision; finalize for filing.	Bank of America	JM	621.3
09/30/19	1.0	Response to administrative motion to enlarge opposition; finalize for filing.	Bank of America	JM	622.3
10/11/19	1.3	Review opposition to motion for class certification.	Bank of America	JM	623.6
10/12/19	6.5	Review opposition and supporting documents filed under seal.	Bank of America	JM	630.1
10/14/19	1.0	Meeting to discuss opposition to motion for class certification.	Bank of America	JM	631.1
10/14/19	3.0	Research re opposition to motion for class certification	Bank of America	JM	634.1
10/14/19	0.3	E-mail experts re opposition to motion for class certification.	Bank of America	JM	634.4
10/14/19	0.2	Call with survey expert.	Bank of America	JM	634.6
10/14/19	0.3	Call with data expert.	Bank of America	JM	634.9
10/14/19	0.6	E-mails re opposition to motion for class certification.	Bank of America	JM	635.5
10/14/19	2.8	Additional research re opposition to motion for class certification.	Bank of America	JM	638.3
10/15/19	0.2	E-mails with survey expert.	Bank of America	JM	638.5
10/15/19	0.3	E-mails with OC re discovery.	Bank of America	JM	638.8
10/15/19	0.4	Meeting to discuss opposition to motion for class certification.	Bank of America	JM	639.2
10/15/19	0.3	Call with data expert.	Bank of America	JM	639.5
10/15/19	6.5	Review and analyze defendant's expert's declaration.	Bank of America	JM	646.0
10/16/19	4.3	Continue analyzing defendant's expert's declaration.	Bank of America	JM	650.3
10/16/19	0.7	E-mails re reply ISO motion for class certification.	Bank of America	JM	651.0
10/17/19	0.5	E-mails re reply ISO motion for class certification.	Bank of America	JM	651.5

10/17/19	0.2	E-mails with OC re discovery.	Bank of America	JM	651.7
10/17/19	4.0	Research re reply ISO motion for class certification.	Bank of America	JM	655.7
10/18/19	0.3	Meeting to discuss reply ISO motion for class certification.	Bank of America	JM	656.0
10/18/19	0.5	E-mails re reply ISO motion for class certification.	Bank of America	JM	656.5
10/18/19	6.8	Draft reply ISO motion for class certification.	Bank of America	JM	663.3
10/21/19	0.2	E-mails with OC re discovery.	Bank of America	JM	663.5
10/21/19	5.2	Draft reply ISO motion for class certification.	Bank of America	JM	668.7
10/21/19	0.4	Meeting to discuss reply ISO motion for class certification.	Bank of America	JM	669.1
10/22/19	0.6	Review expert's report; e-mail expert re same.	Bank of America	JM	669.7
10/22/19	0.2	E-mails with OC re discovery.	Bank of America	JM	669.9
10/22/19	7.7	Finalize first draft of reply brief; circulate to team.	Bank of America	JM	677.6
10/23/19	0.4	E-mails re reply ISO motion for class certification.	Bank of America	JM	678.0
10/23/19	0.3	Meeting to discuss reply ISO motion for class certification.	Bank of America	JM	678.3
10/23/19	1.5	Review and incorporate edits to reply	Bank of America	JM	679.8
10/23/19	4.8	Additional revisions to reply brief.	Bank of America	JM	684.6
10/24/19	1.3	Review Padilla's deposition transcript.	Bank of America	JM	685.9
10/24/19	0.7	Review and revise expert report.	Bank of America	JM	686.6
10/24/19	8.8	Additional revisions to reply brief.	Bank of America	JM	695.4
10/25/19	1.7	Review and comment on survey expert's report.	Bank of America	JM	697.1
10/25/19	1.6	Review and comment on data expert's report.	Bank of America	JM	698.7
10/25/19	0.8	E-mails re finalizing reply brief.	Bank of America	JM	699.5
10/25/19	2.0	Finalize experts' reports.	Bank of America	JM	701.5
10/25/19	7.0	Finalize reply brief.	Bank of America	JM	708.5
10/28/19	0.2	E-mails with survey expert.	Bank of America	JM	708.7
10/28/19	0.3	E-mails re filing and courtesy copies	Bank of America	JM	709.0
10/31/19	0.4	Draft CMC statement; e-mail OC re same.	Bank of America	JM	709.4
10/31/19	1.0	Review MSJ ruling in Suarez	Bank of America	JM	710.4
10/31/19	0.3	E-mails re MSJ ruling in Suarez	Bank of America	JM	710.7
10/31/19	0.8	Review MSJ ruling in Frausto.	Bank of America	JM	711.5
10/31/19	0.6	E-mails re MSJ ruling in Frausto.	Bank of America	JM	712.1
11/01/19	1.5	Additional analysis on MSJ rulings	Bank of America	JM	713.6
11/01/19	0.6	E-mails re MSJ rulings.	Bank of America	JM	714.2
11/04/19	2.5	Review file and research authorities to compile list of documents for class certification hearing binder.	Bank of America	JM	716.7
11/04/19	6.0	Draft oral argument outline and notes.	Bank of America	JM	722.7
11/05/19	8.5	Draft oral argument outline and notes; email team re same.	Bank of America	JM	731.2
11/06/19	0.8	Read and respond to e-mails re oral argument outline.	Bank of America	JM	732.0
11/06/19	9.0	Prepare for oral argument.	Bank of America	JM	741.0
11/06/19	2.8	Fly to San Francisco for class certification hearing.	Bank of America	JM	743.8
11/07/19	2.0	Prepare for oral argument.	Bank of America	JM	745.8
11/07/19	2.3	Class certification hearing (including travel time and waiting to be called).	Bank of America	JM	748.1
11/07/19	3.0	Meeting to discuss hearing.	Bank of America	JM	751.1
11/07/19	2.5	Return flight to Los Angeles.	Bank of America	JM	753.6
11/14/19	0.2	E-mails re subpoena.	Bank of America	JM	753.8
11/15/19	0.5	Review transcript.	Bank of America	JM	754.3
12/03/19	1.0	Review class certification order.	Bank of America	JM	755.3
12/03/19	0.8	E-mails re class certification order.	Bank of America	JM	756.1
12/03/19	1.5	Meetings re class certification order.	Bank of America	JM	757.6
12/04/19	0.8	Review news articles discussing class certification order.	Bank of America	JM	758.4
12/04/19	0.5	E-mails re class certification order.	Bank of America	JM	758.9
12/04/19	0.3	Meetings re class certification order.	Bank of America	JM	759.2
12/05/19	0.2	E-mails re class certification order.	Bank of America	JM	759.4
12/10/19	0.2	E-mail OC re scheduling conference call.	Bank of America	JM	759.6
12/10/19	0.3	E-mail survey expert.	Bank of America	JM	759.9
12/11/19	0.2	Call with data expert.	Bank of America	JM	760.1
12/11/19	0.2	E-mails with OC re class definition	Bank of America	JM	760.3
12/11/19	1.0	Meeting to discuss class definition	Bank of America	JM	761.3
12/11/19	4.5	Research re class definition.	Bank of America	JM	765.8
12/12/19	0.4	Call with OC re class definition.	Bank of America	JM	766.2
12/18/19	1.0	Review 23(f) petition	Bank of America	JM	767.2
12/18/19	0.6	Meeting to discuss 23(f) petition	Bank of America	JM	767.8
12/18/19	2.5	Research re mechanics of opposition to 23(f); e-mail team re same.	Bank of America	JM	770.3
12/23/19	0.2	E-mail RD re 23(f) petition.	Bank of America	JM	770.5
12/26/19	0.2	Streamlined request for extension of time to oppose 23(f) petition	Bank of America	JM	770.7

12/26/19	0.2	E-mail OC re extension of time to file opposition.	Bank of America	JM	770.9
12/26/19	0.5	Motion to extend time to file opposition.	Bank of America	JM	771.4
12/26/19	2.4	Research on standard of review; e-mail RD re same.	Bank of America	JM	773.8
12/26/19	0.8	E-mails re 23(f) opposition.	Bank of America	JM	774.6
12/30/19	0.2	Read and respond to e-mail from OC re class definition.	Bank of America	JM	774.8
01/07/20	4.5	Review and edits draft of opposition to 23(f) petition.	Bank of America	JM	779.3
01/07/20	0.3	E-mails re 23(f) opposition.	Bank of America	JM	779.6
01/08/20	5.0	Edit latest draft of 23(f) opposition.	Bank of America	JM	784.6
01/08/20	0.5	E-mails re 23(f) opposition.	Bank of America	JM	785.1
01/08/20	0.3	Meeting to discuss 23(f) petition	Bank of America	JM	785.4
01/09/20	3.8	Additional edits to opposition to 23(f) petition	Bank of America	JM	789.2
01/09/20	1.0	E-mails re 23(f) opposition.	Bank of America	JM	790.2
01/10/20	1.5	Edit latest draft of 23(f) opposition.	Bank of America	JM	791.7
01/10/20	0.3	E-mails re 23(f) opposition.	Bank of America	JM	792.0
01/10/20	0.6	Review and finalize 23(f) opposition.	Bank of America	JM	792.6
01/17/20	0.1	E-mail OC re class definition	Bank of America	JM	792.7
01/22/20	0.2	Read and respond to e-mails re class definition.	Bank of America	JM	792.9
01/24/20	0.3	Draft joint CMC statement; e-mail OC re same.	Bank of America	JM	793.2
01/24/20	0.3	Review edits to joint CMC statement; e-mail OC re same.	Bank of America	JM	793.5
01/24/20	0.2	Call with OC re CMC statement.	Bank of America	JM	793.7
01/30/20	0.3	Call with counsel in related case.	Bank of America	JM	794.0
01/30/20	0.2	E-mail co-counsel re mediation.	Bank of America	JM	794.2
01/30/20	0.1	Read and respond to e-mail from OC.	Bank of America	JM	794.3
02/03/20	0.3	E-mail OC re mediation.	Bank of America	JM	794.6
02/05/20	0.3	Call with counsel in related case.	Bank of America	JM	794.9
02/05/20	0.1	E-mail counsel in related cases.	Bank of America	JM	795.0
02/05/20	0.8	Review stipulation; e-mails with OC re same.	Bank of America	JM	795.8
02/05/20	0.6	E-mails re mediation.	Bank of America	JM	796.4
02/07/20	0.4	Call with counsel in related case.	Bank of America	JM	796.8
02/07/20	0.3	Meeting to discuss call with counsel in related case.	Bank of America	JM	797.1
02/12/20	0.2	E-mails re mediation.	Bank of America	JM	797.3
02/14/20	0.1	E-mails re mediation.	Bank of America	JM	797.4
02/15/20	0.6	Read and respond to e-mails re mediation.	Bank of America	JM	798.0
02/19/20	0.2	E-mails re mediation.	Bank of America	JM	798.2
02/21/20	1.0	Read and respond to e-mails re mediation.	Bank of America	JM	799.2
02/21/20	0.2	Read and respond to e-mail from OC re mediation.	Bank of America	JM	799.4
02/24/20	0.3	E-mails with mediator's office.	Bank of America	JM	799.7
02/24/20	0.5	Meeting to discuss mediation.	Bank of America	JM	800.2
02/27/20	0.3	Meeting to discuss denial of 23(f) petition.	Bank of America	JM	800.5
03/02/20	0.2	E-mails with counsel in related case.	Bank of America	JM	800.7
03/03/20	6.4	Draft mediation brief.	Bank of America	JM	807.1
03/04/20	5.8	Draft mediation brief.	Bank of America	JM	812.9
03/05/20	2.0	Finalize initial draft of mediation brief and e-mail team.	Bank of America	JM	814.9
03/05/20	0.8	Review edits to mediation brief and circulate to co-counsel.	Bank of America	JM	815.7
03/06/20	5.2	Review and finalize mediation brief; e-mail mediator re same.	Bank of America	JM	820.9
03/09/20	0.5	Review mediation brief in related case.	Bank of America	JM	821.4
03/10/20	2.0	Meeting to discuss mediation.	Bank of America	JM	823.4
03/26/20	0.2	E-mails re rescheduling mediation.	Bank of America	JM	823.6
03/28/20	0.3	E-mails re rescheduling mediation.	Bank of America	JM	823.9
03/30/20	0.3	E-mails re rescheduling mediation.	Bank of America	JM	824.2
03/31/20	0.5	E-mails re rescheduling mediation.	Bank of America	JM	824.7
04/01/20	0.5	E-mails re rescheduling mediation.	Bank of America	JM	825.2
04/29/20	0.3	E-mails re rescheduling mediation.	Bank of America	JM	825.5
05/07/20	0.2	Call with counsel in related case.	Bank of America	JM	825.7
06/17/20	0.1	E-mail from mediator's office.	Bank of America	JM	825.8
06/22/20	0.2	E-mails with counsel in related case.	Bank of America	JM	826.0
06/23/20	0.3	E-mails with counsel in related case.	Bank of America	JM	826.3
06/25/20	0.2	E-mails with counsel in related case.	Bank of America	JM	826.5
07/09/20	0.1	E-mails with counsel in related case.	Bank of America	JM	826.6
07/13/20	0.5	Review new mediation data.	Bank of America	JM	827.1
07/13/20	0.2	E-mail expert re mediation data.	Bank of America	JM	827.3
07/13/20	0.2	Call with expert re mediation data.	Bank of America	JM	827.5
07/13/20	0.3	E-mails with expert re mediation data.	Bank of America	JM	827.8
07/14/20	0.2	Review expert's report; e-mail expert re same.	Bank of America	JM	828.0

07/15/20	0.3	E-mails with mediator's office.	Bank of America	JM	828.3
07/16/20	0.4	E-mails with counsel in related case.	Bank of America	JM	828.7
07/16/20	3.0	Draft mediation brief.	Bank of America	JM	831.7
07/17/20	0.3	Call with mediator re case	Bank of America	JM	832.0
07/17/20	4.8	Draft mediation brief.	Bank of America	JM	836.8
07/20/20	3.2	Finalize mediation brief.	Bank of America	JM	840.0
07/20/20	0.8	E-mails re mediation brief.	Bank of America	JM	840.8
07/21/20	0.3	E-mails re mediation	Bank of America	JM	841.1
07/21/20	0.6	Conference call re mediation strategy.	Bank of America	JM	841.7
07/22/20	4.0	Review file to prepare for mediation.	Bank of America	JM	845.7
07/22/20	0.5	E-mails with expert re report.	Bank of America	JM	846.2
07/23/20	3.0	Mediation.	Bank of America	JM	849.2
07/27/20	0.4	Meeting to discuss post-mediation strategy.	Bank of America	JM	849.6
07/28/20	1.5	Research re class definition.	Bank of America	JM	851.1
07/29/20	2.7	Research re class definition.	Bank of America	JM	853.8
07/29/20	0.6	E-mails re class definition.	Bank of America	JM	854.4
07/30/20	0.2	E-mails re class definition.	Bank of America	JM	854.6
07/31/20	0.2	E-mails re class definition.	Bank of America	JM	854.8
08/03/20	0.3	Review memo re class definition; e-mail re same.	Bank of America	JM	855.1
08/05/20	0.2	E-mails re class definition.	Bank of America	JM	855.3
08/11/20	0.3	E-mails with declarant.	Bank of America	JM	855.6
08/11/20	0.2	E-mails re class definition.	Bank of America	JM	855.8
08/12/20	0.5	Meeting re class definition.	Bank of America	JM	856.3
08/26/20	0.3	Meeting re class definition.	Bank of America	JM	856.6
09/03/20	0.4	E-mails re class definition.	Bank of America	JM	857.0
09/08/20	0.3	E-mails re class definition.	Bank of America	JM	857.3
09/09/20	0.3	E-mails re class definition.	Bank of America	JM	857.6
09/10/20	0.6	E-mails re class definition.	Bank of America	JM	858.2
09/17/20	0.5	Revise lead questionnaire for declarations re class definition.	Bank of America	JM	858.7
09/18/20	0.3	E-mails re class definition.	Bank of America	JM	859.0
09/21/20	0.4	Meeting re class definition.	Bank of America	JM	859.4
09/24/20	0.5	E-mails re class definition.	Bank of America	JM	859.9
09/30/20	0.6	E-mails re class definition.	Bank of America	JM	860.5
10/01/20	0.8	Research re class member declarants who worked at call centers.	Bank of America	JM	861.3
10/01/20	0.5	E-mails re class definition.	Bank of America	JM	861.8
10/05/20	0.3	E-mails re new declarations.	Bank of America	JM	862.1
10/06/20	0.4	E-mails re new declarations.	Bank of America	JM	862.5
10/07/20	0.2	E-mail from co-counsel re class definition.	Bank of America	JM	862.7
10/07/20	0.3	E-mails re new declarations.	Bank of America	JM	863.0
10/12/20	0.2	E-mails re new declarations.	Bank of America	JM	863.2
10/13/20	0.3	E-mails re new declarations.	Bank of America	JM	863.5
10/14/20	0.3	Draft CMC statement; e-mail OC re same.	Bank of America	JM	863.8
10/15/20	0.4	E-mails re cmc statement.	Bank of America	JM	864.2
10/15/20	0.5	Finalize CMC statement.	Bank of America	JM	864.7
10/21/20	0.3	E-mails re new declarations.	Bank of America	JM	865.0
10/22/20	0.3	E-mails re new declarations.	Bank of America	JM	865.3
10/26/20	0.5	Revise declaration.	Bank of America	JM	865.8
10/26/20	0.3	E-mails re new declarations.	Bank of America	JM	866.1
01/12/21	0.2	Revise CMC statement; e-mail OC re same.	Bank of America	JM	866.3
01/14/21	0.3	Finalize CMC statement.	Bank of America	JM	866.6
02/03/21	0.5	E-mails re class definition.	Bank of America	JM	867.1
02/04/21	3.8	Research re motion for reconsideration.	Bank of America	JM	870.9
02/11/21	0.5	E-mails re motion for reconsideration.	Bank of America	JM	871.4
04/01/21	0.2	E-mails re supplemental initial disclosures.	Bank of America	JM	871.6
04/01/21	0.6	Review motion for reconsideration	Bank of America	JM	872.2
04/01/21	2.2	Research and analysis re motion for reconsideration.	Bank of America	JM	874.4
04/01/21	0.5	Meeting re motion for reconsideration.	Bank of America	JM	874.9
04/05/21	0.3	E-mails with RD re motion for reconsideration.	Bank of America	JM	875.2
04/06/21	5.0	Revise plaintiffs' motion for reconsideration; e-mail co-counsel re same.	Bank of America	JM	880.2
04/07/21	0.3	E-mails re plaintiffs' motion for reconsideration.	Bank of America	JM	880.5
04/07/21	3.8	Further edits to plaintiffs' motion for reconsideration.	Bank of America	JM	884.3
04/08/21	6.0	Review and finalize plaintiffs' motion for reconsideration.	Bank of America	JM	890.3
04/12/21	0.3	E-mails re defendant's motion for reconsideration.	Bank of America	JM	890.6
04/22/21	0.2	E-mails re defendant's motion for reconsideration.	Bank of America	JM	890.8

04/22/21	0.5	Review defendant's opposition to plaintiff's motion for reconsideration.	Bank of America	JM	891.3
04/22/21	2.3	Revise plaintiffs' opposition to defendant's motion for reconsideration; e-mail RD re same.	Bank of America	JM	893.6
04/23/21	3.0	Further edits to plaintiffs' opposition to defendant's motion for reconsideration.	Bank of America	JM	896.6
04/23/21	0.1	E-mail co-counsel re opposition to motion for reconsideration.	Bank of America	JM	896.7
04/27/21	0.4	Review co-counsel's edits to opposition	Bank of America	JM	897.1
04/27/21	0.3	E-mails re motion for reconsideration.	Bank of America	JM	897.4
04/27/21	0.5	Edits re opposition to motion for reconsideration.	Bank of America	JM	897.9
04/28/21	0.6	E-mails re opposition to motion for reconsideration.	Bank of America	JM	898.5
04/28/21	0.2	E-mail co-counsel re opposition to motion for reconsideration.	Bank of America	JM	898.7
04/28/21	1.0	Review additional edits to opposition to motion for reconsideration.	Bank of America	JM	899.7
04/29/21	0.8	E-mails re opposition to motion for reconsideration.	Bank of America	JM	900.5
04/29/21	1.5	Review and finalize opposition to motion for reconsideration.	Bank of America	JM	902.0
05/20/21	0.6	Review defendant's reply ISO motion for reconsideration.	Bank of America	JM	902.6
05/21/21	0.3	E-mails re defendant's reply.	Bank of America	JM	902.9
06/14/21	5.0	Prepare for motion for reconsideration.	Bank of America	JM	907.9
06/15/21	8.0	Prepare for motion for reconsideration.	Bank of America	JM	915.9
06/16/21	9.0	Prepare for motion for reconsideration.	Bank of America	JM	924.9
06/17/21	2.0	Prepare for motion for reconsideration.	Bank of America	JM	926.9
06/17/21	1.1	Argue motion for reconsideration (including time waiting to be heard).	Bank of America	JM	928.0
06/17/21	0.4	Review order denying class certification.	Bank of America	JM	928.4
06/17/21	0.3	Meeting re order denying class certification.	Bank of America	JM	928.7
06/17/21	0.2	E-mail RD re 23(f) petition.	Bank of America	JM	928.9
06/17/21	2.8	Research re 23(f) petition.	Bank of America	JM	931.7
06/24/21	0.2	E-mail co-counsel re 23(f) petition.	Bank of America	JM	931.9
06/30/21	1.0	Review and edit draft of 23(f) petition.	Bank of America	JM	932.9
06/30/21	0.6	E-mails re 23(f) petition	Bank of America	JM	933.5
06/30/21	0.7	Meeting re 23(f) petition.	Bank of America	JM	934.2
07/01/21	4.8	Revise and finalize 23(f) petition.	Bank of America	JM	939.0
09/16/21	0.2	Review notice of change of counsel.	Bank of America	JM	939.2
11/09/21	0.2	Read and respond to e-mail from OC.	Bank of America	JM	939.4
10/10/21	0.2	Edits to CMC statement.	Bank of America	JM	939.6
11/11/21	0.3	E-mail expert re Ferra issue.	Bank of America	JM	939.9
11/11/21	0.3	E-mails re revised CMC statement.	Bank of America	JM	940.2
11/16/21	0.5	Review expert's report; e-mail expert re same.	Bank of America	JM	940.7
01/18/22	0.3	Read and respond to e-mails from OC	Bank of America	JM	941.0
01/19/22	0.2	Conference call with OC.	Bank of America	JM	941.2
01/20/22	0.2	Finalize CMC statement.	Bank of America	JM	941.4
01/20/22	0.2	E-mails with OC re mediation.	Bank of America	JM	941.6
01/21/22	0.3	E-mails with mediator's office.	Bank of America	JM	941.9
01/27/22	0.2	E-mails with expert.	Bank of America	JM	942.1
03/07/22	0.5	Review expert's report; e-mail expert re same.	Bank of America	JM	942.6
03/08/22	0.3	Review expert's revised report.	Bank of America	JM	942.9
03/14/22	0.3	E-mails with mediator's office.	Bank of America	JM	943.2
03/15/22	0.1	E-mails with OC re mediation.	Bank of America	JM	943.3
03/15/22	0.2	E-mails with mediator's office.	Bank of America	JM	943.5
07/18/22	0.2	E-mail OC re mediation data.	Bank of America	JM	943.7
07/22/22	0.3	E-mails with expert.	Bank of America	JM	944.0
07/26/22	0.1	Read e-mail from OC re mediation data.	Bank of America	JM	944.1
07/26/22	0.5	E-mails with expert re report.	Bank of America	JM	944.6
07/28/22	0.3	Call with expert re data.	Bank of America	JM	944.9
07/29/22	0.2	E-mails with expert re report.	Bank of America	JM	945.1
07/31/22	4.0	Draft mediation brief.	Bank of America	JM	949.1
08/01/22	2.5	Review file to prepare for mediation.	Bank of America	JM	951.6
08/02/22	5.6	Mediation.	Bank of America	JM	957.2
08/04/22	3.0	Review and edit long form settlement agreement; e-mail OC re same.	Bank of America	JM	960.2
09/29/22	0.1	E-mail OC re long form	Bank of America	JM	960.3
10/07/22	0.1	E-mail OC re long form	Bank of America	JM	960.4
10/18/22	0.2	E-mails re long form settlement agreement.	Bank of America	JM	960.6
11/08/22	0.2	E-mails re long form settlement agreement.	Bank of America	JM	960.8
12/05/22	3.5	Draft class notice; e-mail OC re same.	Bank of America	JM	964.3
12/06/22	0.1	E-mails re long form settlement agreement.	Bank of America	JM	964.4
01/05/23	1.0	Review edits to long form, notice, and amended complaint.	Bank of America	JM	965.4

01/05/23	0.2	E-mail OC re latest drafts.	Bank of America	JM	965.6
01/17/23	0.1	E-mails re long form settlement agreement.	Bank of America	JM	965.7
01/24/23	0.4	Review revised drafts.	Bank of America	JM	966.1
01/26/23	0.3	E-mails re revised drafts.	Bank of America	JM	966.4
02/21/23	0.2	E-mails re revised drafts.	Bank of America	JM	966.6
03/27/23	0.1	E-mails re revised drafts.	Bank of America	JM	966.7
03/30/23	0.3	E-mails re revised drafts.	Bank of America	JM	967.0
04/26/23	0.2	E-mails re revised drafts.	Bank of America	JM	967.2
04/27/23	0.1	E-mails re revised drafts.	Bank of America	JM	967.3
04/28/23	0.2	E-mails re revised drafts.	Bank of America	JM	967.5
05/24/23	7.0	Draft motion for preliminary approval and related documents.	Bank of America	JM	974.5
05/25/23	8.5	Finalize motion for preliminary approval and related documents; e-mail OC re same.	Bank of America	JM	983.0
05/31/23	0.6	Review OC's edits to motion for preliminary approval and related documents.	Bank of America	JM	983.6
06/01/23	1.5	Finalize motion for preliminary approval and related documents.	Bank of America	JM	985.1
07/26/23	2.0	Prepare for motion for preliminary approval.	Bank of America	JM	987.1
07/27/23	1.4	Motion for preliminary approval (including time waiting to be called).	Bank of America	JM	988.5
09/07/23	0.3	Review order granting preliminary approval.	Bank of America	JM	988.8
09/07/23	0.2	E-mails re order granting preliminary approval.	Bank of America	JM	989.0
09/08/23	0.5	E-mail administrator re order granting preliminary approval.	Bank of America	JM	989.5
09/10/23	0.2	E-mail administrator re order granting preliminary approval.	Bank of America	JM	989.7
09/12/23	0.2	E-mails with administrator	Bank of America	JM	989.9
10/06/23	0.2	E-mails with OC re escalator.	Bank of America	JM	990.1
10/11/23	0.3	Call with administrator	Bank of America	JM	990.4
10/11/23	0.1	E-mail OC re administrator	Bank of America	JM	990.5
10/12/23	0.2	E-mails with administrator	Bank of America	JM	990.7
10/13/23	0.2	E-mails with administrator	Bank of America	JM	990.9
10/27/23	0.1	Review weekly administration report.	Bank of America	JM	991.0
11/03/23	0.1	Review weekly administration report.	Bank of America	JM	991.1
11/08/23	0.3	E-mail Bradford Smith ("BS") instructions for motion for attorney's fees	Bank of America	JM	991.4
11/10/23	0.2	Conference call to discuss motion for attorney's fees.	Bank of America	JM	991.6
11/10/23	0.1	Review weekly administration report.	Bank of America	JM	991.7
11/14/23	5.2	Review and revise draft of motion for attorney's fees; e-mail BS re same.	Bank of America	JM	996.9
11/14/23	0.2	E-mails re motion for attorney's fees to co-counsel and OC.	Bank of America	JM	997.1
11/16/23	1.0	Additional edits to motion for attorney's fees	Bank of America	JM	998.1
11/16/23	0.2	E-mails re motion for attorney's fees.	Bank of America	JM	998.3
11/20/23	2.0	Finalize motion for attorney's fees.	Bank of America	JM	1000.3
11/20/23	0.3	E-mails re motion for attorney's fees.	Bank of America	JM	1000.6

CONFIDENTIAL and WORK PRODUCT - THIAGO COELHO TIMESHEETS

Date:	Hours:	Description	Case	Atty	Case total:
01/25/19	0.5	Meet with Justin Marquez ("JM") and Bobby Saadian ("BS") re case status and strategy	Bank of America	TC	0.5
01/25/19	1.9	Review OC's meet and confer letter re discovery; comments re same.	Bank of America	TC	2.4
01/28/19	0.7	Review file re transition	Bank of America	TC	3.1
01/30/19	0.1	Review email to OPC re transition	Bank of America	TC	3.2
02/01/19	0.1	Review notice of substitution of counsel	Bank of America	TC	3.3
02/07/19	0.1	Review email OPC re mediation and discovery	Bank of America	TC	3.4
02/14/19	0.7	Review emails with counsel re related case	Bank of America	TC	4.1
02/19/19	0.2	Review follow up email to OPC re mediation and discovery	Bank of America	TC	4.3
02/19/19	0.2	Review and comment re email from OPC re mediation and discovery	Bank of America	TC	4.5
02/20/19	0.2	Review and comment re email from OPC re mediation and discovery	Bank of America	TC	4.7
02/25/19	0.3	Review notes re call with OPC re discovery and mediation	Bank of America	TC	5.0
02/25/19	0.5	Review and comment re email expert re case retention	Bank of America	TC	5.5
02/25/19	0.2	Review notes re call with expert re retention	Bank of America	TC	5.7
02/26/19	0.8	Review data and email re data to expert	Bank of America	TC	6.5
03/04/19	1.3	Review case for discovery and mediation strategies	Bank of America	TC	7.8
03/04/19	0.1	Review email to OPC re mediation and discovery	Bank of America	TC	7.9
03/05/19	0.1	Review and comment to email from OPC re mediation and discovery	Bank of America	TC	8.0
03/05/19	0.1	Review notes on call with OPC re discovery and mediation plan	Bank of America	TC	8.1
03/05/19	0.2	Review email OPC memorializing call	Bank of America	TC	8.3
03/06/19	0.3	Review and comment re email from OPC re mediation and discovery.	Bank of America	TC	8.6
03/06/19	0.8	emails with JM and Nicol Hajjar ("NH") re mediation.	Bank of America	TC	9.4
03/06/19	0.5	Review and comment re draft CMC statement	Bank of America	TC	9.9
03/06/19	0.3	email JM and NH re Belaire-West notice with comments	Bank of America	TC	10.2
03/06/19	0.5	Meet with JM and NH to discuss strategy re mediation	Bank of America	TC	10.7
03/06/19	0.1	Review email OPC re Belaire-West notice.	Bank of America	TC	10.8
03/07/19	0.3	Review emails with OPC re mediation.	Bank of America	TC	11.1
03/08/19	0.2	Review emails with OPC re mediation.	Bank of America	TC	11.3
03/11/19	2.9	Research mediation strategy.	Bank of America	TC	14.2
03/11/19	2.0	Meet with JM and NH to discuss strategy re mediation	Bank of America	TC	16.2
03/11/19	2.4	Research re survey evidence and Duran	Bank of America	TC	18.6
03/12/19	1.1	Comments re letter to OPC re mediation data	Bank of America	TC	19.7
03/12/19	0.3	Discuss letter to OPC re mediation data with JM and NH	Bank of America	TC	20.0
03/12/19	0.2	emails with JM and NH re mediation data	Bank of America	TC	20.2
03/12/19	0.9	Review email re instructions on survey evidence memo	Bank of America	TC	21.1
03/13/19	3.5	Research materials for expert	Bank of America	TC	24.6
03/13/19	0.1	Review email expert re data.	Bank of America	TC	24.7
03/13/19	0.2	Review emails to OPC re mediation data	Bank of America	TC	24.9
03/13/19	0.8	Review file to prepare notes for CMC.	Bank of America	TC	25.7
03/14/19	4.8	Research and preparation for mediation	Bank of America	TC	30.5
03/15/19	1.3	Research and preparation for mediation	Bank of America	TC	31.8
03/15/19	1.0	Meet with JM and NH to discuss strategy re mediation	Bank of America	TC	32.8
03/18/19	0.3	Review and comment to email from OPC re mediation and discovery	Bank of America	TC	33.1
03/19/19	0.2	Review emails re questionnaire	Bank of America	TC	33.3
03/19/19	0.9	Review and comment on revisions to Belaire-West questionnaire	Bank of America	TC	34.2
03/20/19	0.3	Review notes re call with OPC re mediation	Bank of America	TC	34.5
03/20/19	3.6	Research based on JM meeting with intake department re questionnaire	Bank of America	TC	38.1
03/21/19	0.4	Review emails re conference call with OPC.	Bank of America	TC	38.5
03/21/19	2.3	Review and comment for further revisions to questionnaire	Bank of America	TC	40.8
03/22/19	0.2	Review emails re mediation	Bank of America	TC	41.0
03/22/19	0.7	Read memo from associate re survey evidence	Bank of America	TC	41.7
03/22/19	2.4	Additional research of survey evidence based on memo	Bank of America	TC	44.1
03/24/19	2.7	Create strategy for intake department re questionnaire	Bank of America	TC	46.8
03/25/19	0.2	Review emails to intake department re questionnaire.	Bank of America	TC	47.0
03/25/19	1.0	Meet with JM and RD to discuss class member declaration template	Bank of America	TC	48.0
03/28/19	1.3	Meet with JM and Robert Dart ("RD") to discuss case	Bank of America	TC	49.3
03/28/19	0.5	Review JM email RD memo re case and topics for research	Bank of America	TC	49.8
03/28/19	2.8	Additional research re mediation strategy	Bank of America	TC	52.6
03/28/19	3.2	Review and comment on memo re mediation strategy	Bank of America	TC	55.8

03/29/19	1.7	Review and comment on near-final memo re mediation strategy	Bank of America	TC	57.5
03/29/19	3.0	Meet with JM, NH, and RD re case strategy.	Bank of America	TC	60.5
03/29/19	1.6	Research survey expert to retain	Bank of America	TC	62.1
03/31/19	1.7	Comments for memo to survey expert re scope of work and retention	Bank of America	TC	63.8
03/31/19	0.3	Review email re questionnaire respondent	Bank of America	TC	64.1
04/01/19	0.5	Meet with JM and NH to discuss strategy re conference call with OPC	Bank of America	TC	64.6
04/01/19	1.3	Prepare materials for conference call with OPC re mediation	Bank of America	TC	65.9
04/01/19	0.8	Review and comment on revised questionnaire	Bank of America	TC	66.7
04/04/19	0.1	Review email to marketing re revised questionnaire	Bank of America	TC	66.8
04/01/19	1.5	Meet with JM and RD to discuss class member declaration template	Bank of America	TC	68.3
04/01/19	2.5	Comments for revised class member declaration template	Bank of America	TC	70.8
04/02/19	0.5	Review questionnaire leads and emails re same.	Bank of America	TC	71.3
04/02/19	0.3	Review emails between JM and BS re potential declarant	Bank of America	TC	71.6
04/02/19	0.2	emails with JM and NH re questionnaire leads	Bank of America	TC	71.8
04/02/19	0.5	Meet with JM, NH, and RD re case strategy	Bank of America	TC	72.3
04/02/19	0.6	Review and and comment on revised class member declaration	Bank of America	TC	72.9
04/02/19	0.2	Review email re call with questionnaire respondent	Bank of America	TC	73.1
04/02/19	3.0	Research revisions for class member declaration	Bank of America	TC	76.1
04/03/19	1.8	Review and comment on revised class member declaration	Bank of America	TC	77.9
04/03/19	0.7	Review emails re questionnaire leads	Bank of America	TC	78.6
04/03/19	0.3	Review emails with RD re Frausto's declaration	Bank of America	TC	78.9
04/04/19	0.9	Review emails re questionnaire leads	Bank of America	TC	79.8
04/04/19	1.0	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	80.8
04/04/19	2.2	Review and and comment on revised class member declarations	Bank of America	TC	83.0
04/05/19	1.0	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	84.0
04/05/19	3.1	Draft revisions re class member declarations	Bank of America	TC	87.1
04/06/19	0.3	Review email to survey expert	Bank of America	TC	87.4
04/06/19	0.2	Review email re contract attorneys	Bank of America	TC	87.6
04/08/19	1.0	Meet with JM and Patty Chen ("PC") re case	Bank of America	TC	88.6
04/08/19	0.1	Review email PC case memo	Bank of America	TC	88.7
04/08/19	1.0	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	89.7
04/08/19	0.5	Review multiple emails to contract attorneys leads list	Bank of America	TC	90.2
04/08/19	0.5	Confer with contract attorney re progress	Bank of America	TC	90.7
04/08/19	0.5	Review memo on survey evidence	Bank of America	TC	91.2
04/08/19	0.2	email OPC re mediation data	Bank of America	TC	91.4
04/09/19	0.6	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	92.0
04/09/19	2.3	Meet with JM, NH, and RD re mediation brief	Bank of America	TC	94.3
04/09/19	0.7	emails with contract attorneys re leads	Bank of America	TC	95.0
04/09/19	0.5	email OPC re Belaire-West list	Bank of America	TC	95.5
04/09/19	0.8	Review and comment on call with Frausto re declaration	Bank of America	TC	96.3
04/09/19	0.2	Review and respond to email to RD re Frausto's declaration	Bank of America	TC	96.5
04/09/19	5.2	Research re scope of class definition; email JM, NH, RD, and PC re same.	Bank of America	TC	101.7
04/10/19	0.6	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	102.3
04/10/19	0.3	Review email from JM re survey research	Bank of America	TC	102.6
04/10/19	0.7	Review and revise declaration template	Bank of America	TC	103.3
04/10/19	1.6	Research re survey	Bank of America	TC	104.9
04/10/19	0.2	Review and comment on email to OPC re mediation data	Bank of America	TC	105.1
04/10/19	0.1	Review email to survey expert	Bank of America	TC	105.2
04/10/19	0.5	Conference call with survey expert	Bank of America	TC	105.7
04/10/19	1.9	Review and revise declaration template	Bank of America	TC	107.6
04/11/19	0.4	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	108.0
04/11/19	7.6	Research and notes for mediation	Bank of America	TC	115.6
04/11/19	0.1	Review email to OPC re mediation data	Bank of America	TC	115.7
04/12/19	3.3	Review and revise draft mediation brief	Bank of America	TC	119.0
04/12/19	0.5	Meet with contract attorneys to discuss declaration template and strategy.	Bank of America	TC	119.5
04/12/19	0.3	Provide comment for emails with contract attorneys re leads.	Bank of America	TC	119.8
04/12/19	2.6	Research and revise class member declarations	Bank of America	TC	122.4
04/12/19	2.9	Review and revise draft mediation brief	Bank of America	TC	125.3
04/12/19	0.5	Meet with team to discuss case strategy	Bank of America	TC	125.8
04/13/19	1.4	Provide comments for emails with contract attorneys re draft declarations	Bank of America	TC	127.2
04/13/19	0.5	Review emails with contract attorneys re leads	Bank of America	TC	127.7
04/14/19	0.4	Review emails with contract attorneys re leads	Bank of America	TC	128.1
04/14/19	4.3	Research and revise draft mediation brief	Bank of America	TC	132.4
04/15/19	0.1	Review email survey expert	Bank of America	TC	132.5

04/15/19	0.3	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	132.8
04/15/19	0.5	Meet with team to discuss mediation brief	Bank of America	TC	133.3
04/15/19	0.1	Review email to contract attorneys re leads	Bank of America	TC	133.4
04/15/19	0.2	email JM and RD re declaration cites	Bank of America	TC	133.6
04/15/19	1.6	Research re regular rate claim; email JM and RD re same	Bank of America	TC	135.2
04/15/19	0.3	Review and comment on email from OPC re mediation and discovery	Bank of America	TC	135.5
04/15/19	5.3	Review and revise draft mediation brief	Bank of America	TC	140.8
04/15/19	1.3	Review survey expert's report and review email to team initial thoughts	Bank of America	TC	142.1
04/15/19	4.5	Review and propose revisions re survey expert	Bank of America	TC	146.6
04/16/19	2.4	Review and comment on initial draft of mediation brief	Bank of America	TC	149.0
04/16/19	0.5	Meet with contract attorneys to discuss declaration template and strategy	Bank of America	TC	149.5
04/16/19	0.9	Research revisions to Frausto's declarations	Bank of America	TC	150.4
04/16/19	2.7	Review and comment on revised mediation brief	Bank of America	TC	153.1
04/16/19	0.8	Research re declarations; email team re same	Bank of America	TC	153.9
04/16/19	0.1	Review notes re call with class member re declaration	Bank of America	TC	154.0
04/16/19	2.5	Review and propose further revisions to expert report	Bank of America	TC	156.5
04/16/19	0.2	Review emails with PC re declarations	Bank of America	TC	156.7
04/16/19	2.6	Review and propose edits to near-final mediation brief	Bank of America	TC	159.3
04/16/19	1.2	Proposed final edits to mediation brief	Bank of America	TC	160.5
04/16/19	0.1	review email to BS re mediation brief	Bank of America	TC	160.6
04/17/19	0.2	Review emails with OPC re mediation	Bank of America	TC	160.8
04/18/19	0.5	Review issues for emails with mediator's office	Bank of America	TC	161.3
04/19/19	0.8	Prepare information for conference call with mediator to discuss brief	Bank of America	TC	162.1
04/19/19	4.8	Research re motion to intervene	Bank of America	TC	166.9
04/19/19	1.2	Review motion to intervene	Bank of America	TC	168.1
04/20/19	2.4	Review and revise class member declarations	Bank of America	TC	170.5
04/20/19	3.5	Review case and mediation briefs to prepare for mediation	Bank of America	TC	174.0
04/21/19	5.0	Prepare for mediation, including meetings with JM and NH	Bank of America	TC	179.0
04/22/19	6.8	Feedback re mediation with Judge Sabraw	Bank of America	TC	185.8
04/23/19	0.1	Review email with OPC re mediation	Bank of America	TC	185.9
04/23/19	5.7	Research re motion to intervene	Bank of America	TC	191.6
04/24/19	0.8	Prepare instructions to PC re opposition to motion to intervene	Bank of America	TC	192.4
04/25/19	1.3	Review of emails with opposition to motion to intervene	Bank of America	TC	193.7
04/26/19	0.2	Review and comment to email from mediator	Bank of America	TC	193.9
04/26/19	0.3	email PC re leads	Bank of America	TC	194.2
04/30/19	0.2	Review email to mediator	Bank of America	TC	194.4
05/01/19	1.0	Call with Frausto re deposition	Bank of America	TC	195.4
05/02/19	0.6	Review of emails re motion to intervene	Bank of America	TC	196.0
05/02/19	0.1	email OPC re deposition and motion to intervene	Bank of America	TC	196.1
05/02/19	0.1	Review and comment to OPC's email re deposition and motion to intervene	Bank of America	TC	196.2
05/02/19	3.7	Research re opposition to motion to intervene	Bank of America	TC	199.9
05/02/19	3.9	Reivew and revise opposition to motion to intervene	Bank of America	TC	203.8
05/03/19	6.2	Further revision to opposition to motion to intervene	Bank of America	TC	210.0
05/03/19	4.5	Conference call with Frausto re deposition	Bank of America	TC	214.5
05/04/19	0.1	Review email Frausto re documents to review	Bank of America	TC	214.6
05/06/19	5.3	Finalize notes for use at for Plaintiff's deposition	Bank of America	TC	219.9
05/10/19	3.6	Research re reply re motion to intervene	Bank of America	TC	223.5
05/10/19	1.3	Research re motion to intervene	Bank of America	TC	224.8
05/14/19	0.8	Review of emails re motion to intervene	Bank of America	TC	225.6
05/16/19	0.3	Review of emails re CMC	Bank of America	TC	225.9
05/20/19	0.5	Call with counsel in related case	Bank of America	TC	226.4
05/20/19	0.3	Review of emails re call with counsel in related case	Bank of America	TC	226.7
05/20/19	0.2	Review of emails re call with counsel in intervenor's case	Bank of America	TC	226.9
05/21/19	0.1	Review of emails re call with counsel in intervenor's case	Bank of America	TC	227.0
05/21/19	5.2	Research re related case; review email to OPC	Bank of America	TC	232.2
05/22/19	0.3	Call with intervenor's counsel	Bank of America	TC	232.5
05/24/19	0.3	Call with mediator re case	Bank of America	TC	232.8
05/29/19	0.3	Review of emails with counsel for related case	Bank of America	TC	233.1
05/29/19	0.2	Review and comment to email re supplemental discovery responses	Bank of America	TC	233.3
05/30/19	0.4	Call with counsel in related case	Bank of America	TC	233.7
05/31/19	0.3	Call with counsel in related case	Bank of America	TC	234.0
05/31/19	0.5	Call with expert	Bank of America	TC	234.5
06/02/19	7.1	Research and draft re motion for class certification	Bank of America	TC	241.6
06/03/19	0.6	Review of emails re motion for class certification	Bank of America	TC	242.2

06/03/19	0.5	Meeting re motion for class certification	Bank of America	TC	242.7
06/04/19	2.3	Review expert's report; review email to expert re same	Bank of America	TC	245.0
06/04/19	0.5	Review of emails with counsel for related case	Bank of America	TC	245.5
06/04/19	5.2	Draft portions of motion for class certification and related documents	Bank of America	TC	250.7
06/04/19	1.4	Review of emails re motion for class certification.	Bank of America	TC	252.1
06/05/19	5.5	Revise draft motion for class certification and related documents	Bank of America	TC	257.6
06/05/19	0.8	Review of emails re motion for class certification	Bank of America	TC	258.4
06/06/19	0.7	Review expert's report; review email to expert re same	Bank of America	TC	259.1
06/06/19	0.4	Review of emails with expert re report	Bank of America	TC	259.5
06/06/19	0.3	Call with co-counsel re mediation	Bank of America	TC	259.8
06/08/19	0.2	Review email to co-counsel re motion for class certification	Bank of America	TC	260.0
06/10/19	0.3	Review email to co-counsel re motion for class certification	Bank of America	TC	260.3
06/10/19	0.7	Meeting to discuss motion for class certification	Bank of America	TC	261.0
06/10/19	8.2	Research and draft supporting documents re motion for class certification	Bank of America	TC	269.2
06/10/19	0.5	Review expert's report; review email to expert re same	Bank of America	TC	269.7
06/10/19	0.2	Review email to co-counsel re motion for class certification	Bank of America	TC	269.9
06/11/19	4.3	Research and review expert's report; review email to expert re same	Bank of America	TC	274.2
06/11/19	0.3	Review email survey expert re report	Bank of America	TC	274.5
06/12/19	0.2	Review of emails with expert re report	Bank of America	TC	274.7
06/12/19	0.9	Review co-counsel's edits to motion for class certification	Bank of America	TC	275.6
06/13/19	0.2	Review and revise motion to shorten time	Bank of America	TC	275.8
06/13/19	3.6	Review and revise motion for class certification	Bank of America	TC	279.4
06/14/19	0.2	Review email to co-counsel re motion for class certification	Bank of America	TC	279.6
06/14/19	4.2	Review and revise motion for class certification and related documents	Bank of America	TC	283.8
06/16/19	2.5	Review and revise motion for class certification filing	Bank of America	TC	286.3
06/18/19	0.3	Meeting to discuss strategy going forward	Bank of America	TC	286.6
06/19/19	0.4	Meeting to discuss strategy going forward	Bank of America	TC	287.0
06/21/19	0.5	Review and finalize administrative motion	Bank of America	TC	287.5
07/05/19	0.3	Review of emails re mediation	Bank of America	TC	287.8
07/05/19	0.2	Call with counsel in related case	Bank of America	TC	288.0
07/08/19	0.2	Review of emails with counsel in related case	Bank of America	TC	288.2
07/09/19	0.2	Review of emails with OPC re CMC statement	Bank of America	TC	288.4
07/09/19	0.4	Draft CMC statement; Review email re same	Bank of America	TC	288.8
07/11/19	0.3	Review edits to CMC statement; Review email to re same	Bank of America	TC	289.1
07/14/19	0.5	Review and comment to email from expert re second mediation	Bank of America	TC	289.6
07/16/19	3.0	Review file for CMC	Bank of America	TC	292.6
07/17/19	1.4	Research motion for class certification; review order denying class certification in Castillo	Bank of America	TC	294.0
07/17/19	0.3	Review of emails with counsel in related case	Bank of America	TC	294.3
07/18/19	0.8	Review and comment re CMC	Bank of America	TC	295.1
07/18/19	0.5	Conference call with counsel in related case	Bank of America	TC	295.6
07/18/19	1.0	Strategy meeting to discuss second mediation	Bank of America	TC	296.6
07/19/19	0.3	Review of emails re second mediation	Bank of America	TC	296.9
07/19/19	6.9	Research re second mediation brief	Bank of America	TC	303.8
07/20/19	6.4	Review and revise second mediation brief	Bank of America	TC	310.2
07/22/19	0.3	Review of emails with counsel in related case	Bank of America	TC	310.5
07/22/19	0.2	Conference call with counsel in related case	Bank of America	TC	310.7
07/22/19	0.6	Review of emails re second mediation brief	Bank of America	TC	311.3
07/22/19	2.3	Review edits and revise second mediation brief	Bank of America	TC	313.6
07/23/19	4.5	Review memo re pending cases and past settlements; additional research re same	Bank of America	TC	318.1
07/23/19	0.3	Review emails counsel in related cases	Bank of America	TC	318.4
07/23/19	1.5	Review and comment on mediation brief; review email to mediator re same	Bank of America	TC	319.9
07/24/19	0.3	Review of emails with OPC re discovery	Bank of America	TC	320.2
07/25/19	0.5	Review of emails with OPC re discovery	Bank of America	TC	320.7
07/26/19	0.3	Review of emails with OPC re discovery	Bank of America	TC	321.0
07/26/19	0.2	Review of emails re mediation	Bank of America	TC	321.2
07/26/19	4.4	Review MSJ; research re opposition to same	Bank of America	TC	325.6
07/26/19	0.6	Meeting to discuss MSJ	Bank of America	TC	326.2
07/29/19	0.5	Call with mediator re case	Bank of America	TC	326.7
07/29/19	4.5	Research re MSJ	Bank of America	TC	331.2
07/29/19	0.4	Meeting to discuss MSJ opposition	Bank of America	TC	331.6
07/29/19	3.2	Meeting to discuss mediation strategy	Bank of America	TC	334.8
07/30/19	9.0	Mediation	Bank of America	TC	343.8

07/31/19	0.3	Review of emails with OPC re discovery	Bank of America	TC	344.1
07/31/19	6.1	Review and revise opposition to MSJ	Bank of America	TC	350.2
08/01/19	0.7	Review of emails re opposition to MSJ	Bank of America	TC	350.9
08/01/19	0.6	Review of emails re depositions	Bank of America	TC	351.5
08/01/19	0.8	Review and comment on opposition to MSJ and email edits	Bank of America	TC	352.3
08/02/19	0.3	Review of emails with expert re report	Bank of America	TC	352.6
08/02/19	0.4	Review of emails re scheduling deposition	Bank of America	TC	353.0
08/02/19	3.9	Research and preparation for deposition	Bank of America	TC	356.9
08/05/19	3.5	Review and revise opposition to MSJ and email edits	Bank of America	TC	360.4
08/05/19	0.3	Call with expert re report	Bank of America	TC	360.7
08/05/19	3.2	Prepare for deposition	Bank of America	TC	363.9
08/05/19	7.3	Review discovery and identify exhibits for deposition	Bank of America	TC	371.2
08/06/19	3.0	Strategy meeting with JM to discuss deposition	Bank of America	TC	374.2
08/07/19	1.8	Review and comment on deposition outline	Bank of America	TC	376.0
08/07/19	2.7	Research and comment on issues from deposition	Bank of America	TC	378.7
08/08/19	0.2	email counsel in related cases	Bank of America	TC	378.9
08/08/19	5.8	Review and revise opposition to MSJ	Bank of America	TC	384.7
08/08/19	0.2	Review of emails with co-counsel re MSJ opposition	Bank of America	TC	384.9
08/09/19	2.9	Review and comment on Oxrider's deposition transcript	Bank of America	TC	387.8
08/09/19	4.9	Review and comment on 30(b)(6) deposition transcript taken by NH	Bank of America	TC	392.7
08/09/19	2.6	Review and revise MSJ opposition	Bank of America	TC	395.3
08/12/19	2.0	Review of emails re chambers copies and research lodging electronic files as exhibits	Bank of America	TC	397.3
08/15/19	2.2	Review and comment on Reply ISO MSJ	Bank of America	TC	399.5
08/15/19	0.5	Meeting to discuss MSJ Reply	Bank of America	TC	400.0
08/26/19	1.9	Research for errata re compendium of declarations; review case file	Bank of America	TC	401.9
09/16/19	0.5	Review letter in response to subpoena	Bank of America	TC	402.4
09/19/19	0.1	Review email instructions re MSJ hearing binder	Bank of America	TC	402.5
09/19/19	0.2	Review of emails re CMC statemen	Bank of America	TC	402.7
09/23/19	4.7	Review file and comment for MSJ preparation	Bank of America	TC	407.4
09/23/19	0.4	Meeting re MSJ	Bank of America	TC	407.8
09/24/19	3.2	Review and comment on MSJ argument outline	Bank of America	TC	411.0
09/24/19	0.4	Review of emails re MSJ	Bank of America	TC	411.4
09/25/19	0.6	Review and comment on MSJ argument outline	Bank of America	TC	412.0
09/25/19	1.8	Meet with JM to discuss MSJ argument	Bank of America	TC	413.8
09/26/19	1.5	Review file for MSJ hearing	Bank of America	TC	415.3
09/26/19	0.9	Research and review statement of recent decision re Naranjo	Bank of America	TC	416.2
09/26/19	1.5	Research and comment re reply to statement of recent decision	Bank of America	TC	417.7
09/27/19	1.6	Research and revise response to statement of recent decision	Bank of America	TC	419.3
09/30/19	0.5	Review and comment response to administrative motion to enlarge opposition	Bank of America	TC	419.8
10/11/19	4.4	Review and comment on opposition to motion for class certification	Bank of America	TC	424.2
10/12/19	8.3	Review and research re opposition and supporting documents filed under seal	Bank of America	TC	432.5
10/14/19	1.0	Meeting to discuss opposition to motion for class certification	Bank of America	TC	433.5
10/14/19	0.3	Review emails to experts re opposition to motion for class certification	Bank of America	TC	433.8
10/14/19	0.2	Call with survey expert	Bank of America	TC	434.0
10/14/19	0.3	Call with data expert	Bank of America	TC	434.3
10/14/19	0.3	Review of emails re opposition to motion for class certification	Bank of America	TC	434.6
10/14/19	2.8	Additional research re opposition to motion for class certification	Bank of America	TC	437.4
10/15/19	0.2	Review of emails with survey expert	Bank of America	TC	437.6
10/15/19	0.3	Review of emails with OPC re discovery	Bank of America	TC	437.9
10/15/19	0.4	Meeting to discuss opposition to motion for class certification	Bank of America	TC	438.3
10/15/19	0.3	Call with data expert	Bank of America	TC	438.6
10/15/19	5.1	Review defendant's expert's declaration; reserch same	Bank of America	TC	443.7
10/16/19	3.5	Research and comments re defendant's expert's declaration	Bank of America	TC	447.2
10/16/19	0.4	Review of emails re reply motion for class certification	Bank of America	TC	447.6
10/17/19	0.5	Review of emails re reply motion for class certification	Bank of America	TC	448.1
10/17/19	0.2	Review of emails with OPC re discovery	Bank of America	TC	448.3
10/17/19	8.2	Research re reply motion for class certification	Bank of America	TC	456.5
10/18/19	0.3	Meeting to discuss reply motion for class certification	Bank of America	TC	456.8
10/18/19	0.5	Review of emails re reply motion for class certification	Bank of America	TC	457.3
10/18/19	5.3	Review and revise reply motion for class certification	Bank of America	TC	462.6
10/21/19	0.2	Review of emails with OPC re discovery	Bank of America	TC	462.8

10/21/19	8.0	Research and comment re reply motion for class certification	Bank of America	TC	470.8
10/21/19	0.4	Meeting to discuss reply motion for class certification	Bank of America	TC	471.2
10/22/19	1.9	Review expert's report; review email to expert re same	Bank of America	TC	473.1
10/22/19	0.2	Review of emails with OPC re discovery	Bank of America	TC	473.3
10/22/19	4.8	Reviw and comment re reply motion for class certification	Bank of America	TC	478.1
10/23/19	0.4	Review of emails re reply motion for class certification	Bank of America	TC	478.5
10/23/19	0.3	Meeting to discuss reply motion for class certification	Bank of America	TC	478.8
10/23/19	3.8	Review and revise reply motion for class certification	Bank of America	TC	482.6
10/23/19	4.8	Research and revise reply motion for class certification	Bank of America	TC	487.4
10/24/19	3.4	Review and comment re Padilla's deposition transcript	Bank of America	TC	490.8
10/24/19	3.0	Review and comment re expert report	Bank of America	TC	493.8
10/24/19	5.9	Review and revise reply motion for class certification	Bank of America	TC	499.7
10/25/19	2.5	Review and comment on survey expert's report	Bank of America	TC	502.2
10/25/19	3.0	Review and comment on data expert's report	Bank of America	TC	505.2
10/25/19	0.3	Review of emails re finalizing reply brief	Bank of America	TC	505.5
10/25/19	2.4	Review and comment re expert reports	Bank of America	TC	507.9
10/25/19	9.3	Review and comment re reply motion for class certificaion	Bank of America	TC	517.2
10/25/19	0.2	Review of emails with survey expert	Bank of America	TC	517.4
10/28/19	0.3	Review of emails re filing and courtesy copies	Bank of America	TC	517.7
10/31/19	1.0	Review file and comment re CMC statement; email to re same	Bank of America	TC	518.7
10/31/19	1.9	Research and comment re MSJ ruling in Suarez	Bank of America	TC	520.6
10/31/19	0.3	Review of emails re MSJ ruling in Suarez	Bank of America	TC	520.9
10/31/19	1.5	Review and comment re MSJ ruling in Frausto	Bank of America	TC	522.4
10/31/19	0.3	Review of emails re MSJ ruling in Frausto	Bank of America	TC	522.7
11/01/19	5.4	Research and comment on MSJ rulings	Bank of America	TC	528.1
11/01/19	0.3	Review of emails re MSJ rulings	Bank of America	TC	528.4
11/04/19	4.8	Review file and research authorities re class certification hearing binder	Bank of America	TC	533.2
11/04/19	5.6	Research and comment re oral argument outline and notes	Bank of America	TC	538.8
11/05/19	3.6	Review and comment re oral argument outline and notes	Bank of America	TC	542.4
11/06/19	0.9	Review and comment re revisions re oral argument outline	Bank of America	TC	543.3
11/06/19	6.2	Review and comment oral argument outline and notes	Bank of America	TC	549.5
11/07/19	3.0	Meeting to discuss hearing	Bank of America	TC	552.5
11/14/19	0.2	Review of emails re subpoena	Bank of America	TC	552.7
11/15/19	1.4	Review transcript hearing on class certification	Bank of America	TC	554.1
12/03/19	0.5	Review class certification order	Bank of America	TC	554.6
12/03/19	0.8	Review of emails re class certification order	Bank of America	TC	555.4
12/03/19	1.5	Meetings re class certification order	Bank of America	TC	556.9
12/04/19	0.5	Review news articles discussing class certification order	Bank of America	TC	557.4
12/04/19	0.5	Review of emails re class certification order	Bank of America	TC	557.9
12/04/19	0.3	Meetings re class certification order	Bank of America	TC	558.2
12/05/19	0.2	Review of emails re class certification order	Bank of America	TC	558.4
12/10/19	0.2	Review email to re scheduling conference call	Bank of America	TC	558.6
12/10/19	0.1	Review email survey expert	Bank of America	TC	558.7
12/11/19	0.2	Call with data expert	Bank of America	TC	558.9
12/11/19	0.1	Review of emails with OPC re class definition	Bank of America	TC	559.0
12/11/19	1.0	Meeting to discuss class definition	Bank of America	TC	560.0
12/11/19	6.5	Research and comment re class definition	Bank of America	TC	566.5
12/12/19	0.2	Review call notes with OPC re class definition	Bank of America	TC	566.7
12/18/19	4.2	Review and research re 23(f) petition	Bank of America	TC	570.9
12/18/19	0.6	Meeting to discuss 23(f) petition	Bank of America	TC	571.5
12/18/19	4.9	Research re opposition to 23(f); review email to team re same	Bank of America	TC	576.4
12/23/19	0.2	Review email to RD re 23(f) petition	Bank of America	TC	576.6
12/26/19	0.2	Review streamlined request for extension of time to oppose 23(f) petition	Bank of America	TC	576.8
12/26/19	0.2	Review email re extension of time to file opposition	Bank of America	TC	577.0
12/26/19	2.2	Research re motion to extend time to file opposition	Bank of America	TC	579.2
12/26/19	4.8	Research re motion to extend time to file opposition; review email to RD re same	Bank of America	TC	584.0
12/26/19	0.3	Review of emails re 23(f) opposition	Bank of America	TC	584.3
12/30/19	0.2	Review and comment re email from OPC re class definition	Bank of America	TC	584.5
01/07/20	6.5	Research, review and revise opposition to 23(f) petition	Bank of America	TC	591.0
01/07/20	0.2	Review of emails re 23(f) opposition	Bank of America	TC	591.2
01/08/20	3.4	Review and revise 23(f) opposition	Bank of America	TC	594.6
01/08/20	2.0	Review of emails re 23(f) opposition	Bank of America	TC	596.6
01/08/20	0.3	Meeting to discuss 23(f) petition	Bank of America	TC	596.9

01/09/20	3.8	Review and revise 23(f) opposition	Bank of America	TC	600.7
01/09/20	0.5	Review of emails re 23(f) opposition	Bank of America	TC	601.2
01/10/20	4.3	Research, review and revise 23(f) opposition	Bank of America	TC	605.5
01/10/20	0.3	Review of emails re 23(f) opposition	Bank of America	TC	605.8
01/10/20	3.3	Review and revise 23(f) opposition	Bank of America	TC	609.1
01/17/20	0.1	Review email to re class definition	Bank of America	TC	609.2
01/22/20	0.2	Review and comment re review of emails re class definition	Bank of America	TC	609.4
01/24/20	0.7	Review of file re joint CMC statement; review email to re same	Bank of America	TC	610.1
01/24/20	0.5	Review and revise joint CMC statement; review email re same	Bank of America	TC	610.6
01/24/20	0.2	Call with OPC re CMC statement	Bank of America	TC	610.8
01/30/20	0.3	Call with counsel in related case	Bank of America	TC	611.1
01/30/20	0.1	Review email to co-counsel re mediation	Bank of America	TC	611.2
01/30/20	0.2	Review and comment to email from OPC	Bank of America	TC	611.4
02/03/20	0.2	Review email re mediation	Bank of America	TC	611.6
02/05/20	0.3	Call with counsel in related case	Bank of America	TC	611.9
02/05/20	0.1	Review email to counsel in related cases	Bank of America	TC	612.0
02/05/20	1.5	Review and review stipulation; review of emails with OPC re same	Bank of America	TC	613.5
02/05/20	0.3	Review of emails re mediation	Bank of America	TC	613.8
02/07/20	0.4	Call with counsel in related case	Bank of America	TC	614.2
02/07/20	0.3	Meeting to discuss call with counsel in related case	Bank of America	TC	614.5
02/12/20	0.2	Review of emails re mediation	Bank of America	TC	614.7
02/14/20	0.1	Review of emails re mediation	Bank of America	TC	614.8
02/15/20	1.3	Review and comment re review of emails re mediation	Bank of America	TC	616.1
02/19/20	0.2	Review of emails re mediation	Bank of America	TC	616.3
02/21/20	2.9	Review and comment to emails re mediation	Bank of America	TC	619.2
02/21/20	0.2	Review and comment to email from OPC re mediation	Bank of America	TC	619.4
02/24/20	0.1	Review of emails with mediator's office	Bank of America	TC	619.5
02/24/20	0.5	Meeting to discuss mediation	Bank of America	TC	620.0
02/27/20	0.3	Meeting to discuss denial of 23(f) petition	Bank of America	TC	620.3
03/02/20	0.2	Review of emails with counsel in related case	Bank of America	TC	620.5
03/03/20	4.3	Review file and research re mediation brief	Bank of America	TC	624.8
03/04/20	6.2	Review and revise mediation brief	Bank of America	TC	631.0
03/05/20	4.9	Review and revise mediation brief; review email to team	Bank of America	TC	635.9
03/05/20	2.5	Review and revise mediation brief; review email to co-counsel	Bank of America	TC	638.4
03/06/20	4.7	Review and revise mediation brief; review email to mediator re same	Bank of America	TC	643.1
03/09/20	0.3	Review mediation brief in related case	Bank of America	TC	643.4
03/10/20	2.0	Meeting to discuss mediation	Bank of America	TC	645.4
03/26/20	0.1	Review of emails re rescheduling mediation	Bank of America	TC	645.5
03/28/20	0.2	Review of emails re rescheduling mediation	Bank of America	TC	645.7
03/30/20	0.2	Review of emails re rescheduling mediation	Bank of America	TC	645.9
03/31/20	0.3	Review of emails re rescheduling mediation	Bank of America	TC	646.2
04/01/20	0.3	Review of emails re rescheduling mediation	Bank of America	TC	646.5
04/29/20	0.1	Review of emails re rescheduling mediation	Bank of America	TC	646.6
05/07/20	0.2	Call with counsel in related case	Bank of America	TC	646.8
06/17/20	0.1	Review email from mediator	Bank of America	TC	646.9
06/22/20	0.2	Review of emails with counsel in related case	Bank of America	TC	647.1
06/23/20	0.2	Review of emails with counsel in related case	Bank of America	TC	647.3
06/25/20	0.1	Review of emails with counsel in related case	Bank of America	TC	647.4
07/09/20	0.1	Review of emails with counsel in related case	Bank of America	TC	647.5
07/13/20	1.0	Review new mediation data	Bank of America	TC	648.5
07/13/20	0.1	Review email to expert re mediation data	Bank of America	TC	648.6
07/13/20	0.2	Call with expert re mediation data	Bank of America	TC	648.8
07/13/20	0.3	Review of emails with expert re mediation data	Bank of America	TC	649.1
07/14/20	0.5	Review expert report; review email tiexpert re same	Bank of America	TC	649.6
07/15/20	0.2	Review of emails with mediator	Bank of America	TC	649.8
07/16/20	0.3	Review of emails with counsel in related case	Bank of America	TC	650.1
07/16/20	4.4	Review and revise mediation brief	Bank of America	TC	654.5
07/17/20	0.3	Call with mediator re case	Bank of America	TC	654.8
07/17/20	3.9	Review and revise mediation brief	Bank of America	TC	658.7
07/20/20	5.0	Review and comment on mediation brief	Bank of America	TC	663.7
07/20/20	0.3	Review of emails re mediation brief	Bank of America	TC	664.0
07/21/20	0.2	Review of emails re mediation	Bank of America	TC	664.2
07/21/20	0.6	Conference call re mediation strategy	Bank of America	TC	664.8
07/22/20	8.6	Review file re mediation preparation	Bank of America	TC	673.4

07/22/20	0.2	Review of emails with expert re report	Bank of America	TC	673.6
07/23/20	3.0	Mediation	Bank of America	TC	676.6
07/27/20	0.4	Meeting to discuss post-mediation strategy	Bank of America	TC	677.0
07/28/20	4.0	Research re class definition	Bank of America	TC	681.0
07/29/20	3.9	Research re class definition	Bank of America	TC	684.9
07/29/20	0.3	Review of emails re class definition	Bank of America	TC	685.2
07/30/20	0.2	Review of emails re class definition	Bank of America	TC	685.4
07/31/20	0.2	Review of emails re class definition	Bank of America	TC	685.6
08/03/20	0.2	Review memo re class definition; review email re same	Bank of America	TC	685.8
08/05/20	0.2	Review of emails re class definition	Bank of America	TC	686.0
08/11/20	0.1	Review of emails with declarant	Bank of America	TC	686.1
08/11/20	0.2	Review of emails re class definition	Bank of America	TC	686.3
08/12/20	0.5	Meeting re class definition	Bank of America	TC	686.8
08/26/20	0.3	Meeting re class definition	Bank of America	TC	687.1
09/03/20	0.2	Review of emails re class definition	Bank of America	TC	687.3
09/08/20	0.2	Review of emails re class definition	Bank of America	TC	687.5
09/09/20	0.1	Review of emails re class definition	Bank of America	TC	687.6
09/10/20	0.4	Review of emails re class definition	Bank of America	TC	688.0
09/17/20	5.4	Research and revise questionnaire for declarations re class definition	Bank of America	TC	693.4
09/18/20	0.2	Review of emails re class definition	Bank of America	TC	693.6
09/21/20	0.4	Meeting re class definition	Bank of America	TC	694.0
09/24/20	0.3	Review of emails re class definition	Bank of America	TC	694.3
09/30/20	0.3	Review of emails re class definition	Bank of America	TC	694.6
10/01/20	4.8	Research re class member declarations re work at call centers	Bank of America	TC	699.4
10/01/20	0.3	Review of emails re class definition	Bank of America	TC	699.7
10/05/20	0.2	Review of emails re new declarations	Bank of America	TC	699.9
10/06/20	0.3	Review of emails re new declarations	Bank of America	TC	700.2
10/07/20	0.1	Review email from co-counsel re class definition	Bank of America	TC	700.3
10/07/20	0.2	Review of emails re new declarations	Bank of America	TC	700.5
10/12/20	0.1	Review of emails re new declarations	Bank of America	TC	700.6
10/13/20	0.3	Review of emails re new declarations	Bank of America	TC	700.9
10/14/20	1.5	Review file for CMC statement; review email re same	Bank of America	TC	702.4
10/15/20	0.2	Review of emails re cmc statement	Bank of America	TC	702.6
10/15/20	1.0	Review and revise CMC statement	Bank of America	TC	703.6
10/21/20	0.2	Review of emails re new declarations	Bank of America	TC	703.8
10/22/20	0.2	Review of emails re new declarations	Bank of America	TC	704.0
10/26/20	1.0	Review and revise declaration	Bank of America	TC	705.0
10/26/20	0.2	Review of emails re new declarations	Bank of America	TC	705.2
01/12/21	0.5	Review and revise CMC statement; Review email re same	Bank of America	TC	705.7
01/14/21	0.2	Review and comment re CMC statement	Bank of America	TC	705.9
02/03/21	0.3	Review of emails re class definition	Bank of America	TC	706.2
02/04/21	4.7	Research re motion for reconsideration	Bank of America	TC	710.9
02/11/21	0.3	Review of emails re motion for reconsideration	Bank of America	TC	711.2
04/01/21	0.2	Review of emails re supplemental initial disclosures	Bank of America	TC	711.4
04/01/21	2.3	Review and revise motion for reconsideration	Bank of America	TC	713.7
04/01/21	3.0	Research and comment re motion for reconsideration	Bank of America	TC	716.7
04/01/21	0.5	Meeting re motion for reconsideration	Bank of America	TC	717.2
04/05/21	0.2	Review of emails with RD re motion for reconsideration	Bank of America	TC	717.4
04/06/21	3.7	Review and revise motion for reconsideration; review email to co-counsel re same	Bank of America	TC	721.1
04/07/21	0.2	Review of emails re plaintiffs' motion for reconsideration	Bank of America	TC	721.3
04/07/21	4.3	Review and revise motion for reconsideration	Bank of America	TC	725.6
04/08/21	3.8	Review and revise motion for reconsideration	Bank of America	TC	729.4
04/12/21	0.2	Review of emails re defendant's motion for reconsideration	Bank of America	TC	729.6
04/22/21	0.1	Review of emails re defendant's motion for reconsideration	Bank of America	TC	729.7
04/22/21	1.0	Review defendant's opposition to plaintiff's motion for reconsideration	Bank of America	TC	730.7
04/22/21	3.3	Review and revise opposition to defendant's motion for reconsideration; review email RD re same	Bank of America	TC	734.0
04/23/21	2.5	Review and revise opposition to defendant's motion for reconsideration	Bank of America	TC	736.5
04/23/21	0.1	email co-counsel re opposition to motion for reconsideration	Bank of America	TC	736.6
04/27/21	0.9	Review co-counsel's edits to opposition	Bank of America	TC	737.5
04/27/21	0.2	Review of emails re motion for reconsideration	Bank of America	TC	737.7
04/27/21	1.0	Review and revise opposition to motion for reconsideration	Bank of America	TC	738.7
04/28/21	0.3	Review of emails re opposition to motion for reconsideration	Bank of America	TC	739.0

04/28/21	0.2	Review email toco-counsel re opposition to motion for reconsideration	Bank of America	TC	739.2
04/28/21	3.1	Review and revise opposition to motion for reconsideration	Bank of America	TC	742.3
04/29/21	0.4	Review of emails re opposition to motion for reconsideration	Bank of America	TC	742.7
04/29/21	2.0	Review and comment re opposition to motion for reconsideration	Bank of America	TC	744.7
05/20/21	1.0	Review defendant's reply re motion for reconsideration	Bank of America	TC	745.7
05/21/21	0.1	Review of emails re defendant's reply	Bank of America	TC	745.8
06/14/21	3.6	Review file re motion for reconsideration preparation	Bank of America	TC	749.4
06/15/21	2.5	Reivew and comment re motion for reconsideration	Bank of America	TC	751.9
06/16/21	3.9	Review and comment re motion for reconsideration	Bank of America	TC	755.8
06/17/21	2.0	Review and comment re motion for reconsideration	Bank of America	TC	757.8
06/17/21	0.3	Review order denying class certification	Bank of America	TC	758.1
06/17/21	0.3	Meeting re order denying class certification	Bank of America	TC	758.4
06/17/21	0.1	Review email RD re 23(f) petition	Bank of America	TC	758.5
06/17/21	6.8	Research and comment re 23(f) petition	Bank of America	TC	765.3
06/24/21	0.2	Review email co-counsel re 23(f) petition	Bank of America	TC	765.5
06/30/21	3.1	Review and revision of 23(f) petition	Bank of America	TC	768.6
06/30/21	0.3	Review of emails re 23(f) petition	Bank of America	TC	768.9
06/30/21	0.7	Meeting re 23(f) petition	Bank of America	TC	769.6
07/01/21	5.1	Review and revise 23(f) petition	Bank of America	TC	774.7
09/16/21	0.1	Review notice of change of counsel	Bank of America	TC	774.8
11/09/21	0.2	Review and comment re email from OPC	Bank of America	TC	775.0
10/10/21	0.5	Review and comment re CMC statement	Bank of America	TC	775.5
11/11/21	0.1	Review email to expert re Ferra issue	Bank of America	TC	775.6
11/11/21	0.1	Review of emails re revised CMC statement	Bank of America	TC	775.7
11/16/21	1.0	Review expert's report; review email to expert re same	Bank of America	TC	776.7
01/18/22	0.3	Review and comment re emails from OPC	Bank of America	TC	777.0
01/19/22	0.2	Conference call with OPC	Bank of America	TC	777.2
01/20/22	0.8	Review and comment re CMC statement	Bank of America	TC	778.0
01/20/22	0.2	Review of emails with OPC re mediation	Bank of America	TC	778.2
01/21/22	0.2	Review of emails with mediator	Bank of America	TC	778.4
01/27/22	0.2	Review of emails with expert	Bank of America	TC	778.6
03/07/22	1.0	Review expert report; review email toexpert re same	Bank of America	TC	779.6
03/08/22	0.5	Review expert's revised report	Bank of America	TC	780.1
03/14/22	0.3	Review of emails with mediator	Bank of America	TC	780.4
03/15/22	0.1	Review of emails with OPC re mediation	Bank of America	TC	780.5
03/15/22	0.2	Review of emails with mediator	Bank of America	TC	780.7
07/18/22	0.1	Review email re mediation data	Bank of America	TC	780.8
07/22/22	0.1	Review of emails with expert	Bank of America	TC	780.9
07/26/22	0.1	Review email from OPC re mediation data	Bank of America	TC	781.0
07/26/22	0.3	Review of emails with expert re report	Bank of America	TC	781.3
07/28/22	0.3	Call with expert re data.	Bank of America	TC	781.6
07/29/22	0.2	Review of emails with expert re report	Bank of America	TC	781.8
07/31/22	8.8	Research and comment re mediation brief	Bank of America	TC	790.6
08/01/22	3.8	Review file and comment re mediation	Bank of America	TC	794.4
08/02/22	5.6	Mediation	Bank of America	TC	800.0
08/04/22	0.8	Review and revise long form settlement agreement; review email re same	Bank of America	TC	800.8
09/29/22	0.1	Review email to re long form	Bank of America	TC	800.9
10/07/22	0.1	Review email to re long form	Bank of America	TC	801.0
10/18/22	0.2	Review of emails re long form settlement agreement	Bank of America	TC	801.2
11/08/22	0.2	Review of emails re long form settlement agreement	Bank of America	TC	801.4
12/05/22	0.6	Research and comment class notice; review email re same	Bank of America	TC	802.0
12/06/22	0.1	Review of emails re long form settlement agreement	Bank of America	TC	802.1
01/05/23	0.7	Review and revise long form, notice, and amended complaint	Bank of America	TC	802.8
01/05/23	0.2	Review email re latest drafts	Bank of America	TC	803.0
01/17/23	0.1	Review of emails re long form settlement agreement	Bank of America	TC	803.1
01/24/23	1.0	Review and revise long form, notice, and amended complaint	Bank of America	TC	804.1
01/26/23	0.2	Review of emails re revised drafts	Bank of America	TC	804.3
02/21/23	0.1	Review of emails re revised drafts	Bank of America	TC	804.4
03/27/23	0.1	Review of emails re revised drafts	Bank of America	TC	804.5
03/30/23	0.2	Review of emails re revised drafts	Bank of America	TC	804.7
04/26/23	0.1	Review of emails re revised drafts	Bank of America	TC	804.8
04/27/23	0.1	Review of emails re revised drafts	Bank of America	TC	804.9
04/28/23	0.2	Review of emails re revised drafts	Bank of America	TC	805.1

05/24/23	4.3	Research and comments re motion for preliminary approval and related documents	Bank of America	TC	809.4
05/25/23	4.2	Research and comments re motion for preliminary approval and related documents	Bank of America	TC	813.6
05/31/23	0.5	Review OPC's edits to motion for preliminary approval and related documents	Bank of America	TC	814.1
06/01/23	2.9	Review and revise motion for preliminary approval and related documents	Bank of America	TC	817.0
07/26/23	2.0	Prepare for motion for preliminary approval	Bank of America	TC	819.0
09/07/23	0.2	Review order granting preliminary approval	Bank of America	TC	819.2
09/07/23	0.1	Review of emails re order granting preliminary approval	Bank of America	TC	819.3
09/08/23	0.3	Review email to administrator re order granting preliminary approval	Bank of America	TC	819.6
09/10/23	0.2	Reivew email to administrator re order granting preliminary approval	Bank of America	TC	819.8
09/12/23	0.1	Review emails with administrator	Bank of America	TC	819.9
10/06/23	1.0	Research re escalator; review of emails with OPC re same	Bank of America	TC	820.9
10/11/23	0.3	Call with administrator	Bank of America	TC	821.2
10/11/23	0.1	Review emails with administrator	Bank of America	TC	821.3
10/12/23	0.1	Review emails with administrator	Bank of America	TC	821.4
10/13/23	0.1	Review emails with administrator	Bank of America	TC	821.5
10/27/23	0.1	Review of weekly administration report	Bank of America	TC	821.6
11/03/23	0.1	Review of weekly administration report	Bank of America	TC	821.7
11/10/23	0.1	Review of weekly administration report	Bank of America	TC	821.8

CONFIDENTIAL and WORK PRODUCT - BRADFORD SMITH TIMESHEETS

Date:	Hours:	Description	Case	Atty	Case total:
11/09/23	1.2	Review case file, pleadings, mediation briefs, documents produced in disc	Bank of America	BS	1.2
11/09/23	1.6	Drafted Motion for Attorneys' Fees	Bank of America	BS	2.8
11/10/23	1.8	Drafted Motion for Attorneys' Fees	Bank of America	BS	4.6
11/10/23	1.5	Researched applicable case law and statutes	Bank of America	BS	6.1
11/10/23	0.7	Drafted Order re Motion for Fees	Bank of America	BS	6.8
11/10/23	1.5	Drafted Marquez Declaration re Motion for Fees	Bank of America	BS	8.3
11/13/23	0.9	Further researched case law and statutes	Bank of America	BS	9.2
11/13/23	1.9	Drafted Motion for Attorneys' Fees	Bank of America	BS	11.1
11/13/23	0.5	Drafted Order re Motion for Fees	Bank of America	BS	11.6
11/13/23	0.8	Drafted Marquez Declaration re Motion for Fees	Bank of America	BS	12.4
11/14/23	1.1	Drafted Motion for Attorneys' Fees	Bank of America	BS	13.5
11/14/23	0.4	Drafted Order re Motion for Fees	Bank of America	BS	13.9
11/14/23	0.5	Drafted Marquez Declaration	Bank of America	BS	14.4
11/15/23	0.4	Drafted Marquez Declaration	Bank of America	BS	14.8
11/15/23	0.7	Drafted Motion for Attorneys' Fees	Bank of America	BS	15.5
11/16/23	0.8	Further researched case law and statutes	Bank of America	BS	16.3
11/16/23	1.3	Drafted Motion for Attorneys' Fees	Bank of America	BS	17.6
11/16/23	0.6	Drafted Marquez Declaration re Motion for Fees	Bank of America	BS	18.2
11/17/23	0.8	Drafted Marquez Declaration	Bank of America	BS	19
11/17/23	0.3	Drafted Order re Motion for Fees	Bank of America	BS	19.3
11/17/23	0.7	Drafted Motion for Attorneys' Fees	Bank of America	BS	20

Exhibit 4

Wilshire Law Firm, PLC
Transaction Detail by Account
All Transactions

11/10/2023
Accrual Basis

<u>Type</u>	<u>Date</u>	<u>Num</u>	<u>Memo</u>	<u>Amount</u>	<u>Cummulative Total</u>
COS					
Expert Fees					
	4/1/2019	57202	Mediation Fee	5,950.00	5,950.00
	4/2/2019	57228	Expert Fees	10,000.00	15,950.00
	7/11/2019	58845	Expert Fees	1,025.00	16,975.00
	9/12/2019	59960	Mediation Fee	1,716.00	18,691.00
	10/28/2019	60843	Expert Fees	8,980.00	27,671.00
	1/21/2020	62461	Expert Fees	1,650.00	29,321.00
	1/21/2020	62462	Expert Fees	1,781.25	31,102.25
	2/24/2020	63259	Mediation Fee	5,187.50	36,289.75
	6/22/2020	65118	Expert Fees	5,703.75	41,993.50
	7/27/2020	65738	Expert Fees	5,512.50	47,506.00
	1/26/2022	24105	Mediation Fee	9,000.00	56,506.00
	1/28/2022	5466	Expert Fees	300.00	56,806.00
	4/13/2022	5822	Expert Fees	1,950.00	58,756.00
	8/16/2022	6602	Expert Fees	500.00	59,256.00
Total EXPERT FEES				59,256.00	59,256.00
Legal Expenses					
	2/20/2018		LWDA PAGA Fee	75.00	75.00
	3/8/2018		Court Document Retrieval	9.00	84.00
	5/16/2018		Pacer	4.10	88.10
	6/22/2018		Court Document Retrieval	8.60	96.70
	11/21/2018		CourtCall	51.00	147.70
	1/22/2019		CourtCall	51.00	198.70
	4/16/2019	57512	Investigation Services - Platt Investigations, Inc	3,998.40	4,197.10
	6/6/2019	58342	Court Reporting Services - First Legal Deposition Services	2,410.65	6,607.75
	8/12/2019	59397	Court Reporting Services - Huseby, LLC	1,015.00	7,622.75
	8/12/2019	59398	Court Reporting Services - Huseby, LLC	3,253.95	10,876.70
	11/18/2019	61238	Court Reporting Services - Echo Reporting, Inc	294.30	11,171.00
	4/30/2020	OP176478-01-01	Legal Services - UNSD Transcript Order	35.00	11,206.00
	7/20/2020	65845	Investigation Services - Stratejic, LLC	12,360.00	23,566.00
	8/4/2020		Pacer	124.20	23,690.20
	8/12/2020	66176	Legal Research - Westlaw	168.87	23,859.07
	8/21/2020	66451	Investigation Services - Stratejic, LLC	12,360.00	36,219.07
	9/8/2020	66653	Legal Research - Westlaw	2.85	36,221.92
	9/18/2020	4418158000002189202	Investigation Services - Stratejic, LLC	12,360.00	48,581.92
	10/6/2020	843117159	Legal Research - Westlaw	87.61	48,669.53
	11/4/2020	843314889	Legal Research - Westlaw	492.02	49,161.55
	2/8/2021	843791568	Legal Research - Westlaw	18.49	49,180.04
	3/10/2021	843954733	Legal Research - Westlaw	100.47	49,280.51
	4/7/2021	844116254	Legal Research - Westlaw	1.55	49,282.06
	4/7/2021	844116254	Legal Research - Westlaw	223.22	49,505.28
	5/10/2021	844307606	Legal Research - Westlaw	210.76	49,716.04
	5/10/2021	844307606	Legal Research - Westlaw	128.64	49,844.68
	5/10/2021	844307606	Legal Research - Westlaw	50.10	49,894.78
	5/10/2021	844307606	Legal Research - Westlaw	59.10	49,953.88
	5/10/2021	844307606	Legal Research - Westlaw	24.01	49,977.89
	5/10/2021	844307606	Legal Research - Westlaw	277.55	50,255.44
	6/24/2021		Legal Services - UNSD Transcript Order	72.60	50,328.04
	6/25/2021	72394	Legal Services - MK Litigation Solutions Inc Transcript Order	181.50	50,509.54
	7/7/2021	844637016	Legal Research - Westlaw	59.97	50,569.51
	7/7/2021	844637016	Legal Research - Westlaw	62.96	50,632.47
	7/7/2021	844637016	Legal Research - Westlaw	73.49	50,705.96
	7/7/2021	844637016	Legal Research - Westlaw	75.29	50,781.25
	8/6/2021	844796769	Legal Research - Westlaw	28.63	50,809.88
	8/6/2021	844796769	Legal Research - Westlaw	13.51	50,823.39
	9/8/2021	844958460	Legal Research - Westlaw	4.86	50,828.25
	9/8/2021	844958460	Legal Research - Westlaw	2.43	50,830.68
	8/4/2022		Pacer	0.40	50,831.08

	11/4/2022		Pacer	0.40	50,831.48
	6/6/2023	848413295	Legal Research - Westlaw	47.85	50,879.33
	8/7/2023		Pacer	28.58	50,907.91
Total LEGAL EXPENSES				50,907.91	50,907.91
Process Service Fees					
	2/21/2018		Attorney Services - DDS Legal Support Systems Inc.	1,463.00	1,463.00
	3/19/2018		Attorney Services - DDS Legal Support Systems Inc.	57.42	1,520.42
	4/3/2018		Attorney Services - DDS Legal Support Systems Inc.	49.00	1,569.42
	7/3/2019	22845	Attorney Services - Valpro Attorney Services, LLC	340.00	1,909.42
	7/5/2019	22984	Attorney Services - Valpro Attorney Services, LLC	128.00	2,037.42
	7/31/2019	23351	Attorney Services - Valpro Attorney Services, LLC	125.00	2,162.42
	8/30/2019	23976	Attorney Services - Valpro Attorney Services, LLC	138.00	2,300.42
	8/30/2019	23991	Attorney Services - Valpro Attorney Services, LLC	235.00	2,535.42
	8/30/2019	23997	Attorney Services - Valpro Attorney Services, LLC	135.00	2,670.42
	10/2/2019	24632	Attorney Services - Valpro Attorney Services, LLC	195.00	2,865.42
	10/10/2019	133250	Attorney Services - On-Call Legal	167.75	3,033.17
	10/10/2019	133257	Attorney Services - On-Call Legal	167.75	3,200.92
	11/4/2019	3586377	Attorney Services - DDS Legal Support Systems Inc.	94.95	3,295.87
	12/19/2019	C104035-01-01	Attorney Services - On-Call Legal	37.74	3,333.61
	4/9/2021	35901	Attorney Services - Valpro Attorney Services, LLC	155.00	3,488.61
	6/2/2023	60195	Attorney Services - Valpro Attorney Services, LLC	155.00	3,643.61
Total PROCESS SERVICE FEES				3,643.61	3,643.61
Contract Attorney Fees					
	6/6/2019	53207745	Robert Half International, Inc. - Recruitment Services	1,379.92	1,379.92
	6/6/2019	53207759	Robert Half International, Inc. - Recruitment Services	1,275.35	2,655.27
	4/22/2019	53236490	Robert Half International, Inc. - Recruitment Services	2,339.40	4,994.67
	4/22/2019	53236523	Robert Half International, Inc. - Recruitment Services	2,481.68	7,476.35
	4/22/2019	53236530	Robert Half International, Inc. - Recruitment Services	958.21	8,434.56
	4/22/2019	53236566	Robert Half International, Inc. - Recruitment Services	1,931.88	10,366.44
	4/22/2019	53236567	Robert Half International, Inc. - Recruitment Services	2,348.80	12,715.24
	4/22/2019	53236573	Robert Half International, Inc. - Recruitment Services	2,218.00	14,933.24
	4/22/2019	53236574	Robert Half International, Inc. - Recruitment Services	2,472.80	17,406.04
	4/22/2019	53236583	Robert Half International, Inc. - Recruitment Services	1,996.48	19,402.52
	4/22/2019	53236584	Robert Half International, Inc. - Recruitment Services	2,037.79	21,440.31
	4/22/2019	53236585	Robert Half International, Inc. - Recruitment Services	2,364.62	23,804.93
	4/22/2019	53236586	Robert Half International, Inc. - Recruitment Services	1,830.49	25,635.42
	4/22/2019	53236587	Robert Half International, Inc. - Recruitment Services	939.52	26,574.94
	4/22/2019	53236588	Robert Half International, Inc. - Recruitment Services	1,962.79	28,537.73
	4/25/2019	53268507	Robert Half International, Inc. - Recruitment Services	719.66	29,257.39
	4/25/2019	53302650	Robert Half International, Inc. - Recruitment Services	4,454.26	33,711.65
	4/25/2019	53302651	Robert Half International, Inc. - Recruitment Services	2,418.71	36,130.36
	4/25/2019	53302652	Robert Half International, Inc. - Recruitment Services	2,701.12	38,831.48

	4/25/2019	53302653	Robert Half International, Inc. - Recruitment Services	2,348.80	41,180.28
	4/25/2019	53302655	Robert Half International, Inc. - Recruitment Services	1,081.85	42,262.13
	4/25/2019	53302656	Robert Half International, Inc. - Recruitment Services	2,596.44	44,858.57
	4/25/2019	53302657	Robert Half International, Inc. - Recruitment Services	2,565.53	47,424.10
	4/25/2019	53302658	Robert Half International, Inc. - Recruitment Services	2,736.15	50,160.25
	4/25/2019	53302659	Robert Half International, Inc. - Recruitment Services	2,218.00	52,378.25
	4/25/2019	53302660	Robert Half International, Inc. - Recruitment Services	1,580.33	53,958.58
	6/6/2019	53331376	Robert Half International, Inc. - Recruitment Services	517.74	54,476.32
	6/6/2019	53331377	Robert Half International, Inc. - Recruitment Services	679.54	55,155.86
	6/6/2019	53331383	Robert Half International, Inc. - Recruitment Services	633.66	55,789.52
	6/6/2019	53331390	Robert Half International, Inc. - Recruitment Services	469.76	56,259.28
Total CONTRACT ATTORNEY FEES				56,259.28	56,259.28
Airfare Costs					
	9/20/2018		Airfare Cost - Southwest Airlines	452.96	452.96
	3/8/2019		Airfare Cost - Southwest Airlines	299.96	752.92
	3/8/2019		Airfare Cost - Southwest Airlines	299.96	1,052.88
	3/13/2019		Airfare Cost - Southwest Airlines	252.98	1,305.86
	3/13/2019		Airfare Cost - Southwest Airlines	255.98	1,561.84
	4/19/2019		Airfare Cost - Southwest Airlines	246.98	1,808.82
	4/28/2019		Airfare Cost - Southwest Airlines	20.00	1,828.82
	5/2/2019		Airfare Cost - Southwest Airlines	299.96	2,128.78
	5/2/2019		Airfare Cost - Southwest Airlines	299.96	2,428.74
	5/2/2019		Airfare Cost - Expedia	427.60	2,856.34
	5/6/2019		Airfare Cost - Southwest Airlines	206.00	3,062.34
	5/6/2019		Airfare Cost - Southwest Airlines	206.00	3,268.34
	5/9/2019		Airfare Cost - Jetsuitex	302.20	3,570.54
	7/4/2019		Airfare Cost - Jetsuitex	976.00	4,546.54
	7/9/2019		Airfare Cost - Jetsuitex	348.00	4,894.54
	7/12/2019		Airfare Cost - Southwest Airlines	153.96	5,048.50
	7/12/2019		Airfare Cost - Southwest Airlines	153.96	5,202.46
	7/12/2019		Airfare Cost - Southwest Airlines	153.96	5,356.42
	7/16/2019		Airfare Cost - Southwest Airlines	280.98	5,637.40
	7/16/2019		Airfare Cost - Southwest Airlines	561.96	6,199.36
	7/16/2019		Airfare Cost - Southwest Airlines	561.96	6,761.32
	7/25/2019		Airfare Cost - Jetsuitex	864.00	7,625.32
	7/28/2019		Airfare Cost - Jetsuitex	135.00	7,760.32
	9/19/2019		Airfare Cost - Jetsuitex	278.00	8,038.32
	9/19/2019		Airfare Cost - Jetsuitex	338.00	8,376.32
	9/25/2019		Airfare Cost - United Airlines	20.00	8,396.32
	9/26/2019		Airfare Cost - Jetsuitex	179.00	8,575.32
	11/3/2019		Airfare Cost - Jetsuitex	1,614.00	10,189.32
Total AIRFARE COSTS				10,189.32	10,189.32
Hotel Costs					
	4/24/2019		Hotel Cost - Hotels.com	1,018.70	1,018.70
	4/24/2019		Hotel Cost - The Fairmont	954.39	1,973.09
	4/24/2019		Hotel Cost - The Fairmont	837.14	2,810.23
	4/24/2019		Hotel Cost - The Fairmont	772.95	3,583.18
	5/2/2019		Hotel Cost - Hotels.com	800.43	4,383.61
	5/6/2019		Hotel Cost - Hotels.com	678.46	5,062.07
	7/8/2019		Hotel Cost - Hotels.com	512.00	5,574.07
	7/14/2019		Hotel Cost - Amex Fine Hotels	2,684.13	8,258.20
	9/27/2019		Hotel Cost - Oakland Marriott	448.51	8,706.71
	9/27/2019		Hotel Cost - Oakland Marriott	433.56	9,140.27
	11/4/2019		Hotel Cost - Amex Travel	1,883.31	11,023.58
	11/7/2019		Hotel Cost - Hotel Nikko	645.70	11,669.28
	11/7/2019		Hotel Cost - Hotel Nikko	525.18	12,194.46
Total HOTEL COSTS				12,194.46	10,870.30
Meal Costs					
	9/27/2018		Lunch after CMC	35.17	35.17
	5/6/2019		Lunch meeting to prepare for Plaintiff's deposition	69.64	104.81
	5/6/2019		Dinner meeting to prepare for Plaintiff's deposition	138.48	243.29
	5/7/2019		Breakfast before Plaintiff's deposition	163.87	407.16
	5/7/2019		Lunch during Plaintiff's deposition	162.18	569.34
	5/7/2019		Dinner after Plaintiff's deposition	161.77	731.11

	7/18/2019		Lunch after CMC	29.11	760.22
	7/18/2019		Lunch after CMC	29.11	789.33
	8/6/2019		Breakfast before North Carolina flight	70.94	860.27
	8/7/2020		Breakfast before North Carolina deposition	88.79	949.06
	8/7/2020		Lunch during North Carolina deposition	13.32	962.38
	11/7/2019		Lunch after hearing	85.75	1,048.13
	11/7/2019		Breakfast before hearing	52.22	1,100.35
	8/3/2022		Lunch during mediation	105.22	1,205.57
	Total MEAL COSTS			1,205.57	2,529.73
Other Costs					
	2/21/2018		Case Administration Fee for In-House Services	500.00	500.00
	7/5/2018		Postage Cost	24.70	524.70
	9/27/2018		Parking Cost - Court	18.00	542.70
	9/27/2018		Transportation Cost - Uber	54.59	597.29
	9/27/2018		Transportation Cost - Uber	47.28	644.57
	9/27/2018		Attorney Mileage Reimbursement	45.68	690.25
	4/19/2019	57575	Mailing Cost - Fedex	44.60	734.85
	4/30/2019	57769	Mailing Cost - Fedex	58.87	793.72
	5/6/2019		Transportation Cost - Uber	16.51	810.23
	5/6/2019		Transportation Cost - Uber	34.11	844.34
	5/8/2019		Transportation Cost - Uber	51.73	896.07
	5/13/2019	57954	Parking Cost - Court	35.00	931.07
	8/5/2019	59282	Mailing Cost - Fedex	107.09	1,038.16
	8/13/2019	59409	Mailing Cost - Fedex	25.74	1,063.90
	8/13/2019	59409	Mailing Cost - Fedex	38.15	1,102.05
	3/16/2020	63681	Mailing Cost - Fedex	62.69	1,164.74
	8/3/2020	65970	Mailing Cost - Fedex	49.75	1,214.49
	7/6/2021	7-423-72631	Mailing Cost - Fedex	101.00	1,315.49
	Total OTHER COSTS			1,315.49	1,315.49
TOTAL				194,971.64	194,971.64