

1 Laura L. Ho (SBN 173179)
lho@gbdhlegal.com
2 Ginger L. Grimes (SBN 307168)
ggrimes@gbdhlegal.com
3 GOLDSTEIN, BORGEN, DARDARIAN & HO
155 Grand Avenue, Suite 900
4 Oakland, CA 94612
Tel: (510) 763-9800
5 Fax: (510) 835-1417

6 *Attorneys for Plaintiffs, Settlement Class and*
7 *Collective Members, and Aggrieved Employees*

8 *[Additional counsel on following page]*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 DIMITRI DIXON and RYAN SELTZ,
12 individually, and on behalf of all others similarly
13 situated,

14 Plaintiffs,

15 vs.

16 CUSHMAN & WAKEFIELD WESTERN, INC.,
17 CUSHMAN & WAKEFIELD, INC., and
18 CUSHMAN & WAKEFIELD OF WASHINGTON
DC, INC., and DOES 1-50, inclusive,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. 3:18-cv-05813-JSC

**DECLARATION OF LAURA L. HO IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: March 31, 2022
(Final Approval Hearing)
Time: 9:00 a.m.
Dept: Courtroom E, 15TH Floor
Before: Hon. Jacqueline Scott Corley

1 Justin M. Swartz (admitted *pro hac vice*)

jms@outtengolden.com

2 Deirdre Aaron (admitted *pro hac vice*)

daaron@outtengolden.com

3 OUTTEN & GOLDEN, LLP

685 Third Avenue, 25th Floor

4 New York, NY 10017

Tel: (212) 245-1000

5 Fax: (646) 509-2060

6 Jahan C. Sagafi (SBN 227887)

jsagafi@outtengolden.com

7 Molly J. Frandsen (SBN 320094)

mfrandsen@outtengolden.com

8 OUTTEN & GOLDEN, LLP

9 One California Street, 12th Floor

San Francisco, CA 94111

10 Tel: (415) 638-8828

Fax: (415) 638-8810

11 Paolo Meireles (admitted *pro hac vice*)

pmeireles@shavitzlaw.com

12 Shavitz Law Group, P.A.

13 951 Yamato Rd, Suite 285

Boca Raton, FL 33431

14 Tel: (561) 447-8888

15 *Attorneys for Plaintiffs. Settlement Class and*
16 *Collective Members, and Aggrieved Employees*

1 I, Laura L. Ho, declare as follows:

2 1. I am a member in good standing of the Bar of the State of California and a partner at the
3 law firm of Goldstein, Borgen, Dardarian & Ho (“GBDH”), in Oakland, California. I, along with
4 Outten & Golden LLP (“O&G”) and Shavitz Law Group, P.A. (“SLG”), am counsel of record for the
5 Plaintiffs in the above-captioned matter (together, “Plaintiffs’ Counsel” or “Class Counsel”). I submit
6 this declaration in support of Plaintiffs Motion for Attorneys’ Fees and Costs. I have personal
7 knowledge of the facts set forth in this declaration and could and would testify competently to them if
8 called upon to do so.

9 2. I have submitted two declarations related to preliminary approval of the settlement
10 agreement in this case, the first on July 1, 2021 (ECF 115) and the second on August 19, 2021 (ECF
11 129). The Court granted preliminary approval of the Settlement Agreement on August 30, 2021 (ECF
12 48).

13 **I. BACKGROUND & EXPERIENCE OF GBDH**

14 3. GBDH is a plaintiffs’ complex and class action firm that was founded in 1972, in
15 Oakland, California. GBDH has a national practice. We have litigated class and collective action
16 lawsuits over the last twenty years in Arizona, Florida, Georgia, Illinois, Missouri, Minnesota,
17 Maryland, New Jersey, New York, Pennsylvania, Tennessee, and Texas, as well as California, where
18 our office is located.

19 4. GBDH long has been recognized as one of the leading plaintiffs’ class action and
20 employment litigation firms in the country. The National Law Journal listed the firm in its “A
21 National Who’s Who of the Top Lawyers in Employment Litigation.” See “Bias Law Booms,” The
22 National Law Journal (July 27, 1992) at 36 (referring to the firm as “[i]n a league of their own”).
23 Business Week published an article featuring the class action litigation our firm has accomplished,
24 referring to our firm as the “Swat Team of Bias Law.” More recently, *The Recorder*, in San Francisco,
25 listed all of the firm’s partners as among the “top attorneys” in employment law in the San Francisco
26 Bay Area. GBDH partners have been named “Northern California Super Lawyers” every year since
27 2004.
28

5. In addition to the numerous cases for which GBDH serves as class counsel, the firm submits amicus briefs to appellate courts addressing developing areas of wage and hour law. Such submissions to which I have contributed include briefs to the California Supreme Court in *Sav-On v. Superior Court*, 34 Cal. 4th 319 (2004), addressing class certification of an overtime “misclassification” case, in *Morillion v. Royal Packing Co.*, 22 Cal. 4th 575 (2000), involving definition of “hours worked” under California Labor Code, and in *Earley v. Superior Court*, 79 Cal. App. 4th 1420 (2000), addressing California’s one-wage fee shifting statute for overtime wage claims.

6. My firm’s extensive experience in the prosecution and resolution of class action employment and wage and hour litigation in California, as well as in other federal and state courts throughout the country, not only assisted Plaintiffs in successfully litigating and eventually settling this case, but this expertise also confirms that this is an outstanding result for the settlement class.

II. THE REQUESTED FEE IS REASONABLE BASED ON THE RESULTS ACHIEVED AND CONTINGENT RISK.

7. The Settlement is an outstanding result for the Plaintiffs. The Settlement provides a maximum payment of \$4,900,000.00, plus a separate payment of the employer’s share of payroll taxes for the wage portion of the settlement payment. As stated in my previous declarations, Non-California Opt-in Eligible Plaintiffs who worked as a Junior Appraiser (*Seltz*) are eligible to submit a claim to receive an average pre-tax award of \$3,885.07 and those who worked as Appraisers or Senior Appraisers (*Dixon II*) are eligible to submit a claim to receive an average pre-tax award of \$4,719.30. Those who opted into the *Seltz* FLSA action before the case was settled will receive an average pre-tax recovery of \$4,715.28 and those who opted into the *Dixon II* FLSA action before the case was settled will receive an average pre-tax recovery of \$4,809.33. California Class Members will receive an average pre-tax award of \$15,074.70, and those California Class Members who also opted into the FLSA claim will receive an average award of \$16,760.67.

8. Additionally, after these cases were filed, Cushman reclassified Junior Appraisers to non-exempt as of September 9, 2019 and changed its pay practices for employees who received recoverable draws as of January 2021, instead paying a fixed, non-recoverable annual salary and separately paying a production bonus if the amount exceeds the Appraiser’s annual salary. Thus, even

1 Appraisers who chose not to opt into the case and who worked for Cushman after it made those
2 changes have already benefitted from the filing of these lawsuits.

3 9. Cushman also promised, as part of the settlement agreement, not to enforce any of its
4 promissory notes against any participating settlement member. Based on the termination letters
5 produced by Cushman during discovery, Cushman's agreement to not enforce its promissory notes is
6 incredibly valuable to some Appraisers. In these termination letters, Cushman informed former
7 Appraisers that they owed all money advanced to them by Cushman and informed the former
8 Appraisers of their balances, including amounts as high as \$15,632.54, \$16,863.52, \$29,000.00,
9 \$30,356.52, and \$101,457.00. In a termination letter to Plaintiff Dixon, Cushman stated that Plaintiff
10 Dixon owed a draw balance of \$15,632.54 and demanded repayment.

11 10. The positive results obtained for the Class are amplified when considered against the
12 risks faced with continued litigation, including arguments by Cushman that: (i) Appraisers and Senior
13 Appraisers did not have similar compensation structures (*i.e.* promissory notes with recoverable draws
14 or guaranteed draws), as Cushman argued in opposition to Plaintiff Dixon's motion for conditional
15 certification; (ii) Plaintiff Dixon's California meal and rest period claims require individualized
16 inquiries that preclude class certification; (iii) due process entitles Cushman to cross-examine each
17 class and collective member on their job duties and to challenge their claimed overtime hours
18 necessitates mini-trials, making the class, collective, and representative actions inefficient; and (iv)
19 Junior Appraisers, Appraisers, and Senior Appraisers worked few, if any, overtime hours.

20 11. The fee request is supported by the fact that GBDH undertook the financial risk and
21 burden of prosecuting this case on a contingency basis. The firm devoted substantial resources to these
22 cases, particularly the *Dixon* cases, and we have received no payment for any of the services performed
23 or the thousands of dollars in out-of-pocket costs and expenses that my firm committed to the litigation
24 of this case. We did this, with no guarantee of repayment, because of the importance of this case and
25 the benefits it would bring to class members and the potential of recovering a fee in excess of a straight
26 hourly fee if we succeeded. Moreover, given GBDH's resources, we can take on only a limited
27 number of cases. Thus, GBDH was required to forego other financial opportunities to litigate this
28 case.

12. Additionally, Plaintiffs' Counsel's retainer agreements with Plaintiffs allowed for a one-third contingency fee arrangement.

III. THE REQUESTED FEE IS REASONABLE UNDER THE LODESTAR CROSS-CHECK

13. As a cross-check on the requested percentage-of-the-fund award, Class Counsel's lodestar confirms the appropriateness of the requested fee.

A. GBDH's Reasonable Hourly Rates

14. In addition to litigating my firm's entitlement to attorneys' fees and costs in our own cases, my firm also litigates fee applications on behalf of other counsel. Because of the importance of recovery of attorney fee awards in such cases to a plaintiffs' contingency practice firm such as mine, my firm keeps current on federal and California state law developments on the subject of attorneys' fees. Accordingly, GBDH is familiar with the prevailing market rates for leading attorneys in California for trial court, complex and class action litigation of important issues.

15. GBDH periodically establishes hourly rates for the firm's billing personnel. GBDH establishes the rates based on prevailing market rates for attorneys and law firms in the San Francisco Bay Area that have attorneys and staff of comparable skill, experience, and qualifications. GBDH obtains information concerning market rates from other attorneys in the area that have similar experience doing similar work, from information that occasionally appears in the local press and national bar publications, and in orders awarding attorneys' fees in similar cases.

16. My firm's billing rates are charged to and paid by fee-paying clients of our firm, and by defendants with whom we have settlement agreements that require monitoring, and are paid by the hour on a regular billing basis. They are also the rates we claim in our fee applications in all of our contingent, fee shifting cases. I have calculated our attorneys' fees in this matter using 2021 rates.

17. I am the lead counsel from GBDH on this litigation. I have practiced law since 1994. I have practiced law since 1994, with an emphasis in employment litigation. I have been with GBDH since October 1998, became a partner in January 2005, and became a named partner in January 2013. From October 1998 until December 2004, I was an associate at GBDH. During my time at GBDH, I have been responsible for all facets of class action employment and other complex litigation, from pre-

1 filing investigation through trial and appeal. Since approximately October 1998, I have spent most of
 2 my time representing workers in wage and hour matters and have been the lead or co-lead counsel in
 3 many class and complex actions obtaining systemic relief for employees, consumers, and voters and
 4 recouping millions of dollars on behalf of plaintiffs, including: *Wellinger v. Live Nation Worldwide,*
 5 *Inc.*, No. 19STCV04397 (L.A. Cnty. Super. Ct.) (\$550,000 wage and hour class settlement finally
 6 approved in July 2021); *Spruill v. Vox Media, Inc.*, No. 1:19-cv-00160 (D.D.C.) (\$4 million settlement
 7 of state and federal wage and hour claims across three separately filed cases approved in January
 8 2021); *Foster v. Advantage Sales & Mktg.*, No. 3:18-cv-07205-LB (N.D. Cal.) (\$1,209,652 wage and
 9 hour settlement approved in May 2020); *Yumori Kaku v. City of Santa Clara*, No. 17-CV-308056
 10 (Santa Clara Cnty. Super. Ct.) (voting rights case under the California Voting Rights Act obtaining
 11 injunctive relief following bench trial in 2018, affirmed on appeal in 2019); *Flowers v. Twilio, Inc.*,
 12 No. RG16804363 (Alameda Cnty. Super. Ct.) (certified class action challenging Twilio's practices
 13 under the California Invasion of Privacy Act, resulting in a \$10 million settlement approved in June
 14 2019); *Siciliano v. Apple, Inc.*, 2013-I-CV-257675 (Santa Clara Cnty. Super. Ct.) (a certified class
 15 action challenging Apple's practices under California's Automatic Renewal Law, resulting in a \$16
 16 million settlement in 2018); *McBain v. Behr Process Corp.*, No. RG 17855986 (Alameda Cnty. Super.
 17 Ct.) (\$5 million wage and hour settlement for 456 sales representatives finally approved in August
 18 2018); *In Re Uber FCRA Litigation*, No. 3:14-cv-05200-EMC (N.D. Cal.) (nationwide class action
 19 alleging violations of the Fair Credit Report Act and California background check law, resulting in a
 20 \$7.5 million settlement in February 2018); *Willey v. Techtronic Indus. North Am., Inc.*, No.
 21 RG16806307 (Alameda Cnty. Super. Ct.) (final approval in August 2017 for \$3.5 million settlement
 22 for 343 field representatives); *Carrillo-Hueso v. Ply Gem Indus. Inc.*, No. 34-2016-00195734-CU-OE-
 23 GDS (Sacramento Cnty. Super. Ct. June 29, 2017) (\$975,000 wage and hour settlement approved in
 24 June 2017); *Garcia v. PPG Indus., Inc.*, No. 3:15-cv-00319-WHO (N.D. Cal.) (final approval in July
 25 2016 of \$500,000 settlement for 866 non-exempt employees in California and nationwide territory
 26 managers); *Talamantes v. PPG Indus., Inc.*, No. 3:13-cv-04062-WHO (N.D. Cal.) (final approval in
 27 January 2016 of \$5 million settlement for 109 business development representatives); *Willner v.*
 28 *Manpower Inc.*, 3:11-cv-02846-JST (N.D. Cal.) (wage and hour class action settling for \$8.75 million

1 in June 2015); *Morazan v. Aramark Uniform & Career Apparel Group*, No. 4:13-cv-00936-YGR
 2 (N.D. Cal.) (\$2,750,000 class settlement approved in 2013); *Zamoral. v. Balboa Life & Casualty, LLC*,
 3 No. BC360026 (L.A. Cnty. Super. Ct.) (final approval in 2013 of up to \$6 million settlement for
 4 approximately 10,631 employees denied proper meal and rest breaks); *Garcia v. Oracle*, No. RG
 5 07321026 (Alameda Cnty. Super. Ct.) (final approval in 2012 of \$35 million settlement for 1,725
 6 software employees); *Galu v. Genentech*, No. 505266 (San Mateo Cnty. Super. Ct.) (final approval in
 7 2012 of \$2.1 million settlement for 106 foundation specialists); *Myart v. Autozone*, No. 05CC03219
 8 (Orange Cnty. Super. Ct.) (final approval in November 2011 of \$9 million settlement on behalf of
 9 hourly workers statewide); *Contreras v. Bank of America*, No. CGC-07-467749 (S.F. Cnty. Super. Ct.)
 10 (\$16.65 million settlement for 3,000 mortgage loan officers in California approved in 2010); *Meyn v.*
 11 *Peet's Coffee & Tea, Inc.*, No. RG08398070 (Alameda Cnty. Super. Ct.) (final approval in 2010 of
 12 \$2.6 million settlement for over 400 store managers); *Mousai v. E-Loan, Inc.*, No. 3:06-cv-01993-SI
 13 (N.D. Cal.) (\$13.6 million settlement in overtime class action for mortgage salespeople approved in
 14 May 2007); *Lin v. Siebel Systems, Inc.*, No. CIV 435601 (San Mateo Cnty. Super. Ct.) (final approval
 15 in 2007 for \$27.5 million class action settlement in overtime case for certified class of over 800
 16 software engineers); *Butler v. Countrywide*, No. BC 268250 (L.A. Cnty. Super. Ct.) (\$30 million class
 17 settlement for over 450 misclassified account executives approved in 2005). I have also lectured on
 18 subjects relating to class and collective actions, litigation practice and procedure, ethical issues in class
 19 actions, and the fair employment and wage and hour laws at numerous programs sponsored by the
 20 American Bar Association, the National Employment Lawyers' Association, the California
 21 Employment Lawyers' Association, the Practicing Law Institute, and the Impact Fund, among others.
 22 My 2021 rate is \$990 per hour.

23 a. Megan Ryan is a former GBDH associate who graduated from the University of
 24 San Francisco School of Law in 2008. Prior to joining GBDH, Ms. Ryan worked as a consumer
 25 justice staff attorney for East Bay Community Law Center. Ms. Ryan's 2021 billing rate is \$690 per
 26 hour.

27 b. Ginger Grimes is an associate who graduated from the University of California,
 28 Irvine School of Law in 2015. Ms. Grimes clerked on the State of Hawai'i Intermediate Court of

1 Appeals from 2015 to 2016 and joined GBDH as a social justice fellow in 2016. Ms. Grimes became
 2 an associate at the firm in 2017. The 2021 billing rate for Ms. Grimes is \$565 per hour.

3 c. Alan Romero is a former GBDH associate who graduated from Columbia Law
 4 School in 2016. Prior to joining GBDH, Mr. Romero worked for Sidley Austin LLP.

5 d. Beth Holtzman is a former GBDH associate who graduated from Northwestern
 6 University School of Law in 2017. Prior to joining GBDH, Ms. Holtzman was a legal fellow for
 7 Alliance for Justice and a legal fellow for Essential Access Health. Ms. Holtzman's 2021 rate is \$515
 8 per hour.

9 e. Reynaldo Fuentes graduated from the University of California, Berkeley Law in
 10 2019. Mr. Fuentes' 2021 rate is \$465 per hour.

11 f. Scott G. Grimes is a statistician at GBDH. He has a master's degree in statistics
 12 and also has over 30 years of case management and complex litigation experience. His 2021 rate for
 13 his work as a statistician is \$390 per hour. His 2021 rate for his work as a senior paralegal is \$365 per
 14 hour.

15 g. Jacqueline Thompson is a senior paralegal at GBDH. She has over 30 years of
 16 case management and complex litigation experience. Her 2021 rate is \$365 per hour.

17 h. Stuart Kirkpatrick is a former paralegal at GBDH and has had seven years of
 18 complex litigation experience. His 2021 rate is \$350 per hour.

19 i. Damon Valdez is a paralegal at GBDH and has worked as a paralegal since 1991
 20 and as a complex litigation paralegal since 2003. His 2021 rate is \$350 per hour.

21 j. Gouri Chakraborty is a case clerk at GBDH. Her 2021 rate is \$275 per hour.

22 18. These rates are consistent with, if not lower than, the rates charged by comparable
 23 attorneys in the San Francisco Bay Area and numerous other locales within California for similar class
 24 action work and complex litigation, including particular firms that regularly prosecute or defend
 25 employment class actions and other complex litigation. We have determined that the rates we charge
 26 are reasonable for attorneys of our experience, reputation and expertise practicing complex and class
 27 action litigation in the San Francisco Bay Area.

19. Additionally, GBDH's hourly rates have been approved in both state and federal courts in recent years. GBDH's 2020 rates were approved in *Lashbrook v. City of San Jose*, No. 5:20-cv-01236-NC (N.D. Cal. Sept. 2, 2020), ECF No. 25 (ruling that they were "within the market range of hourly rates charged by attorneys of comparable experience, reputation, and ability for similar litigation"). GBDH's 2019 rates were approved in *Nevarez v. Forty Niners Football Company, LLC*, No. 5:16-cv-07013-LHK (N.D. Cal. Jul. 23, 2020), ECF No. 416 (awarding full lodestar, adjusted by an upward multiplier of 1.124) and *Flowers v. Twilio, Inc.*, No. RG16804363 (Alameda Cnty. Super. Ct. June 13, 2019). GBDH's 2018 rates were approved in *Yumori Kaku v. City of Santa Clara*, No. 17-CV-319862 (Santa Clara Cnty. Super. Ct. Jan. 22, 2019) (finding GBDH's hourly rates to be reasonable and "comparable to rates charged by other local attorneys with specialized skills that are necessary for litigating complex cases involving novel issues") and *Siciliano v. Apple, Inc.*, No. 2013-I-CV-257675 (Santa Clara Cnty. Super. Ct. Nov. 2, 2018) (approving GBDH's 2018 rates as reasonable in contested lodestar fee award). GBDH's 2017 rates were approved in *Bailey v. Redfin Corp.*, No. BC512191 (L.A. Cnty. Super. Ct. Mar. 23, 2018) (approving GBDH's 2017 rates as "reasonable and commensurate with the prevailing rates for wage and hour class actions"); *Easton v. Handy Tech., Inc.*, No. 37-2016-00004419-CU-OE-CTL (San Diego Cty. Super. Ct. Jan. 12, 2018) (same); *Willey v. Techtronic Indus. N. Am.*, No. RG 16806307 (Alameda Cnty. Super. Ct.); and *Carrillo-Hueso v. Ply Gem Indus. Inc.*, No. 34-2016-00195734-CU-OE-GDS (Sacramento Cnty. Super. Ct. June 29, 2017). GBDH's 2016 rates were approved in *Reynoldson v. City of Seattle*, No. 2:15-cv-01608-BJR (W.D. Wash. Nov. 1, 2017) and *Barnes v. Sprig, Inc.*, No. CGC-15-548154 (S.F. Cnty. Super. Ct. Dec. 20, 2016). GBDH's 2015 rates were approved in *Willits v. City of Los Angeles*, No. 2:10-cv-05782-CBM-MRW (C.D. Cal. Aug. 25, 2016). They were also implicitly approved in *Talamantes v. PPG Indus., Inc.*, No. 13-cv-4062-WHO (N.D. Cal. Jan. 6, 2016), ECF No. 121, *Bennett v. SimplexGrinnell LP*, No. 11-cv-1854-JST (N.D. Cal. Sept. 3, 2015), ECF No. 278, and *Lee v. JPMorgan Chase & Co.*, No. 13-cv-511-JLS (C.D. Cal. Apr. 28, 2015), ECF No. 95.

B. GBDH's Reasonable Time Spent and Nature of Its Representation of the Class and Collectives.

20. All attorneys and legal staff at GBDH are instructed to maintain contemporaneous time records reflecting the time spent on this and other matters. In all instances, the time keeper indicates the date and amount of time spent on a task to one-tenth of an hour; describes the work that was performed during the indicated time period; and identifies the case to which the time should be charged. Attached as **Exhibit A** is a spreadsheet of GBDH's detailed time records for this case listed in chronological order. The names of non-Plaintiff/Opt-in Plaintiff employee witnesses have been redacted from these records to protect their privacy.

21. GBDH made every effort to litigate this matter efficiently by coordinating the work of GBDH's attorneys and paralegals, minimizing duplication, and assigning tasks in a time and cost efficient manner, based on the time keepers' experience levels and talents.

a. I was the lead attorney handling this case on behalf of GBDH. I supervised a team of attorneys and paralegals from GBDH in performing all of the work necessary to successfully litigate and negotiate the class settlement herein. I also coordinated litigation and settlement strategy with attorneys from O&G and SLG, who also serve as Class Counsel in this matter. I was involved in case investigation, editing pleadings, negotiating with co-counsel and defense counsel about coordinated discovery between *Seltz* and *Dixon*, directing and editing 216(b) briefing for the *Dixon* case and negotiating a consolidated notice schedule between *Dixon I & II*, overseeing the class notice and class member communications, editing multiple mediation briefs, overseeing damages calculations, leading settlement negotiations, negotiating the long form settlement agreement, and reviewing and revising the preliminary approval and fee motions. There was typically one other attorney from GBDH working with me on the case at any one time.

b. Reynaldo Fuentes worked on this case from May to August 2018 and was primarily responsible for drafting the initial PAGA letter, researching the potential claims based on exemption misclassification, conducting investigation interviews with Plaintiff Dixon and other Cushman employees, reviewing and analyzing Plaintiff Dixon's documents related to her employment with Cushman, and researching and drafting portions of the *Dixon I* complaint.

1 c. Alan Romero worked on this case from July through October 2018 and was
2 responsible for conducting legal research on the salary basis test, researching and drafting portions of
3 the *Dixon I* complaint, researching and drafting a supplemental PAGA letter, overseeing the filing and
4 service of the *Dixon I* complaint, and researching this Court's local rules and record with complex
5 litigation.

6 d. Megan Ryan worked on this case from November 2018 to March 2019 and was
7 responsible for reviewing and analyzing Plaintiff Dixon's documents for discovery productions.

8 e. Beth Holtzman worked on this case from June 2019 through November 2020
9 and was responsible for researching and drafting portions of the June 2019 mediation statement
10 related to California claims and exemption tests, researching similar settlements in preparation for
11 mediation, attending the June 2019 mediation, participating in strategy discussions regarding
12 coordinated discovery and 216(b) motions, drafting case management statement, drafting and
13 responding to written discovery, drafting a supplemental PAGA notice letter, participating in strategy
14 discussions regarding a separate FLSA lawsuit filed in Colorado, reviewing and analyzing documents
15 produced in discovery in *Dixon* and *Seltz*, drafting meet and confer correspondence, drafting written
16 discovery related to California claims and responses to written discovery requests to Plaintiff Dixon,
17 drafting an amended complaint in *Dixon I*, participating in discussions with co-counsel regarding the
18 strategy for 216(b) motions, communicating with Plaintiff Dixon regarding the status of the case,
19 drafting a script for investigation calls to class members, reviewing and analyzing notes and
20 documents from interview calls with class members, researching and drafting a 216(b) motion in
21 *Dixon I* and supporting documents, drafting a motion for leave to file second amended complaint,
22 drafting the *Dixon II* complaint, communicating with class and collective members, drafting a
23 stipulation regarding coordinated notice periods between *Dixon I & II* and draft notices, and
24 corresponding with opposing counsel regarding class and collective data in preparation for mediation.

25 f. Ginger Grimes has worked on this case from November 2020 through the
26 present and has been responsible for communicating with class and collective members about the
27 case, communicating with the administrator regarding settlement notice issues, overseeing the filing
28 of consent to join forms, participating in mediation strategy discussions, attending the March 2021

1 mediation, researching and drafting the motion for preliminary approval, researching and drafting
2 portions of the supplemental briefing for preliminary approval, and researching and drafting the
3 motion for attorneys' fees and costs.

4 g. Scott Grimes has been responsible for reviewing and analyzing payroll,
5 earnings, and other data produced by Cushman in conjunction with the *Dixon* 216(b) motion,
6 calculating damages for *Dixon* and *Seltz* for mediation, and for analyzing data issues in the settlement
7 process. Mr. Grimes also spent some time assisting with the preparation and filing of the *Dixon*
8 216(b) motion.

9 h. Jacqueline Thompson has been responsible for organizing and managing
10 Plaintiff Dixon's documents, calendaring case deadlines, organizing and managing court documents,
11 preparing and electronically filing court documents (*e.g.*, pleadings, briefs, stipulations, consent to
12 join forms, case management statements) and administrative documents (*e.g.* PAGA notice letters),
13 reviewing and analyzing court procedural rules, legal and fact cite checking of court-filed documents
14 and mediation briefs, correspondence with Plaintiff Dixon regarding updates in the case and important
15 documents, preparing documents for production according to the parties' ESI protocol and ingesting
16 produced document into the firm's document management systems, conducting investigation calls
17 with class and collective members and drafting memos summarizing calls, communicating with opt-in
18 plaintiffs, and communicating with class and collective members regarding the settlement.

19 i. Stuart Kirkpatrick was responsible for setting up the case in various litigation
20 software programs, ingesting and coding documents into the firm's document management systems,
21 researching potential witnesses and contact information, preparing documents for court filing and
22 electronically filing documents, calendaring litigation deadlines, assisting with certified mailings for
23 PAGA notice letters, preparing documents for production according to the parties' ESI protocol,
24 serving discovery requests and responses, assisting Plaintiff Dixon with the collection of
25 electronically stored documents, conducting investigation calls with class and collective members and
26 drafting memos summarizing calls, legal cite checking on briefs, and creating a calendar of deadlines
27 based on long form settlement agreement.

j. Damon Valdez has been responsible for conducting background research on Cushman, organizing case documents, electronically filing court documents, calendaring litigation deadlines, and communicating with class members.

k. Gouri Chakraborty has been responsible for communicating with settlement class members since the settlement notice was sent.

l. A summary of hours expended and lodestar incurred by GBDH's timekeepers through October 15, 2021 is as follows:

Professional	Title	Billable Hours	Billable Fees
Laura L. Ho	Senior Partner	283.3	\$280,467.00
Megan Ryan	Associate	31.8	\$21,942.00
Ginger Grimes	Associate	151.2	\$85,428.00
Alan Romero	Associate	53.9	\$29,106.00
Beth Holtzman	Associate	428.6	\$220,729.00
Reynaldo Fuentes	Associate	100.00	\$46,500.00
Scott Grimes	Statistician	174.5	\$68,055.00
Jacqueline Thompson	Senior Paralegal	199.8	\$72,927.00
Scott Grimes	Senior Paralegal	0.2	\$73.00
Stuart Kirkpatrick	Paralegal	119.7	\$41,895.00
Damon Valdez	Paralegal	21.4	\$7,490.00
Gouri Chakraborty	Case Clerk	1.1	\$302.50
GBDH Total:		1,565.7	\$874,984.50

22. The hours GBDH billed were properly and necessarily spent on the firm's work in litigating this class, collective, and representative action.

23. GBDH has exercised billing judgment on its recorded time twice. First, GBDH reviewed all of their time entries and eliminated vague or duplicative entries. Second, GBDH has applied an across-the-board discount of 5%. GBDH's final lodestar through October 15, 2021, after the exercise of billing judgment, is **\$831,235.28**. Together with O&G and SLG, Class Counsel's total lodestar, after the exercise of billing judgment, is \$1,687,275.06.

24. GBDH was primarily responsible for the ligation of *Dixon I & II* and the vast majority of GBDH's time spent towards the resolution of this case was on the *Dixon* cases until around

1 November 2020, as we began preparing with co-counsel for a joint, comprehensive settlement
2 covering individuals in all three cases. The following summarizes the approximate hours GBDH spent
3 on each phase of litigation:

4 a. GBDH began investigating Plaintiff Dixon's claims in the summer of 2018.
5 GBDH spent around 166.2 hours investigating Plaintiff Dixon's claims and preparing her complaint,
6 including interviewing Plaintiff Dixon, reviewing Plaintiff Dixon's employment records, conducting
7 legal research, drafting a PAGA notice letter to the LWDA, conducting interviews with other Cushman
8 Appraisers, and drafting the state court complaint.

9 b. After the complaint was filed and up until the first joint mediation between the
10 *Seltz* and *Dixon* cases, GBDH spent approximately 181.6 hours conducting further legal and factual
11 research, meeting with the *Seltz* counsel about coordination of litigation and a co-counseling
12 agreement, evaluating Cushman's removal of Plaintiff Dixon's case to federal court, preparing a
13 protective order, and serving and responding to written discovery.

14 c. In November 2018, the parties in *Seltz* and *Dixon* agreed to stay the cases
15 pending mediation. The first joint mediation took place on June 27, 2019. GBDH was responsible for
16 drafting the California claims and salary basis test sections of the mediation brief. Following the
17 unsuccessful June 2019 mediation, the parties agreed that the *Seltz* and *Dixon* cases would be
18 coordinated for discovery but remain in separate courts and in separate litigation – with the *Seltz* case
19 focused on Junior Appraisers and the *Dixon* case focused on Appraisers and Senior Appraisers. In this
20 phase of litigation, GBDH continued to pursue written discovery for information about Appraisers and
21 Senior Appraisers, drafting and submitting a supplemental PAGA notice, drafting an amended
22 complaint, strategizing with co-counsel about a newly filed case against Cushman in Colorado
23 involving Appraisers, and responding to written discovery requests to Plaintiff Dixon. GBDH spent
24 about 185.3 hours on this phase of the case following the June 2019 joint mediation.

25 d. Beginning around June 2020, GBDH also turned its attention to drafting and
26 filing a 216(b) motion contested by Cushman for the *Dixon* case, drafting and filing a reply brief to the
27 216(b) motion, preparing and filing a new case against Cushman & Wakefield, Inc. (the nationwide
28 entity), negotiating a consolidated FLSA notice schedule for the two *Dixon* cases, overseeing the two

1 *Dixon* notice and opt-in processes and interviewing class and collective members, analyzing several
 2 data sets for the *Dixon* cases in preparation for the parties' next mediation session, and drafting
 3 portions of the mediation brief related to the Appraisers and Senior Appraisers. GBDH spent about
 4 687.2 hours on this phase of litigation.

5 e. The final joint mediation session took place on March 11, 2021. Because the
 6 two *Dixon* cases encompassed a much larger part of the three cases, GBDH took the lead in the
 7 negotiations during the mediation and subsequent settlement discussions, including revising and
 8 negotiating the long form settlement agreement. GBDH also took the lead in drafting the preliminary
 9 approval papers, drafting supplemental approval papers based on the Court's tentative ruling seeking
 10 additional briefing on certain issues. After the Court gave preliminary approval, GBDH has also taken
 11 the lead in communicating with Plaintiff Dixon and *Dixon I & II* opt-in eligible plaintiffs, working
 12 with the Settlement Administrator on the settlement notice process, and preparing this motion for
 13 attorneys' fees and costs – spending about 345.4 hours for the final settlement phase of the case to
 14 date.

15 25. I estimate that getting through final approval in this case will require approximately 100
 16 more hours of work by GBDH attorneys and staff. This additional time will be spent in finalizing and
 17 filing this motion, preparing the motion for final approval, overseeing the claims administrator's notice
 18 process, responding to questions and concerns of settlement class and collective members, and
 19 appearing at the final approval hearing. Monitoring the distribution of the settlement funds will take
 20 additional time. All of these tasks are necessary and benefit the settlement class. Using a blended rate
 21 of \$575 per hour, I estimate that Class Counsel's lodestar through final approval will be \$1,744,775.06.

22 26. The three law firms will be splitting fees pro-rata by lodestar.

23 **IV. THE LITIGATION EXPENSES WERE REASONABLY INCURRED**

24 27. Class Counsel further ask the Court to approve payment of up to \$60,000 in costs,
 25 which is the maximum amount that was requested in Plaintiffs' Motion for Preliminary Approval and
 26 disclosed in the Class Notice.

27 28. As of October 15, 2021, GBDH has incurred a total of \$18,528.65 in actual costs. The
 28 costs and expenses identified below in an itemized summary based on each category of costs are

1 reflected in the accounting books and records GBDH maintains in the ordinary course of business,
 2 which are prepared from expense vouchers and check records. The costs include:

Description	Cost
Court Fees/Filing Fees/Service Fees	\$1,747.70
216(b) Notice Administration Costs	\$2,320.30
Document Management ¹	\$5,382.14
In-House Copying @ \$0.10/page	\$7.10
In-House Printing	\$290.60
In-House Postage	\$94.30
Research – Online	\$4,113.16
Travel – airline/car/mileage/taxi/gas	\$15.00
Meals	\$26.09
Telephone	\$32.26
Special Masters/Mediators/Arbitrators	\$4,500.00
GBDH Total Costs:	\$18,528.65

17 29. All costs incurred here were necessary to the prosecution of this litigation and would
 18 normally have been billed to a client paying for the firm's services on a non-contingent basis. These
 19 costs are reasonable for a case in which such a substantial recovery has been achieved for the
 20 settlement class and collective, in comparison with costs awarded by this Court and others in this
 21 district in similar matters. Class Counsel may incur additional costs in filing the instant motion,
 22 seeking final approval, and monitoring the distribution process. Combined with the costs incurred by
 23 O&G and SLG, the combined costs incurred by Class Counsel through October 15, 2021, is
 24 \$61,575.57. Class Counsel will confirm their final costs information at the final approval hearing.

27 ¹ GBDH pays a monthly service for managed services for litigation document management, and the
 28 fee increases as the volume of data stored on the cloud rises. Over the course of this case, GBDH
 ingested, manipulated, and stored around 17 GB of data.

EXHIBIT A

Date	Professional	Narrative	Hours	Rate	Amount
5/17/2018	Laura Ho	Phone call with D. Dixon and review documents re potential overtime claims.	3.0	990.00	2970.00
5/21/2018	Laura Ho	Correspondence w/ D. Dixon re follow up interview.	0.1	990.00	99.00
5/23/2018	Damon Valdez	Background research re Cushman & Wakefield	2.2	350.00	770.00
5/24/2018	Damon Valdez	Draft memo to L. Ho re Cushman & Wakefield company and litigation background research	0.9	350.00	315.00
5/25/2018	Laura Ho	Draft retainer agreement, and sign and finalize	0.4	990.00	396.00
5/25/2018	Laura Ho	Phone call w/ D. Dixon re work experience	0.5	990.00	495.00
5/25/2018	Scott Grimes	Prepare Dixon retainer for signature and transmit same	0.2	365.00	73.00
5/29/2018	Reynaldo Fuentes	Worked on PAGA letter for C&W case; met with Laura Ho about initial scope.	1.0	465.00	465.00
5/29/2018	Reynaldo Fuentes	Continued working on C&W PAGA letter; conducted general research on employee exemptions	2.0	465.00	930.00
5/29/2018	Reynaldo Fuentes	Continues work on PAGA letter	2.0	465.00	930.00
5/29/2018	Laura Ho	Correspondence w/ R. Fuentes re PAGA letter and salary basis research.	0.2	990.00	198.00
5/30/2018	Reynaldo Fuentes	Completed first draft of the PAGA letter	4.8	465.00	2232.00
5/30/2018	Reynaldo Fuentes	Line edits to PAGA letter returned with Laura Ho's edits	1.2	465.00	558.00
5/30/2018	Reynaldo Fuentes	Began reviewing cases relevant to draw compensation methods for PAGA letter.	0.3	465.00	139.50
5/30/2018	Laura Ho	Review and revise draft PAGA letter	0.5	990.00	495.00
5/31/2018	Reynaldo Fuentes	Reading cases re: administrative exemption	0.9	465.00	418.50
5/31/2018	Reynaldo Fuentes	Preparation and meeting with Laura Ho on PAGA letter and administrative exemption research	0.6	465.00	279.00
5/31/2018	Reynaldo Fuentes	Continue reading cases for PAGA letter and editing final version	4.6	465.00	2139.00
5/31/2018	Laura Ho	Conference w/ R. Fuentes re PAGA letter	0.9	990.00	891.00
6/1/2018	Reynaldo Fuentes	Began research into salary basis memo; sat in on client call with Ms. Dixon	3.0	465.00	1395.00
6/1/2018	Laura Ho	Phone call w/ R. Fuentes and D. Dixon re PAGA letter	0.8	990.00	792.00
6/1/2018	Laura Ho	Review and respond to personnel file request	0.2	990.00	198.00
6/1/2018	Jacqueline Thompson	Review and respond to email from L. Ho re setting up case and plaintiff produced documents, review email exchange between L. Ho and R.Fuentes re document production	0.3	365.00	109.50
6/4/2018	Reynaldo Fuentes	Preparing PAGA letter and personnel file request for final review	1.5	465.00	697.50
6/4/2018	Reynaldo Fuentes	Research into federal salary basis test for further litigation	0.8	465.00	372.00
6/4/2018	Reynaldo Fuentes	Final preparation for PAGA letter and personnel file submission	0.3	465.00	139.50
6/4/2018	Reynaldo Fuentes	Drafting email to send to C&W office manager for personnel file and working with Stuart on PAGA submission.	1.0	465.00	465.00
6/4/2018	Laura Ho	Revise and supervise finalizing PAGA letter and personnel file request	0.7	990.00	693.00
6/4/2018	Laura Ho	Exchange memos w/ Dixon re communications w/ managers	0.2	990.00	198.00
6/4/2018	Jacqueline Thompson	Review email exchange re manager contact for plaintiff- Cushman and Wakefield, review and respond to emails re sending PAGA letter	0.4	365.00	146.00
6/4/2018	Damon Valdez	Transmit PAGA letter to state and defendants	0.9	350.00	315.00
6/4/2018	Damon Valdez	Exchange emails w/ L. Ho re same	0.2	350.00	70.00
6/8/2018	Reynaldo Fuentes	Responding to Ms. Dixon's email request	0.2	465.00	93.00
6/8/2018	Laura Ho	Review and resopnd to R. Fuentes memo re Dixon communication w/ HR	0.2	990.00	198.00
6/11/2018	Reynaldo Fuentes	Email to Ms. Dixon on email and transferring salary information to Jacque	0.1	465.00	46.50
6/11/2018	Laura Ho	Review and respond to R. Fuentes memos re Dixon records	0.2	990.00	198.00
6/11/2018	Jacqueline Thompson	Update prolaw re case LWDA deadlines, review LWDA letter	0.6	365.00	219.00
6/13/2018	Reynaldo Fuentes	Transferred payroll information to Jacque, emailed Laura about plaintiff question, and emailed client about question regarding medical coverage.	0.2	465.00	93.00
6/13/2018	Reynaldo Fuentes	Call with Laura re: Dixon email and drafting response to Ms. Dixon	0.4	465.00	186.00
6/13/2018	Laura Ho	Conference w/ R. Fuentes re Dixon's discharge and getting more background	0.3	990.00	297.00
6/14/2018	Reynaldo Fuentes	Reviewing Dixon documentation	0.3	465.00	139.50
6/14/2018	Reynaldo Fuentes	Reviewing work emails and information sent by Ms. Dixon	1.5	465.00	697.50
6/14/2018	Laura Ho	Conference w/ R. Fuentes re Dixon leave of absence	0.3	990.00	297.00
6/14/2018	Jacqueline Thompson	Update prolaw re deadlines, conference w/ R. Fuentes re same	0.2	365.00	73.00

Date	Professional	Narrative	Hours	Rate	Amount
6/15/2018	Reynaldo Fuentes	Replying to Ms. Dixon after reviewing her email chain to pinpoint the beginning of her worker's compensation application.	0.1	465.00	46.50
6/15/2018	Reynaldo Fuentes	Drafting notes from call on June 14th re: overview of worker's comp, disability leave, and coverage issues	0.9	465.00	418.50
6/18/2018	Reynaldo Fuentes	Replying to Ms. Dixon's [REDACTED] note and confirming that she was denied a worker's compensation form.	0.2	465.00	93.00
6/18/2018	Reynaldo Fuentes	Printing, organizing and reviewing documents sent by Ms. Dixon including payroll records, email correspondence with co-workers and supervisors, and compensation agreements.	0.9	465.00	418.50
6/19/2018	Reynaldo Fuentes	Drafting response email to Ms. Dixon's replies; also confirming that she has been represented by a worker's compensation attorney.	0.1	465.00	46.50
6/20/2018	Reynaldo Fuentes	Sending responses to Dimitri re: a worker's compensation attorney and collecting notice for a deposition she was called to	0.3	465.00	139.50
6/20/2018	Jacqueline Thompson	Review and respond to email from R. Fuentes re referral	0.1	365.00	36.50
6/22/2018	Reynaldo Fuentes	Drafting email to Dimitri Dixon re: worker's compensation attorneys we can recommend to her.	0.3	465.00	139.50
6/22/2018	Stuart Kirkpatrick	Upload email and pdf files from client to Summation for attorney and paralegal review	0.9	350.00	315.00
6/22/2018	Stuart Kirkpatrick	Review and code client email and pdf files in preparation for production	0.7	350.00	245.00
6/22/2018	Reynaldo Fuentes	Researching Ms. Dixon's exempt status re: administrative exemption and salary basis test for memo	5.7	465.00	2650.50
6/25/2018	Reynaldo Fuentes	Continued researching exemption question re: Ms. Dixon. Specifically, researched the federal kick-back rule and analogous cases with recoverable draw facts	2.5	465.00	1162.50
6/26/2018	Reynaldo Fuentes	Working on research for Dixon exemption question for Laura	1.3	465.00	604.50
6/27/2018	Reynaldo Fuentes	Reviewing documents Dimitri sent to add to her file	0.2	465.00	93.00
6/27/2018	Reynaldo Fuentes	Call with Dimitri to discuss additional context and details of her employment with C&W	0.7	465.00	325.50
6/27/2018	Reynaldo Fuentes	Working on salary research memo for Ms. Dixon's exemption status issue	0.8	465.00	372.00
6/29/2018	Reynaldo Fuentes	Reviewing Ms. Dixon's explanation of disabling event for WC	0.2	465.00	93.00
7/4/2018	Reynaldo Fuentes	Drafting salary memo	9.5	465.00	4417.50
7/5/2018	Reynaldo Fuentes	Reviewing draft memo for Laura's edits	2.3	465.00	1069.50
7/9/2018	Reynaldo Fuentes	Drafting reminder email on the personnel file re: Dixon case	0.1	465.00	46.50
7/9/2018	Reynaldo Fuentes	Conversation re: complaint from Laura	0.5	465.00	232.50
7/10/2018	Reynaldo Fuentes	Confirming receipt of Dixon personnel file	0.2	465.00	93.00
7/10/2018	Reynaldo Fuentes	Transferring Dixon file to Jacque	0.1	465.00	46.50
7/19/2018	Reynaldo Fuentes	Sending personnel record to Jacque	0.3	465.00	139.50
7/19/2018	Reynaldo Fuentes	Moving Cushman files into iManage folder and reviewing summation pane with Jacque	0.3	465.00	139.50
7/19/2018	Jacqueline Thompson	Conference w/ RF document production, organization and review of plaintiff documents	0.3	365.00	109.50
7/19/2018	Reynaldo Fuentes	Reviewing Cushman personnel file	0.4	465.00	186.00
7/20/2018	Reynaldo Fuentes	Pulling complaint templates and beginning drafting	0.7	465.00	325.50
7/20/2018	Reynaldo Fuentes	Drafting the complaint in C&W	5.9	465.00	2743.50
7/20/2018	Stuart Kirkpatrick	Upload additional case materials from client to Summation Pro for J. Thompson	0.3	350.00	105.00
7/20/2018	Stuart Kirkpatrick	Create user profile and permissions for R. Fuentes to review and code documents in Summation Pro	0.2	350.00	70.00
7/20/2018	Jacqueline Thompson	Review and respond to email from R. Fuentes re complaint	0.2	365.00	73.00
7/20/2018	Jacqueline Thompson	Review and respond to emails from RF re document production, emails to S. Kirkpatrick re same	0.3	365.00	109.50
7/23/2018	Reynaldo Fuentes	Drafting first draft of Dixon complaint	3.1	465.00	1441.50
7/23/2018	Reynaldo Fuentes	Meeting with Laura and team about hand-off and next steps in C&W case	0.5	465.00	232.50
7/23/2018	Alan Romero	Meet with L. Ho and team about hand-off and next steps in C&W case	0.5	540.00	270.00
7/23/2018	Reynaldo Fuentes	Drafting note for Stu research	0.6	465.00	279.00
7/23/2018	Laura Ho	Conference w/ R. Fuentes, A. Romero about hand-off and next steps in C&W case	0.5	990.00	495.00
7/23/2018	Reynaldo Fuentes	Email update to Dimitri	0.2	465.00	93.00
7/23/2018	Stuart Kirkpatrick	Investigation and research of Dimitri Dixon and appraisers/directors at Cushman & Wakefield through PeopleMap, LinkedIn, Facebook, and other online resources, for R. Fuentes	1.0	350.00	350.00

Date	Professional	Narrative	Hours	Rate	Amount
7/23/2018	Stuart Kirkpatrick	Further research and compile list of past not current employees for L. Ho review	1.0	350.00	350.00
7/23/2018	Laura Ho	Exchange memos w/ S. Kirkpatrick re linked in profiles	0.2	990.00	198.00
7/23/2018	Jacqueline Thompson	Review and respond to emails re retainer agreement	0.2	365.00	73.00
7/23/2018	Jacqueline Thompson	Review and respond to emails from Reynaldo Fuentes re LWDA case number	0.1	365.00	36.50
7/24/2018	Laura Ho	Review potential witnesses and memo to R. Fuentes re interview process	0.4	990.00	396.00
7/24/2018	Stuart Kirkpatrick	Review [REDACTED] and [REDACTED] case files and pull class member communications and investigation questionnaires for R. Fuentes review when drafting Cushman intake script	0.5	350.00	175.00
7/24/2018	Reynaldo Fuentes	Editing first draft of the complaint	1.9	465.00	883.50
7/24/2018	Reynaldo Fuentes	Sending email to Dimitri to set up next steps call	0.1	465.00	46.50
7/24/2018	Reynaldo Fuentes	Reviewing Dimitri's personnel file	2.2	465.00	1023.00
7/25/2018	Reynaldo Fuentes	Prepping for Dimitri call	0.5	465.00	232.50
7/25/2018	Reynaldo Fuentes	Call with Dimitri to get updates on complaint drafting question (e.g., confirm that she was reimbursed for expenses; confirm if there was ever meal and rest break policy; ask about if there was ever conversation about her being exempt), provide update on litigation, and discuss names identified on Stu's potential witness list.	0.7	465.00	325.50
7/25/2018	Reynaldo Fuentes	Drafting call summary to Alan and Laura	0.5	465.00	232.50
7/25/2018	Reynaldo Fuentes	Updates to the complaint in Dixon post-call	0.7	465.00	325.50
7/25/2018	Reynaldo Fuentes	Reviewing personnel file, employment contracts; attempting to identify the nature of her compensation structure under various iterations of the employment contract, if an arbitration agreement was ever present and other information relevant to the complaint.	0.8	465.00	372.00
7/25/2018	Stuart Kirkpatrick	Research appraiser names from client to locate contact information, for R. Fuentes	0.2	350.00	70.00
7/25/2018	Reynaldo Fuentes	Edits to the complaint	2.1	465.00	976.50
7/26/2018	Reynaldo Fuentes	Pulling together witness list email and interview script for recruiting opt-ins and class members.	2.3	465.00	1069.50
7/26/2018	Reynaldo Fuentes	Working on long-form interview script	1.0	465.00	465.00
7/27/2018	Reynaldo Fuentes	Working on long-form interview intake script for Dixon	1.5	465.00	697.50
7/27/2018	Reynaldo Fuentes	Working on legal research questions for the complaint	1.8	465.00	837.00
7/27/2018	Stuart Kirkpatrick	Online research to acquire accurate phone numbers for former Cushman employees [REDACTED], for R. Fuentes case investigation calls	0.5	350.00	175.00
7/27/2018	Laura Ho	Review and revise interview scripts and Conferences w/ R. Fuentes re witness interviews	0.6	990.00	594.00
7/27/2018	Reynaldo Fuentes	Reviewing and drafting work plan for final week of work	0.4	465.00	186.00
7/27/2018	Reynaldo Fuentes	Incorporating Laura's edits on the draft witness scripts	0.5	465.00	232.50
7/27/2018	Reynaldo Fuentes	Drafting additional PAGA letter for new claims; e.g., cell phone usage	0.8	465.00	372.00
7/30/2018	Reynaldo Fuentes	Pulling together master personnel file for review	6.2	465.00	2883.00
7/30/2018	Reynaldo Fuentes	Reviewing task list	0.2	465.00	93.00
7/31/2018	Reynaldo Fuentes	Witness interview calls with names of former co-workers of Dimitri	1.6	465.00	744.00
7/31/2018	Reynaldo Fuentes	Pulling together paper files printed in the Dixon case	1.0	465.00	465.00
7/31/2018	Reynaldo Fuentes	Edited the interview script based on experience interviewing [REDACTED]	0.6	465.00	279.00
8/1/2018	Reynaldo Fuentes	Drafting interview summary from call with potential witness [REDACTED]	0.9	465.00	418.50
8/1/2018	Alan Romero	Meet with R. Fuentes re: Dixon v. C&W background binder	0.3	540.00	162.00
8/1/2018	Reynaldo Fuentes	Transition meeting with Alan re: documents and tasks for hand-off	0.5	465.00	232.50
8/1/2018	Reynaldo Fuentes	Pulling together witness files and connecting witnesses to Alan	0.4	465.00	186.00
8/1/2018	Reynaldo Fuentes	Sending Alan information on jury waiver issue	1.9	465.00	883.50
8/1/2018	Reynaldo Fuentes	Completing jury waiver memo for Alan	2.0	465.00	930.00
8/1/2018	Reynaldo Fuentes	Reviewing witness documents from [REDACTED]	1.3	465.00	604.50
8/2/2018	Alan Romero	Review case file/binder materials prepared by R. Fuentes	1.1	540.00	594.00
8/2/2018	Alan Romero	Conduct legal research re: salary basis test	0.4	540.00	216.00
8/3/2018	Alan Romero	Review case file materials in preparation for meeting with R. Fuentes	0.2	540.00	108.00
8/7/2018	Alan Romero	Review background and binder materials in preparation for meeting with L. Ho re: Dixon v. C&W complaint	2.0	540.00	1080.00
8/7/2018	Alan Romero	Meet with L. Ho re: Dixon v. C&W draft complaint assignment	0.7	540.00	378.00

Date	Professional	Narrative	Hours	Rate	Amount
8/7/2018	Alan Romero	Incorporate line edits into complaint draft	1.5	540.00	810.00
8/7/2018	Laura Ho	Conference w/ A. Romero re edits to complaint and getting ready to file	0.4	990.00	396.00
8/7/2018	Jacqueline Thompson	Review and respond to email from A. Romero re filing complaint	0.1	365.00	36.50
8/8/2018	Alan Romero	Edit and update Dixon v. C&W complaint	6.1	540.00	3294.00
8/8/2018	Alan Romero	Conduct follow-up tasks from L. Ho re: Dixon v. C&W complaint	1.8	540.00	972.00
8/8/2018	Laura Ho	Review and revise draft complaint and exchange memos w/ A. Romero re same	0.6	990.00	594.00
8/9/2018	Alan Romero	Conduct follow-up research re: venue issues	1.4	540.00	756.00
8/9/2018	Alan Romero	Participate in call with D. Dixon re: case update	0.2	540.00	108.00
8/9/2018	Alan Romero	Review agreement in preparation for call with D. Dixon	0.2	540.00	108.00
8/9/2018	Alan Romero	Participate in call D. Dixon re: settlement issue	0.1	540.00	54.00
8/9/2018	Laura Ho	Review release and exchange memos w/ D. Dixon and Conferences w/ A. Romero re same	0.4	990.00	396.00
8/9/2018	Alan Romero	Edit and update Dixon v. C&W complaint	1.0	540.00	540.00
8/9/2018	Jacqueline Thompson	Review and respond to email from A. Romero re updated PAGA letter	0.3	365.00	109.50
8/10/2018	Alan Romero	Edit Dixon v. C&W complaint	2.3	540.00	1242.00
8/10/2018	Alan Romero	Conduct research re: complaint filing issues	2.7	540.00	1458.00
8/10/2018	Jacqueline Thompson	Review and respond to email from A. Romero re PAGA letter, review case file and PAGA website re same, exchange emails and conference w/ K. Moseley and T. Rosado re same	1.0	365.00	365.00
8/10/2018	Laura Ho	Review and revise complaint, oversee filing	0.7	990.00	693.00
8/10/2018	Alan Romero	Work with paralegals to prepare complaint for filing	0.4	540.00	216.00
8/10/2018	Jacqueline Thompson	Review SF superior court local rules re filing, phone call to file and serve Xpress re initial filing, exchange emails w/ attorneys re filing requirements and filing deadline	1.5	365.00	547.50
8/11/2018	Laura Ho	Review and revise complaint and exchange memos w/ A. Romero re ctj	0.5	990.00	495.00
8/13/2018	Alan Romero	Work with paralegals to prepare Dixon v. C&W complaint for filing	1.0	540.00	540.00
8/13/2018	Jacqueline Thompson	Review and respond to email from A. Romero re cite checking complaint, prepare docsign for D. Dixon to sign	0.8	365.00	292.00
8/13/2018	Jacqueline Thompson	Review rules and files re filing application for complex designation, exchange emails re same	1.4	365.00	511.00
8/13/2018	Jacqueline Thompson	Review and respond to A. Romero re PAGA letter, preparation for filing complaint, draft email to D. Valdez re same	0.7	365.00	255.50
8/13/2018	Alan Romero	Edit complaint and opt-in forms	0.1	540.00	54.00
8/13/2018	Alan Romero	Participate in call with D. Dixon re: opt-in forms	0.2	540.00	108.00
8/13/2018	Alan Romero	Proofread complaint in preparation for filing	1.6	540.00	864.00
8/13/2018	Alan Romero	Edit follow-up PAGA letter re: reimbursement claims	0.6	540.00	324.00
8/13/2018	Alan Romero	Incorporate cite checking edits re: complaint	0.3	540.00	162.00
8/14/2018	Damon Valdez	Teleconference w/ J. Thompson re PAGA letter and certified return receipts	0.2	350.00	70.00
8/14/2018	Damon Valdez	Review and archive PAGA letter w/ full certified mail history	0.3	350.00	105.00
8/14/2018	Damon Valdez	Exchange emails w/ J. Thompson re same	0.2	350.00	70.00
8/14/2018	Damon Valdez	Conference w/ J. Thompson re paper filing of complaint	0.2	350.00	70.00
8/14/2018	Alan Romero	Edit follow-up PAGA letter re: reimbursement claims	0.9	540.00	486.00
8/14/2018	Alan Romero	Review court documents re: filed Dixon v. C&W complaint	1.5	540.00	810.00
8/14/2018	Alan Romero	Summarize court documents and follow-tasks re: filed complaint	0.4	540.00	216.00
8/14/2018	Laura Ho	Review and revise PAGA letter	0.2	990.00	198.00
8/14/2018	Jacqueline Thompson	Review and respond to email from A. Romero, review email exchange re second PAGA letter, assist T. Rosado re preparing certified mail, travel to post office re mailing, review and upload documents from court after filing	1.7	365.00	620.50
8/14/2018	Jacqueline Thompson	Review email and attachment re PAGA letter	0.2	365.00	73.00
8/14/2018	Jacqueline Thompson	Prepare complaint and other documents for filing w/ court, phone call to One Legal re filing, email to attorneys re filing, phone calls to court, review rules	1.5	365.00	547.50
8/14/2018	Damon Valdez	Prepare and transmit second PAGA letter to State of California and Cushman and Wakefield offices	0.6	350.00	210.00
8/14/2018	Jacqueline Thompson	Phone call w/ D. Valdez re PAGA letters and certified return and conference re filing of complaint	0.6	365.00	219.00
8/15/2018	Alan Romero	Review court documents re: filed Dixon v. C&W complaint	1.0	540.00	540.00

Date	Professional	Narrative	Hours	Rate	Amount
8/15/2018	Alan Romero	Conduct research re: complex application requirements	0.3	540.00	162.00
8/15/2018	Alan Romero	Draft memorandum of points and authorities re: application for complex designation	0.9	540.00	486.00
8/15/2018	Laura Ho	Review and respond to A. Romero memo re follow up to filing complaint	0.2	990.00	198.00
8/15/2018	Jacqueline Thompson	Scan and email documents from court, review email exchange re review of documents from court re complaint filing, review rules service.	0.4	365.00	146.00
8/16/2018	Alan Romero	Review court materials/documents re: recently submitted complaint	0.5	540.00	270.00
8/16/2018	Jacqueline Thompson	Review and respond to A. Romero re updating case calendar and up coming events	0.4	365.00	146.00
8/17/2018	Jacqueline Thompson	Review and respond to email from A. Romero re serving defendant	0.2	365.00	73.00
8/20/2018	Alan Romero	Meet with J. Thompson re: serving Dixon v. C&W complaint-related documents	0.2	540.00	108.00
8/21/2018	Laura Ho	Conference w/ A. Romero re service and complex designation	0.3	990.00	297.00
8/21/2018	Jacqueline Thompson	Review and respond to email re service and complex application	0.7	365.00	255.50
8/21/2018	Alan Romero	Conference w/ L. Ho re service and complex description	0.3	540.00	162.00
8/22/2018	Damon Valdez	Prepare and upload to onelegal complaint and other documents to serve on defendant	2.2	350.00	770.00
8/22/2018	Laura Ho	Conferences w/ A. Romero re service of complaint and reviewing ADR information w/ client	0.2	990.00	198.00
8/22/2018	Alan Romero	Conference w/ L. Ho re service of complaint and reviewing ADR information with client	0.2	540.00	108.00
8/23/2018	Jacqueline Thompson	Review email exchange re service of complaint and additional documents	0.4	365.00	146.00
8/24/2018	Jacqueline Thompson	Review and update prolaw re professionals and deadline re A. Romero	0.5	365.00	182.50
8/28/2018	Damon Valdez	Review and archive proof of service of summons and complaint and update prolaw calendars re same	0.4	350.00	140.00
8/28/2018	Damon Valdez	Exchange emails w/ A. Romero and L. Ho re same	0.2	350.00	70.00
8/31/2018	Alan Romero	Review calendar and case-related requirements re: Dixon v. C&W complaint	0.2	540.00	108.00
8/31/2018	Laura Ho	Conference w/ A. Romero re discovery strategy	0.3	990.00	297.00
8/31/2018	Alan Romero	Participate in status meeting with L. Ho re: Dixon v. C&W follow-up tasks	0.4	540.00	216.00
9/5/2018	Laura Ho	Phone call w/ J. Schwartz and S. Abrahamson re overlapping cases	0.3	990.00	297.00
9/10/2018	Alan Romero	Conduct follow-up research re: follow-up requirements under Cal. Lab. Code Section 2699	0.2	540.00	108.00
9/10/2018	Alan Romero	Review ADR materials in preparation for call with D. Dixon	0.6	540.00	324.00
9/10/2018	Laura Ho	Exchange memos w/ J. Thompson re uploading complaint to LWDA	0.2	990.00	198.00
9/10/2018	Alan Romero	Participate in status update call with D. Dixon	0.5	540.00	270.00
9/11/2018	Jacqueline Thompson	Conference w/ D. Valdez re lwda rules	0.2	365.00	73.00
9/11/2018	Alan Romero	Research post-filing discovery requests requirements	0.3	540.00	162.00
9/11/2018	Alan Romero	Meet w/ L. Ho to discuss status of Dixon v. C&W case	0.1	540.00	54.00
9/11/2018	Laura Ho	Conference w/ A. Romero re related case and discovery	0.2	990.00	198.00
9/11/2018	Jacqueline Thompson	Review email exchange re other Cushman case and phone call w/ Dimitri re update	0.1	365.00	36.50
9/17/2018	Alan Romero	Review case file materials re: coordination with Seltz counsel	0.3	540.00	162.00
9/17/2018	Alan Romero	Participate in call with Seltz counsel re: coordination	0.6	540.00	324.00
9/17/2018	Laura Ho	Conference w/ Outten Golden and A. Romero re working together on both Cushman cases	0.6	990.00	594.00
9/19/2018	Alan Romero	Conduct research re: number of potential collective action members	1.7	540.00	918.00
9/21/2018	Laura Ho	Review and revise draft re case coordination and exchange memos w/ S. Abrahamson re same	0.3	990.00	297.00
9/21/2018	Alan Romero	Review Dixon v. C&W filing materials	0.3	540.00	162.00
9/24/2018	Laura Ho	Review scheduling order and exchange memos w/ S. Abrahamson re same	0.2	990.00	198.00
9/24/2018	Jacqueline Thompson	Review notification and attachments re filing- removed to federal court	0.7	365.00	255.50
9/25/2018	Laura Ho	Phone call w/ J. Schwartz and S. Abrahamson re case coordination and strategy	0.4	990.00	396.00
9/25/2018	Damon Valdez	Conference w/ J. Thompson re clerk error re case scheduling order	0.2	350.00	70.00
9/25/2018	Damon Valdez	Phone call to Judge Corley's clerk re same	0.2	350.00	70.00

Date	Professional	Narrative	Hours	Rate	Amount
9/25/2018	Alan Romero	Conduct research into Magistrate Judge J. Corley's record with complex trial matters	3.5	540.00	1890.00
9/25/2018	Jacqueline Thompson	Review and respond to email from L. Ho re updating case re updating case files, conference w/ D. Valdez re same, review court notification, conference w/ D. Valdez re court error, review email from D. Valdez re case documents	1.0	365.00	365.00
9/25/2018	Damon Valdez	Review and archive notice of removal documents	0.3	350.00	105.00
9/25/2018	Damon Valdez	Update prolaw calendars in light of removal of case to Federal court	0.8	350.00	280.00
9/26/2018	Alan Romero	Conduct research into Magistrate Judge J. Corley's record with complex trial matters	2.6	540.00	1404.00
9/26/2018	Jacqueline Thompson	Review email re magistrate	0.1	365.00	36.50
9/26/2018	Jacqueline Thompson	Review email re phone call w/ clerk re error on docket	0.1	365.00	36.50
9/26/2018	Damon Valdez	Teleconference w/ court clerk re correcting case management conference order	0.2	350.00	70.00
9/26/2018	Damon Valdez	Draft email to clerk re same	0.2	350.00	70.00
9/27/2018	Laura Ho	Review and respond to A. Romero memo re M. Corley	0.2	990.00	198.00
9/27/2018	Damon Valdez	Exchange emails w/ J. Thompson re corrected case management conference order	0.2	350.00	70.00
9/27/2018	Jacqueline Thompson	Review scheduling order, email to D. Valdez re same	0.1	365.00	36.50
9/28/2018	Laura Ho	Revise agreement re coordination exchange memos w/ S. Abrahamson re same and meet and confer re case schedule	0.3	990.00	297.00
10/2/2018	Laura Ho	Review draft case schedule and phone call w/ S. Abrahamson re same	0.4	990.00	396.00
10/2/2018	Laura Ho	Review and respond to S. Abrahamson memo re rates and coordination	0.2	990.00	198.00
10/3/2018	Alan Romero	Review relevancy of complaints re: other related C&W cases	0.9	540.00	486.00
10/3/2018	Laura Ho	Phone call w/ J. Melherin re introductions, settlement, discovery	0.3	990.00	297.00
10/3/2018	Laura Ho	Exchange memos w/ S. Abrahamson re case management and coordination	0.2	990.00	198.00
10/3/2018	Jacqueline Thompson	Review email re meet and confer	0.2	365.00	73.00
10/4/2018	Alan Romero	Participate in call with D. Dixon re: status update	0.2	540.00	108.00
10/4/2018	Jacqueline Thompson	Review email exchange re motion for class notice	0.2	365.00	73.00
10/5/2018	Alan Romero	Evaluate Plaintiff's response to CW consent-declination form	0.8	540.00	432.00
10/5/2018	Laura Ho	Review def. consent to mj and Conference w/ A. Romero re consent	0.2	990.00	198.00
10/11/2018	Alan Romero	Conduct review of relevancy of additional claims in other related C&W lawsuits	0.4	540.00	216.00
10/15/2018	Alan Romero	Conduct review of additional materials brought forward by D. Dixon	3.7	540.00	1998.00
10/15/2018	Alan Romero	Conduct research re: additional allegations that could require amendment to complaint	0.8	540.00	432.00
10/17/2018	Jacqueline Thompson	Conference w/ L. Ho and A Romero re EEOC complaint and coordination of cases	0.2	365.00	73.00
10/18/2018	Alan Romero	Meet with L. Ho re: status of case	0.2	540.00	108.00
10/18/2018	Laura Ho	Conference w/ A., Romero and J. Thompson re Dixon EEOC complaint and coordination of cases	0.2	990.00	198.00
10/19/2018	Alan Romero	Finalize notes from call with D. Dixon	0.6	540.00	324.00
10/19/2018	Alan Romero	Participate in call with D. Dixon re: case status	1.2	540.00	648.00
10/23/2018	Jacqueline Thompson	Exchange emails re letter to D. Dixon about case coordination	0.4	365.00	146.00
10/25/2018	Jacqueline Thompson	Review emails - move and organize into appropriate case folders	1.0	365.00	365.00
10/26/2018	Alan Romero	Follow up with J. Thompson re: consent forms	0.3	540.00	162.00
10/29/2018	Alan Romero	Participate in call with D. Dixon re: case status update	0.1	540.00	54.00
10/29/2018	Alan Romero	Finalize coordination document for signature	0.5	540.00	270.00
10/29/2018	Laura Ho	Conference w/ A. Romero re letter to Dimitri re coordination of cases	0.1	990.00	99.00
10/29/2018	Jacqueline Thompson	Exchange emails w/ A. Romero re letter to D. Dixon re coordination of cases	0.4	365.00	146.00
10/30/2018	Jacqueline Thompson	Review and respond to email form A. Romero re letter to D. Dixon, exchange emails w/ L. Ho re same, finalize letter to Dixon re coordination of cases	1.0	365.00	365.00
11/2/2018	Laura Ho	Exchange memos w/ J. Thompson re send coordination documents to client	0.1	990.00	99.00
11/2/2018	Jacqueline Thompson	Prepare acknowledgment and consent to case coordination, exchange emails w/ A. Romero and L. Ho re same, email to D. Dxon re same	0.8	365.00	292.00

Date	Professional	Narrative	Hours	Rate	Amount
11/14/2018	Jacqueline Thompson	Review acknowledgment of case coordination document, email to L. Ho re same, update files	0.3	365.00	109.50
11/16/2018	Laura Ho	Exchange memos w/ D. Dixon re workers comp release	0.2	990.00	198.00
11/16/2018	Jacqueline Thompson	Review email from L. Ho to D. Dixon re information sheet	0.1	365.00	36.50
11/19/2018	Laura Ho	Review and respond re stipulation re discovery stay and mediation	0.2	990.00	198.00
11/26/2018	Laura Ho	Review and respond to S. Abrahamson memo re Rotman and mediation discovery	0.2	990.00	198.00
11/26/2018	Laura Ho	Review workers comp release and exchange memos w/ D. Dixon re same	0.3	990.00	297.00
11/27/2018	Megan Ryan	Review complaint, paga letter, and research memo	0.4	690.00	276.00
11/28/2018	Megan Ryan	Review complaint, paga letter, prior filings, and prior research	2.1	690.00	1449.00
11/28/2018	Megan Ryan	Research on claims	0.8	690.00	552.00
11/28/2018	Megan Ryan	Draft certification of interested parties	0.3	690.00	207.00
11/28/2018	Megan Ryan	Strategize with L. Ho on discovery for mediation	0.2	690.00	138.00
11/28/2018	Laura Ho	Draft stipulation to stay case and exchange memos w/ opposing counsel re same	0.3	990.00	297.00
11/28/2018	Laura Ho	Review and respond to workers comp attorney re release	0.2	990.00	198.00
11/28/2018	Laura Ho	Phone call w/ S. Abrahamson re mediation information and edit list re same	0.5	990.00	495.00
11/29/2018	Megan Ryan	Call with D. Dixon on mediation and discovery	0.4	690.00	276.00
11/29/2018	Megan Ryan	Prepare ADR forms and certification of intersted parties and attorney addition form for filing after reviewing requirement	1.4	690.00	966.00
11/29/2018	Laura Ho	Phone call w/ opposing counsel and DC plaintiff counsel re mediation preparation and discovery	0.4	990.00	396.00
11/29/2018	Laura Ho	Review stipulation re stay and exchange memos w/ opposing counsel, have filed	0.3	990.00	297.00
11/29/2018	Laura Ho	Exchange memos w/ J. Plascencia re workers comp release	0.1	990.00	99.00
11/30/2018	Laura Ho	Review and repond to D. Dixon memo re workers comp release	0.2	990.00	198.00
12/3/2018	Megan Ryan	Review client documents	3.4	690.00	2346.00
12/4/2018	Stuart Kirkpatrick	Review Summation folders of discovery documents, and give M. Ryan reviewer permissions	0.2	350.00	70.00
12/4/2018	Stuart Kirkpatrick	Add M. Ryan to Cushman case matter in ProLaw	0.1	350.00	35.00
12/4/2018	Megan Ryan	Strategize with J. Thompson about organization of client documents	0.2	690.00	138.00
12/4/2018	Jacqueline Thompson	Review email exchange re case set up and organization	0.2	365.00	73.00
12/7/2018	Megan Ryan	Correspond with L. Ho and opposing counsel about need for a proposed order for the stip. to toll and stay	0.2	690.00	138.00
12/7/2018	Megan Ryan	Draft proposed order to stay and toll after reviewing docket	0.3	690.00	207.00
12/10/2018	Laura Ho	Conference w/ M. Ryan re proposed order re staying case	0.2	990.00	198.00
12/10/2018	Laura Ho	Exchange memos w/ D. Valdez re change in counsel	0.2	990.00	198.00
12/10/2018	Damon Valdez	Review stipulation to stay action	0.2	350.00	70.00
12/10/2018	Damon Valdez	Review and download case docket report	0.2	350.00	70.00
12/10/2018	Damon Valdez	Draft notice of change in counsel	0.3	350.00	105.00
12/10/2018	Damon Valdez	Exchange emails w/ M. Ryan and L. Ho re same	0.4	350.00	140.00
12/10/2018	Damon Valdez	Prepare and efile notice of change in counsel	0.3	350.00	105.00
12/10/2018	Megan Ryan	Revise proposed order and file	0.3	690.00	207.00
12/10/2018	Megan Ryan	Review notice of change of counsel form for filing	0.1	690.00	69.00
12/10/2018	Jacqueline Thompson	Review and respond to email from M. Ryan re filing stipulation, prepare stipulation for filing, efile and email chambers proposed order.	0.4	365.00	146.00
12/10/2018	Jacqueline Thompson	Review email re notice of appearance and change in counsel	0.3	365.00	109.50
12/11/2018	Megan Ryan	Manage calendaring of upcoming deadlines	0.1	690.00	69.00
12/19/2018	Laura Ho	Exchange memos w/ Seltz counsel re response re mediation document request	0.1	990.00	99.00
12/20/2018	Laura Ho	Exchange memos w/ S. Abrahamson re data exchange and mediation preparation	0.2	990.00	198.00
1/10/2019	Laura Ho	Exchange memos w/ S. Abrahamson re data status and plaintiff document production	0.2	990.00	198.00
1/10/2019	Megan Ryan	Correspondence with Seltz counsel about timeline for document production	0.1	690.00	69.00
1/17/2019	Laura Ho	Exchange memos w/ S. Abrahamson re mediation and new counsel	0.2	990.00	198.00
1/23/2019	Stuart Kirkpatrick	Add M. Ryan to Reviewer list in Summation Pro and confirm coding options for reviewing documents for potential production	0.3	350.00	105.00
1/23/2019	Stuart Kirkpatrick	Review coding layouts and options in Summation with M. Ryan	0.4	350.00	140.00

Date	Professional	Narrative	Hours	Rate	Amount
1/23/2019	Megan Ryan	Review plaintiff docs on summation	4.5	690.00	3105.00
1/24/2019	Megan Ryan	Review clients docs in summation	4.4	690.00	3036.00
1/28/2019	Megan Ryan	Review documents	0.4	690.00	276.00
2/1/2019	Stuart Kirkpatrick	Review case documents in Summation and email M. Ryan re: adjusting view settings to review and code documents	0.2	350.00	70.00
2/5/2019	Megan Ryan	Review Dixon docs	0.4	690.00	276.00
2/6/2019	Jacqueline Thompson	Review document production	2.0	365.00	730.00
2/6/2019	Laura Ho	Review and respond re draft protective order	0.2	990.00	198.00
2/6/2019	Jacqueline Thompson	Review case files	1.5	365.00	547.50
2/6/2019	Megan Ryan	Review proposed protective order and correspond with Seltz counsel about same	0.4	690.00	276.00
2/8/2019	Jacqueline Thompson	Review email from M. Ryan re review of case files	0.1	365.00	36.50
2/8/2019	Megan Ryan	Review protective orders	0.1	690.00	69.00
2/8/2019	Megan Ryan	Review Cushman docs	4.5	690.00	3105.00
2/11/2019	Jacqueline Thompson	Review email exchange w/ D. Dixon re mediation and deposition	0.1	365.00	36.50
2/13/2019	Megan Ryan	Correspond with Outten Golden about POs	0.1	690.00	69.00
2/13/2019	Megan Ryan	Review Dixon documents	0.5	690.00	345.00
2/13/2019	Stuart Kirkpatrick	Review M. Ryan document review notations in Summation and demonstrate Standard Viewer setting so she could review the final unmarked Dixon pdf	0.4	350.00	140.00
2/13/2019	Stuart Kirkpatrick	Review Summation manual and test redaction permissions, export sets, and load file production in preparation for creating document production for M. Ryan	3.0	350.00	1050.00
2/13/2019	Jacqueline Thompson	Review summation documents re preparing for production	0.8	365.00	292.00
2/15/2019	Laura Ho	Review correspondence re protective orders	0.2	990.00	198.00
2/19/2019	Jacqueline Thompson	Review and organize document production	2.5	365.00	912.50
2/19/2019	Jacqueline Thompson	Review stipulation and protection order	0.1	365.00	36.50
2/19/2019	Jacqueline Thompson	Review and respond to email from M. Ryan re [REDACTED] email	0.1	365.00	36.50
2/20/2019	Stuart Kirkpatrick	Redact and bates stamp additional production documents for M. Ryan	0.4	350.00	140.00
2/20/2019	Megan Ryan	Review documents	0.4	690.00	276.00
2/20/2019	Jacqueline Thompson	Review and respond to email from M. Ryan re Cushman document production	0.3	365.00	109.50
2/22/2019	Megan Ryan	Review defendnat document production	0.2	690.00	138.00
2/22/2019	Jacqueline Thompson	Review and respond to email from M. Ryan re document production	1.0	365.00	365.00
2/25/2019	Laura Ho	Review document production	0.2	990.00	198.00
2/25/2019	Megan Ryan	Reveiw documents	0.3	690.00	207.00
2/25/2019	Stuart Kirkpatrick	Review plaintiff's documents in Summation and redact per attorney notes, in preparation for service of production set	3.8	350.00	1330.00
2/25/2019	Jacqueline Thompson	Review and respond to email re document production	0.2	365.00	73.00
2/25/2019	Jacqueline Thompson	Review and respond to email re plaintiff document production	0.5	365.00	182.50
2/26/2019	Megan Ryan	Review join status report	0.1	690.00	69.00
2/26/2019	Megan Ryan	Review plaintiff documents for production for mediation	3.1	690.00	2139.00
2/27/2019	Stuart Kirkpatrick	Edit production in Summation per M. Ryan instructions to eliminate duplicates and irrelevant documents, and prepare finalized redacted pdf for M. Ryan review before bates stamping and service	3.8	350.00	1330.00
2/27/2019	Megan Ryan	Review plaintiff documents in preparation for mediation production	1.6	690.00	1104.00
2/28/2019	Stuart Kirkpatrick	Final edits to DIXON production documents per M. Ryan instructions, and bates stamp finalized pdf for M. Ryan review	0.5	350.00	175.00
2/28/2019	Megan Ryan	Review Dixon documents	0.2	690.00	138.00
3/1/2019	Laura Ho	Conference w/ Seltz counsel re mediation preparation and strategy	0.4	990.00	396.00
3/1/2019	Megan Ryan	Strategy meeting with L. Ho and Seltz counsel on discovery and mediation	0.3	690.00	207.00
3/5/2019	Jacqueline Thompson	Review email from plaintiff re schedule	0.1	365.00	36.50
3/8/2019	Jacqueline Thompson	Review email from D. Dixon, exchange email w/ M. Ryan re responding	0.2	365.00	73.00
3/12/2019	Laura Ho	Phone call w/ J. Schwartz re mediation strategy	0.3	990.00	297.00
3/14/2019	Laura Ho	Phone call w/ B. Dolan re status of promissory notes and data and correspondence w/ team re same	0.3	990.00	297.00
3/15/2019	Laura Ho	Correspondence w/ J. Schwartz re rescheduling mediation	0.1	990.00	99.00
3/19/2019	Laura Ho	Correspondence w/ D. Dixon re rescheduled mediation date	0.1	990.00	99.00
3/19/2019	Laura Ho	Correspondence w/ Seltz counsel re rescheduling mediation	0.1	990.00	99.00

Date	Professional	Narrative	Hours	Rate	Amount
3/21/2019	Laura Ho	Rescheduling mediation	0.2	990.00	198.00
3/27/2019	Laura Ho	Draft stip to continue stay and tolling	0.3	990.00	297.00
3/27/2019	Jacqueline Thompson	Review and respond to email from L. Ho re stipulation	0.4	365.00	146.00
3/28/2019	Laura Ho	Finalize stip and proposed order re continuing tolling and staying discovery	0.3	990.00	297.00
3/28/2019	Jacqueline Thompson	Review rules re stipulation, review case file re previous stioulation filed, conference w/ L. Ho re format for filing stipulation	0.6	365.00	219.00
3/28/2019	Jacqueline Thompson	Reformat stipulation and proposed order for filing w/ court	0.4	365.00	146.00
3/29/2019	Stuart Kirkpatrick	Finalize and efile Joint Stipulation and Proposed Order for L. Ho	0.3	350.00	105.00
3/29/2019	Stuart Kirkpatrick	Review standing orders and email Word version of Joint Stipulation and Proposed Order to Judge Corley	0.2	350.00	70.00
3/29/2019	Laura Ho	Finalize and have filed proposed stipulation to continue stay and tolling	0.2	990.00	198.00
3/29/2019	Jacqueline Thompson	Review email exchange re filing stipulation and proposed order	0.3	365.00	109.50
4/1/2019	Laura Ho	Correspondence w/ Dixon re reschedule mediation date	0.1	990.00	99.00
4/1/2019	Jacqueline Thompson	Review order re stay, update case calendar re deadlines	0.3	365.00	109.50
4/16/2019	Laura Ho	Correspondence w/ B. Dolan re mediation data production	0.1	990.00	99.00
5/7/2019	Jacqueline Thompson	Review email exchange from D. Dixon re draw	0.2	365.00	73.00
5/8/2019	Laura Ho	Review and respond to D. Dixon memo re letter re deficit	0.3	990.00	297.00
5/8/2019	Jacqueline Thompson	Review email exchange w/ D. Dixon and L. Ho re deficit payment request	0.2	365.00	73.00
6/3/2019	Jacqueline Thompson	Review email w/ article re Cushman lawsuit re executives	0.1	365.00	36.50
6/4/2019	Laura Ho	Correspondence w/ Seltz counsel re mediation brief and data analysis	0.2	990.00	198.00
6/6/2019	Laura Ho	Correspondence w/ client re mediation	0.1	990.00	99.00
6/6/2019	Jacqueline Thompson	Review email exchange w/ D. Dixon re mediation	0.1	365.00	36.50
6/7/2019	Laura Ho	Phone call w/ Seltz counsel re mediation brief and damages work up	0.7	990.00	693.00
6/10/2019	Beth Holtzman	Review complaint and background material on case	1.1	515.00	566.50
6/10/2019	Beth Holtzman	Review settlement mediation statement from Seltz v. Cushman & Wakefield, Inc. and internal memo on the salary basis test	1.2	515.00	618.00
6/10/2019	Beth Holtzman	Review case memos on plaintiff's personnel files and salary basis test	0.2	515.00	103.00
6/10/2019	Beth Holtzman	Confer with L. Ho re drafting section on California claims for mediation complaint	0.3	515.00	154.50
6/10/2019	Laura Ho	Correspondence w/ D. Dixon re mediation preparation	0.2	990.00	198.00
6/10/2019	Laura Ho	Conference w/ B. Holtzman re mediation statement drafting	0.2	990.00	198.00
6/10/2019	Beth Holtzman	Research salary basis issue, review case memo on salary basis	1.8	515.00	927.00
6/10/2019	Jacqueline Thompson	Review email excahnge re mediation location and time	0.1	365.00	36.50
6/11/2019	Beth Holtzman	Research salary basis test	1.3	515.00	669.50
6/11/2019	Beth Holtzman	Draft california section and salary basis test section of mediation complaint	4.0	515.00	2060.00
6/12/2019	Beth Holtzman	Draft mediation complaint, salary basis test argument	1.5	515.00	772.50
6/12/2019	Beth Holtzman	Draft mediation complaint, salary basis test	2.7	515.00	1390.50
6/13/2019	Beth Holtzman	Draft mediation statement, salary basis test and California claims sections	0.5	515.00	257.50
6/13/2019	Beth Holtzman	Review Outten and Golden draft of mediation statement	0.3	515.00	154.50
6/13/2019	Beth Holtzman	Drafted California Labor Code sections of Mediation statement	3.6	515.00	1854.00
6/13/2019	Beth Holtzman	Confer with L. Ho and J. Thompson re document production and identifying important documents for mediation statement	0.2	515.00	103.00
6/13/2019	Beth Holtzman	Draft mediation statement (California Labor Code section)	2.2	515.00	1133.00
6/13/2019	Laura Ho	Conference w/ B. Holtzman re mediation brief strategy	0.2	990.00	198.00
6/13/2019	Jacqueline Thompson	Conference w/ L. Ho and B. Holtzman re case files	0.2	365.00	73.00
6/17/2019	Beth Holtzman	Draft mediation statement, california claims section	0.4	515.00	206.00
6/17/2019	Beth Holtzman	Call with L. Ho, Deirdre Aaron, Pamela Disney, and Paolo Meireles re calculating damages for mediation	0.3	515.00	154.50
6/17/2019	Beth Holtzman	Confer with L. Ho re adding stand alone PAGA pay stub claims to mediation statement	0.3	515.00	154.50
6/17/2019	Beth Holtzman	Draft mediation statement (PAGA stand alone pay stub claims and edits to California claim section)	3.4	515.00	1751.00
6/17/2019	Beth Holtzman	Confer with L. Ho re wage statement PAGA claim evidence and edits to mediation statement draft	0.2	515.00	103.00
6/17/2019	Beth Holtzman	Review Cushman's wage exemplar production	0.4	515.00	206.00

Date	Professional	Narrative	Hours	Rate	Amount
6/17/2019	Laura Ho	Phone call w/ Seltz counsel re mediation brief	0.3	990.00	297.00
6/17/2019	Laura Ho	Review and revise draft mediation brief, Conferences w/ B. Holtzman re revisions	0.8	990.00	792.00
6/18/2019	Laura Ho	Further edits to mediation brief and memo to Selz counsel re revisions	0.7	990.00	693.00
6/19/2019	Laura Ho	Review and respond to first draft damages calculations	0.4	990.00	396.00
6/19/2019	Beth Holtzman	Confer with L. Ho re looking for additional evidence to support quantity of work argument in mediation statement	0.1	515.00	51.50
6/19/2019	Beth Holtzman	Research Cushman compensation plans, draw agreements for quantity of work salary basis test argument in mediation statement	1.1	515.00	566.50
6/19/2019	Beth Holtzman	Review proposed settlement term sheet and Seltz counsel's edits to mediation statement draft	0.7	515.00	360.50
6/19/2019	Laura Ho	Revise mediation brief and re-circulate to Seltz counsel	0.8	990.00	792.00
6/20/2019	Laura Ho	Phone call w/ P. Meireles re damages calculations	0.2	990.00	198.00
6/20/2019	Beth Holtzman	Find and send exhibits to Seltz counsel for mediation statement	0.3	515.00	154.50
6/20/2019	Beth Holtzman	Review latest drafts of mediation statement and term sheet	0.3	515.00	154.50
6/20/2019	Laura Ho	Revisions to mediation brief, term sheet, and correspondence w/ Seltz counsel re strategy	2.5	990.00	2475.00
6/20/2019	Jacqueline Thompson	Review and respond to email from L. Ho re mediation preparation	0.5	365.00	182.50
6/21/2019	Jacqueline Thompson	Mediation preparation	0.9	365.00	328.50
6/21/2019	Laura Ho	Correspondence w/ D. Aaron re mediation strategy	0.1	990.00	99.00
6/24/2019	Beth Holtzman	Review defendant's mediation statement	0.5	515.00	257.50
6/24/2019	Beth Holtzman	Confer with L. Ho, Deirdre Aaron, Gregg Shavitz, Paolo Meireles, Justin Swartz re strategy for mediation and calculating damages	0.8	515.00	412.00
6/24/2019	Beth Holtzman	Review notes from interviews with other Cushman Appraisers	0.3	515.00	154.50
6/24/2019	Jacqueline Thompson	Review and respond to email from L. Ho re mediation preparation	0.2	365.00	73.00
6/24/2019	Laura Ho	Strategy w/ B. Holtzman and Seltz counsel re mediation demand	0.8	990.00	792.00
6/24/2019	Beth Holtzman	Follow up research on salary basis test case law, whether employer needs to recoup the draw	4.2	515.00	2163.00
6/24/2019	Laura Ho	Further research re salary basis test	1.0	990.00	990.00
6/25/2019	Beth Holtzman	Confer with L. Ho re salary basis test follow up research and case law involving salary basis and class certification	0.1	515.00	51.50
6/25/2019	Beth Holtzman	Research salary basis test and class certification case law involving draw compensation structures	1.8	515.00	927.00
6/25/2019	Beth Holtzman	Telephone call with L. Ho and plaintiff (Dimitri Dixon) re overview and expectations of mediation	0.5	515.00	257.50
6/25/2019	Beth Holtzman	Review D.C. Circuit discrimination on the basis of race lawsuit against Cushman & Wakefield	0.2	515.00	103.00
6/25/2019	Beth Holtzman	Research salary basis test and class certification case law involving draw compensation structures	1.9	515.00	978.50
6/26/2019	Laura Ho	Review and respond to new damages chart from Paolo	0.2	990.00	198.00
6/26/2019	Laura Ho	Phone call w/ B. Dolan re mediation attendance	0.1	990.00	99.00
6/26/2019	Beth Holtzman	Draft memo on salary basis test and class certification case law involving draw compensation structures	5.9	515.00	3038.50
6/26/2019	Beth Holtzman	Review recoverable draw compensation and Appraiser contracts in preparation for mediation	0.5	515.00	257.50
6/26/2019	Beth Holtzman	Review settlement offers from previous appraiser cases (JP Morgan Chase, Boyd)	0.9	515.00	463.50
6/27/2019	Beth Holtzman	Travel to and from mediation	0.8	515.00	412.00
6/27/2019	Beth Holtzman	Mediation	5.5	515.00	2832.50
6/27/2019	Laura Ho	Travel to and from SF re mediation	1.0	990.00	990.00
6/27/2019	Laura Ho	Attend mediation	5.5	990.00	5445.00
6/28/2019	Laura Ho	Correspondence w/ J. Schwartz re status report	0.1	990.00	99.00
6/28/2019	Laura Ho	Phone call w/ D. Dixon re mediation status and next steps	0.3	990.00	297.00
7/1/2019	Beth Holtzman	Review draft Joint Status report after mediation	0.2	515.00	103.00
7/1/2019	Jacqueline Thompson	Review and respond to L. Ho re mediation binder	0.5	365.00	182.50
7/1/2019	Laura Ho	Correspondence w/ B. Dolan re status report and oversee filing of same	0.3	990.00	297.00
7/1/2019	Damon Valdez	Prepare and efile joint status report	0.3	350.00	105.00
7/1/2019	Damon Valdez	Exchange emails w/ Beth Holtzman re same	0.2	350.00	70.00
7/3/2019	Beth Holtzman	Check status of stay	0.3	515.00	154.50
7/3/2019	Laura Ho	Correspondence w/ D. Aaron re case deadlines and coordination	0.2	990.00	198.00
7/5/2019	Laura Ho	Correspondence w/ J. Schwartz re settlement strategy	0.2	990.00	198.00

Date	Professional	Narrative	Hours	Rate	Amount
7/8/2019	Laura Ho	Phone call w/ D. Dixon re case strategy	0.3	990.00	297.00
7/15/2019	Laura Ho	Review and comment on proposed litigation schedule	0.6	990.00	594.00
7/16/2019	Beth Holtzman	Review proposed amended schedule	0.2	515.00	103.00
7/16/2019	Laura Ho	Correspondence w/ Seltz counsel re litigation schedule	0.3	990.00	297.00
7/18/2019	Beth Holtzman	Call with L. Ho, Justin Swartz, Dierdre Aaron, Paolo Meireles re finalizing proposed scheduling order and strategy for call later today with Seltz counsel post mediation	0.6	515.00	309.00
7/18/2021	Laura Ho	Call with B. Holtzman, Justin Swartz, Dierdre Aaron, Paolo Meireles re finalizing proposed scheduling order and strategy for call later today with Seltz counsel post mediation	0.6	990.00	594.00
7/18/2019	Beth Holtzman	Call with L. Ho, Deirdre Aaron, Pamela Disney, Justin Swartz, Paolo Meireles and opposing counsel (Brendan Dolan, Sadina Montani) regarding follow up from mediation and proposed scheduling order	0.5	515.00	257.50
7/18/2021	Laura Ho	Call with B. Holtzman, Deirdre Aaron, Pamela Disney, Justin Swartz, Paolo Meireles and opposing counsel (Brendan Dolan, Sadina Montani) regarding follow up from mediation and proposed scheduling order	0.5	990.00	495.00
7/19/2019	Beth Holtzman	Call with L. Ho, Deirdre Aaron, Pamela Disney re coordinating cases	0.3	515.00	154.50
7/19/2021	Laura Ho	Call with B. Holtzman, Deirdre Aaron, Pamela Disney re coordinating cases	0.3	990.00	297.00
7/19/2019	Beth Holtzman	Review docket re initial case management conferences and review northern district of california protective order	1.5	515.00	772.50
7/23/2019	Beth Holtzman	Review recent filings and correspondence with Seltz counsel	0.3	515.00	154.50
7/24/2019	Beth Holtzman	Call with L. Ho, Dierdre Aaron, Pamela Disney, Paolo Miereles re recap of Seltz status conference and e-discovery plan	0.3	515.00	154.50
7/24/2019	Beth Holtzman	Call with L. Ho, Dierdre Aaron, Pamela Disney, Paolo Mierles and opposing counsel (Brendan Dolan, Sadina Montani) re coordinating discovery and planning for the Dixon initial case management conference	0.3	515.00	154.50
7/24/2019	Beth Holtzman	Draft initial case management conference statement	0.7	515.00	360.50
7/24/2019	Laura Ho	Phone call w/ Seltz counsel re strategy re coordiation	0.3	990.00	297.00
7/24/2019	Laura Ho	Phone call w/ opposing counsel and Seltz counsel re case management conference and scheduling	0.3	990.00	297.00
7/25/2019	Beth Holtzman	Draft case management conference statement	2.7	515.00	1390.50
7/25/2019	Beth Holtzman	Review Northern District of California's civil rules on Case Management Statements and Judge's standing order	0.4	515.00	206.00
7/25/2019	Beth Holtzman	Draft joint case management statement	0.6	515.00	309.00
7/26/2019	Beth Holtzman	Draft case management conference statement	1.0	515.00	515.00
7/29/2019	Beth Holtzman	Draft joint case management statement	0.4	515.00	206.00
7/29/2019	Beth Holtzman	Edit joint case management conference statement	0.4	515.00	206.00
7/29/2019	Laura Ho	Review and revise draft case management conference statement and correspondence w/ B. Holtzman re edits	0.8	990.00	792.00
7/29/2019	Jacqueline Thompson	Review email exchange re case management conference	0.2	365.00	73.00
7/30/2019	Beth Holtzman	Review edits to joint case management conference statement draft	0.2	515.00	103.00
7/30/2019	Laura Ho	Correspondence w/ D. Aaron re case management conference statement	0.2	990.00	198.00
7/31/2019	Beth Holtzman	Call with L. Ho, Pamela Disney, Deirdre Aaron and opposing counsel (Brendan Dolan, Sadina Montani) re draft ESI and discovery coordination proposal and edits to draft joint case management conference statement	0.4	515.00	206.00
7/31/2019	Laura Ho	Revise case management conference statement and send to B. Dolan	0.3	990.00	297.00
7/31/2019	Laura Ho	Phone call w/ Seltz counsel and B. Dolan re case management conference and discovery	0.4	990.00	396.00
7/31/2019	Beth Holtzman	Review opposing counsel's edits to case management conference statement	0.2	515.00	103.00
7/31/2019	Beth Holtzman	Review Seltz's initial discovery requests and timing of 216(b) motion	0.2	515.00	103.00
8/1/2019	Jacqueline Thompson	Review email exchange re case management conference	0.2	365.00	73.00
8/2/2019	Beth Holtzman	Review updated initial RFPs	0.2	515.00	103.00
8/7/2019	Beth Holtzman	Confer with L. Ho re preparing initial disclosures	0.1	515.00	51.50
8/7/2019	Beth Holtzman	Review proposed schedule for case	0.3	515.00	154.50
8/7/2019	Stuart Kirkpatrick	Calendar initial disclosures deadline into ProLaw for B. Holtzman	0.1	350.00	35.00
8/7/2019	Beth Holtzman	Draft plaintiff's initial disclosures	1.7	515.00	875.50
8/7/2019	Laura Ho	Conference w/ B. Holtzman re initial disclosures	0.2	990.00	198.00

Date	Professional	Narrative	Hours	Rate	Amount
8/7/2019	Jacqueline Thompson	Review email exchange between L. Ho and Beth Holtzman re scheduling order	0.1	365.00	36.50
8/8/2019	Beth Holtzman	Review case management conference statement and docket in preparation for case management conference	0.7	515.00	360.50
8/8/2019	Beth Holtzman	Travel to and from CMC	1.0	515.00	515.00
8/8/2019	Laura Ho	Travel to from court re case management conference	1.0	990.00	990.00
8/8/2019	Laura Ho	Appear re case management conference	0.2	990.00	198.00
8/8/2019	Beth Holtzman	Case management conference with L. Ho and opposing counsel (Brendan Dolan)	0.2	515.00	103.00
8/8/2019	Stuart Kirkpatrick	Review court order and calendar approved filing deadlines into ProLaw for B. Holtzman	0.3	350.00	105.00
8/8/2019	Beth Holtzman	Draft initial disclosures	0.3	515.00	154.50
8/9/2019	Beth Holtzman	Confer with J. Thompson re filing notice of appearance	0.1	515.00	51.50
8/9/2019	Beth Holtzman	Draft plaintiff's initial disclosures	2.1	515.00	1081.50
8/9/2019	Beth Holtzman	Review amended 1st set of interrogatories and amended 1st set of RFPDs	0.2	515.00	103.00
8/9/2019	Laura Ho	Review and revise initial disclosures	1.2	990.00	1188.00
8/9/2019	Laura Ho	Review and revise notice of appearance	0.1	990.00	99.00
8/9/2019	Jacqueline Thompson	Confer with B. Holtzman re filing notice of appearance	0.1	365.00	36.50
8/9/2019	Jacqueline Thompson	Prepare notice of appearance for B. Holtzman	0.3	365.00	109.50
8/9/2019	Jacqueline Thompson	Email to L. Ho re edits to caption and change in counsel	0.1	365.00	36.50
8/9/2019	Jacqueline Thompson	Email to L. Ho re change in counsel	0.2	365.00	73.00
8/12/2019	Beth Holtzman	Review draft 216(b) tolling agreement	0.1	515.00	51.50
8/12/2019	Stuart Kirkpatrick	Calendar additional deadlines from 8/9 court order into ProLaw	0.2	350.00	70.00
8/12/2019	Laura Ho	Review and respond to D. Aaron memo re tolling agreement	0.2	990.00	198.00
8/13/2019	Beth Holtzman	Draft initial disclosures	0.4	515.00	206.00
8/13/2019	Laura Ho	Correspondence w/ D. Aaron re tolling stipulation	0.1	990.00	99.00
8/13/2019	Laura Ho	Correspondence w/ B. Holtzman re initial disclosures	0.1	990.00	99.00
8/14/2019	Beth Holtzman	Review Seltz counsel's edits to plaintiff's initial disclosures	0.1	515.00	51.50
8/15/2019	Beth Holtzman	Confer with L. Ho re amending PAGA letter to include a Cal Labor Code 203 claim	0.1	515.00	51.50
8/15/2019	Beth Holtzman	Draft amended PAGA letter (adding Cal. Labor Code 203 claim)	1.2	515.00	618.00
8/15/2019	Beth Holtzman	Review plaintiff's initial disclosures	0.3	515.00	154.50
8/15/2019	Laura Ho	Conference w/ B. Holtzman re drafting new PAGA letter for 203 claim, review draft	0.3	990.00	297.00
8/15/2019	Beth Holtzman	Finalize plaintiff's initial disclosures	0.1	515.00	51.50
8/15/2019	Stuart Kirkpatrick	Review Initial Disclosures draft and email B. Holtzman and J. Thompson re: drafting Proof of Service	0.2	350.00	70.00
8/15/2019	Jacqueline Thompson	Review email exchange re initial disclosures	0.1	365.00	36.50
8/16/2019	Beth Holtzman	Finalize PAGA letter	0.3	515.00	154.50
8/16/2019	Laura Ho	Finalize and have filed PAGA letter re 203	0.1	990.00	99.00
8/16/2019	Stuart Kirkpatrick	Finalize and file Amended PAGA Notice on LWDA website, for B. Holtzman and L. Ho	1.1	350.00	385.00
8/16/2019	Stuart Kirkpatrick	Instruct C. Giannini re: preparing certified mailings for service of amended PAGA notice	0.2	350.00	70.00
8/16/2019	Stuart Kirkpatrick	Finalize and serve Initial Disclosures	0.6	350.00	210.00
8/19/2019	Laura Ho	Review and respond to D. Aaron memo re copycat filing	0.2	990.00	198.00
8/19/2019	Beth Holtzman	Review complaint from Colorado Cushman appraiser case	0.1	515.00	51.50
8/20/2019	Beth Holtzman	Call with L. Ho, Pamela Disney, Justin Swartz, Deirdre Aaron, Paolo Meireles re strategy for new FLSA lawsuit filed against Cushman in Colorado	0.5	515.00	257.50
8/20/2019	Laura Ho	Phone call w/ Seltz counsel re Col. case	0.5	990.00	495.00
8/20/2019	Laura Ho	Conference w/ B. Dolan re Colo case and memo to file re same	0.3	990.00	297.00
8/21/2019	Laura Ho	Review and revise ESI protocol	0.3	990.00	297.00
8/21/2019	Jacqueline Thompson	Review email from dixon re update	0.1	365.00	36.50
8/22/2019	Beth Holtzman	Review Defendants' initial disclosures and updated ESI protocol	0.3	515.00	154.50
8/28/2019	Laura Ho	Correspondence w/ S. Kirkpatrick re PAGA letter	0.1	990.00	99.00
8/28/2019	Laura Ho	Correspondence w/ P. Disney re ESI agreement	0.1	990.00	99.00
8/29/2019	Stuart Kirkpatrick	Prepare new certified mailing for PAGA notice to CT Corporation's updated address	0.2	350.00	70.00

Date	Professional	Narrative	Hours	Rate	Amount
8/30/2019	Laura Ho	Draft ESI agreement, memo to opposing counsel re differences between Summation and Concordance; Conferences w/ J. Thompson re edits	0.8	990.00	792.00
8/30/2019	Jacqueline Thompson	Conference w/ L. Ho re ESI agreement	0.1	365.00	36.50
8/30/2019	Jacqueline Thompson	Review and edit ESI agreemnt	0.1	365.00	36.50
9/4/2019	Laura Ho	Correspondence w/ P. Disney re ESI filing in Seltz	0.1	990.00	99.00
9/5/2019	Beth Holtzman	Review joint motion and stipulation regarding ESI	0.1	515.00	51.50
9/5/2019	Jacqueline Thompson	Review email re document transfer	0.4	365.00	146.00
9/9/2019	Laura Ho	Revise ESI stip and send to opposing counsel	0.3	990.00	297.00
9/9/2019	Laura Ho	Correspondence w/ D. Aaron re discovery	0.1	990.00	99.00
9/10/2019	Laura Ho	Correspondence w/ J. Thompson re filing ESI stip	0.1	990.00	99.00
9/10/2019	Laura Ho	ESI stip filing	0.2	990.00	198.00
9/10/2019	Stuart Kirkpatrick	Review final ESI protocol and email J. Thompson in preparation for efilng	0.3	350.00	105.00
9/10/2019	Jacqueline Thompson	Prepare and file stipulation and proposed order	0.6	365.00	219.00
9/16/2019	Beth Holtzman	Review defendants' response to Request for Production No. 1	0.3	515.00	154.50
9/26/2019	Beth Holtzman	Review draft letter in response to Defendants' response to RFPD No. 1	0.2	515.00	103.00
9/27/2019	Laura Ho	Conference w/ D. Aaron re discovery meet and confer strategy	0.2	990.00	198.00
9/27/2019	Laura Ho	Legal research re discovery meet and confer letter draft	0.4	990.00	396.00
10/1/2019	Beth Holtzman	Review production from defendants	0.3	515.00	154.50
10/1/2019	Beth Holtzman	Review Plaintiff Seltz's responses and objections to defendant's first set of document production requests	0.3	515.00	154.50
10/1/2019	Laura Ho	Correspondence w/ D. Aaron re discovery meet and confer	0.2	990.00	198.00
10/1/2019	Beth Holtzman	Review Plaintiff Seltz's responses and objections to defendant's first set of document production requests	0.2	515.00	103.00
10/2/2019	Laura Ho	Correspondence w/ Seltz counsel re discovery meet and confer	0.2	990.00	198.00
10/2/2019	Beth Holtzman	Review defendant's written discovery responses and initial production	0.2	515.00	103.00
10/3/2019	Beth Holtzman	Review Plaintiff Seltz's responses to Defendants' first set of discovery responses	0.7	515.00	360.50
10/3/2019	Beth Holtzman	Correspondence re file sharing with Pamela Disney	0.1	515.00	51.50
10/3/2019	Beth Holtzman	Review Plaintiff Seltz's first set of produced documents	0.6	515.00	309.00
10/3/2019	Laura Ho	Correspondence w/ opposing counsel re discovery requests	0.2	990.00	198.00
10/3/2019	Laura Ho	Correspondence w/ D. Aaron re Seltz discovery responses and documents	0.3	990.00	297.00
10/3/2019	Jacqueline Thompson	Review and resond to email from L. Ho re discovery responses, update prolaw re deadline	0.2	365.00	73.00
10/3/2019	Jacqueline Thompson	Review email exchanbge re discovery responses	0.1	365.00	36.50
10/3/2019	Jacqueline Thompson	Review email exchange re defendant documet production	0.2	365.00	73.00
10/3/2019	Jacqueline Thompson	Retreive defendant production	0.4	365.00	146.00
10/3/2019	Jacqueline Thompson	Prepare documents for loading into summation, email w/ summation re same	0.6	365.00	219.00
10/4/2019	Beth Holtzman	Confer with L. Ho and J. Thompson re document review and drafting responses to discovery	0.4	515.00	206.00
10/4/2019	Laura Ho	Conference w/ B. Holtzman and J. Thompson re responding to discovery	0.4	990.00	396.00
10/4/2019	Beth Holtzman	Review PAGA and amended complaint deadlines	0.2	515.00	103.00
10/4/2019	Laura Ho	Draft memo to opposing counsel re amending complaint to add 203 and PAGA	0.2	990.00	198.00
10/4/2019	Beth Holtzman	Review correspondence from opposing counsel re discovery	0.2	515.00	103.00
10/4/2019	Stuart Kirkpatrick	Locate PAGA return receipts and email link to J. Thompson	0.3	350.00	105.00
10/4/2019	Jacqueline Thompson	Review PAGA rules, email to Beth Holtzman re same	0.3	365.00	109.50
10/4/2019	Jacqueline Thompson	Confer with L. Ho and Beth Holtzman re document review and drafting responses to discovery	0.4	365.00	146.00
10/7/2019	Beth Holtzman	Draft responses and objections to defendants' first set of request for documents	0.2	515.00	103.00
10/7/2019	Beth Holtzman	Draft responses and objections to defendants' first set of request for documents	0.6	515.00	309.00
10/7/2019	Beth Holtzman	Draft responses and objections to defendants' first set of request for documents	0.1	515.00	51.50
10/7/2019	Laura Ho	Memo w/ B. Holtzman re amending complaint	0.1	990.00	99.00
10/7/2019	Beth Holtzman	Draft amended complaint	0.3	515.00	154.50
10/7/2019	Beth Holtzman	Draft amended complaint	0.8	515.00	412.00

Date	Professional	Narrative	Hours	Rate	Amount
10/7/2019	Beth Holtzman	Draft amended complaint	0.6	515.00	309.00
10/8/2019	Beth Holtzman	Draft amended complaint	0.7	515.00	360.50
10/8/2019	Beth Holtzman	Draft amended complaint	0.2	515.00	103.00
10/8/2019	Laura Ho	Review and revise first amended complaint draft, Conferences w/ B. Holtzman re edits	1.2	990.00	1188.00
10/8/2019	Beth Holtzman	Draft amended complaint	0.8	515.00	412.00
10/8/2019	Beth Holtzman	Draft amended complaint	0.1	515.00	51.50
10/8/2019	Beth Holtzman	Draft amended complaint	0.2	515.00	103.00
10/8/2019	Beth Holtzman	Review comparison of complaint and amended complaint	0.4	515.00	206.00
10/9/2019	Beth Holtzman	Review comparison of complaint and amended complaint	0.1	515.00	51.50
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	0.5	515.00	257.50
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	0.5	515.00	257.50
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	1.1	515.00	566.50
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	0.3	515.00	154.50
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	0.3	515.00	154.50
10/9/2019	Beth Holtzman	Review Plaintiff Seltz's production of documents in response to Defendants first set of document production requests	0.5	515.00	257.50
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	0.5	515.00	257.50
10/9/2019	Laura Ho	Correspondence w/ opposing counsel attaching amended complaint	0.2	990.00	198.00
10/9/2019	Beth Holtzman	Draft responses and objections to Defendants' first set of document requests	0.6	515.00	309.00
10/10/2019	Beth Holtzman	Review correspondence from opposing counsel (Sadina Montani) re discovery issues	0.2	515.00	103.00
10/10/2019	Beth Holtzman	Draft responses and objections to defendants' first set of discovery production requests	0.2	515.00	103.00
10/10/2019	Beth Holtzman	Review Plaintiff's personnel files and employment related documents	0.7	515.00	360.50
10/10/2019	Beth Holtzman	Review correspondence with opposing counsel (Sadina Montani) regarding stipulating to filing of amended complaints	0.1	515.00	51.50
10/10/2019	Jacqueline Thompson	Review email and attachemnt re discovery issues	0.2	365.00	73.00
10/10/2019	Beth Holtzman	Review memo on Plaintiff's personnel file	0.2	515.00	103.00
10/10/2019	Beth Holtzman	Finalize first amended complaint	0.3	515.00	154.50
10/10/2019	Beth Holtzman	Prepare exhibits for first amended complaint	0.2	515.00	103.00
10/10/2019	Beth Holtzman	Revise first amended complaint	0.3	515.00	154.50
10/10/2019	Beth Holtzman	Review draft stipulation regarding first amended complaint	0.1	515.00	51.50
10/10/2019	Beth Holtzman	Review exhibits for first amended complaint	0.2	515.00	103.00
10/10/2019	Beth Holtzman	Review memo on Plaintiff's personnel file	0.2	515.00	103.00
10/10/2019	Jacqueline Thompson	Exchange emails re loading documents into summation	0.2	365.00	73.00
10/10/2019	Jacqueline Thompson	Review and respond to email from Beth Holtzman re amended complaint	0.3	365.00	109.50
10/11/2019	Beth Holtzman	Draft stipulation re amended complaint	0.3	515.00	154.50
10/11/2019	Beth Holtzman	Review stipulation regarding first amended complaint	0.2	515.00	103.00
10/11/2019	Beth Holtzman	Review first amended complaint and stipulation regarding first amended complaint in preparation for filing	0.2	515.00	103.00
10/11/2019	Beth Holtzman	Final review of First Amended Complaint and joint stipulation regarding first amended complaint	0.1	515.00	51.50
10/11/2019	Jacqueline Thompson	Exchange emails re loading documents into summation	0.3	365.00	109.50
10/11/2019	Jacqueline Thompson	Review email exchange re stipulation and first amended complaint, efile amended complaint	0.6	365.00	219.00
10/14/2019	Beth Holtzman	Draft responses to defendants' first set of requests for production	0.9	515.00	463.50
10/14/2019	Beth Holtzman	Draft responses to defendants' first set of requests for production of documents	0.5	515.00	257.50
10/14/2019	Jacqueline Thompson	Review email from S. Kirkpatrick re production	0.1	365.00	36.50
10/14/2019	Jacqueline Thompson	Prepare fedx re chambers copy of 3rd amended complaint	0.2	365.00	73.00
10/15/2019	Laura Ho	Review/revise draft request for production of documents responses, correspondence w/ B. Holtzman re edits	0.6	990.00	594.00
10/15/2019	Beth Holtzman	Draft objections and responses to defendants' first set of production requests	0.2	515.00	103.00

Date	Professional	Narrative	Hours	Rate	Amount
10/16/2019	Beth Holtzman	Draft responses and objections to defendants first set of production requests	0.2	515.00	103.00
10/16/2019	Beth Holtzman	Draft responses and objections to defendants first set of production requests	0.5	515.00	257.50
10/16/2019	Beth Holtzman	Draft responses and objections to defendants first set of production requests	0.2	515.00	103.00
10/18/2019	Beth Holtzman	Review correspondence with Seltz counsel re discovery issues	0.1	515.00	51.50
10/21/2019	Jacqueline Thompson	Review emails re case strategy	0.1	365.00	36.50
10/21/2019	Laura Ho	Correspondence w/ Seltz counsel re strategy on discovery of class lists	0.2	990.00	198.00
10/23/2019	Beth Holtzman	Email plaintiff re documents to produce in response to defendants' first request for production of documents	0.2	515.00	103.00
10/23/2019	Beth Holtzman	Review draft stipulation regarding response to amended complaint	0.2	515.00	103.00
10/23/2019	Beth Holtzman	Conference call with L. Ho, Dierdre Aaron, Pamela Disney, and Molly Frandsen re strategy for producing collective list and defendants' stipulation on response to amended complaint	0.3	515.00	154.50
10/23/2019	Beth Holtzman	Call with plaintiff to discuss production of documents and status of case	0.5	515.00	257.50
10/23/2019	Beth Holtzman	Correspondence with plaintiff re follow-up from call and documents she should look for	0.2	515.00	103.00
10/23/2019	Beth Holtzman	Review voicemail message from plaintiff	0.1	515.00	51.50
10/23/2019	Beth Holtzman	Review correspondence with co-counsel and opposing counsel re production of class list	0.1	515.00	51.50
10/23/2019	Laura Ho	Phone call w/ Seltz counsel re discovery and responsive pleading	0.3	990.00	297.00
10/23/2019	Laura Ho	Review proposed stipulation re extension of time for responsive pleading and correspondence w/ opposing counsel re same	0.2	990.00	198.00
10/23/2019	Laura Ho	Review and revise correspondence to opposing counsel re class list discovery	0.2	990.00	198.00
10/23/2019	Jacqueline Thompson	Review email exchange re status of case	0.2	365.00	73.00
10/24/2019	Beth Holtzman	Confer with L. Ho re follow up from call with Dimitri	0.1	515.00	51.50
10/24/2019	Beth Holtzman	Call with plaintiff to discuss documents needed for discovery	0.4	515.00	206.00
10/24/2019	Beth Holtzman	Follow-up with Plaintiff	0.1	515.00	51.50
10/25/2019	Beth Holtzman	Follow up with plaintiff regarding documents and responses to discovery	0.2	515.00	103.00
10/25/2019	Laura Ho	Correspondence w/ D. Aaron re scheduling discovery meet and confer	0.1	990.00	99.00
10/28/2019	Beth Holtzman	Review documents from plaintiff re conversations with other employees	0.1	515.00	51.50
10/30/2019	Beth Holtzman	Correspondence with opposing counsel and Seltz counsel re proposed agreement for discovery dispute	0.2	515.00	103.00
10/30/2019	Beth Holtzman	Follow up with plaintiff regarding responses to defendants first request for production of documents	0.1	515.00	51.50
10/30/2019	Jacqueline Thompson	Review email exchange re discovery responses and documents	0.1	365.00	36.50
10/30/2019	Jacqueline Thompson	Conference w/ S. Kirkpatrick re document production	0.1	365.00	36.50
10/30/2019	Jacqueline Thompson	Exchange emails w/ Beth Holtzman and S. Kirkpatrick re Dixon document production	0.2	365.00	73.00
10/30/2019	Laura Ho	Review and respond to Cushman correspondence re class list discovery	0.2	990.00	198.00
10/30/2019	Beth Holtzman	Draft responses to defendants' request for production of documents	0.3	515.00	154.50
10/30/2019	Stuart Kirkpatrick	Import D. Dixon evidence into Summation, for J. Thompson	0.2	350.00	70.00
10/30/2019	Beth Holtzman	Draft responses to defendants' request for production of documents	0.5	515.00	257.50
10/30/2019	Beth Holtzman	Draft responses to defendants' request for production of documents	0.2	515.00	103.00
10/31/2019	Beth Holtzman	Conference call with L. Ho, Dierdre Aaron and Molly Frandsen re class list proposal	0.2	515.00	103.00
10/31/2019	Beth Holtzman	Review discovery issue class list proposal and counter-proposal	0.2	515.00	103.00
10/31/2019	Beth Holtzman	Confer with J. Thompson re production of documents	0.1	515.00	51.50
10/31/2019	Beth Holtzman	Draft responses to defendants request for production of documents	0.6	515.00	309.00
10/31/2019	Laura Ho	Phone call w/ Seltz counsel re class list strategy	0.3	990.00	297.00
10/31/2019	Laura Ho	Correspondence w/ opposing counsel re class list meet and confer	0.3	990.00	297.00
10/31/2019	Beth Holtzman	Draft responses to defendants request for production of documents	0.7	515.00	360.50
10/31/2019	Beth Holtzman	Contact named plaintiff re documents for production	0.1	515.00	51.50
10/31/2019	Beth Holtzman	Draft responses to defendants request for production of documents	0.8	515.00	412.00
10/31/2019	Beth Holtzman	Draft responses to defendants request for production of documents	0.2	515.00	103.00

Date	Professional	Narrative	Hours	Rate	Amount
10/31/2019	Beth Holtzman	Correspondence with plaintiff re document production	0.2	515.00	103.00
10/31/2019	Jacqueline Thompson	Conference w/ Beth Holtzman re production of documents	0.1	365.00	36.50
11/1/2019	Beth Holtzman	Confer with S. Kirkpatrick re document production	0.1	515.00	51.50
11/1/2019	Beth Holtzman	Determine liability period for document production	0.1	515.00	51.50
11/1/2019	Beth Holtzman	Review plaintiff's documents and determine if they should be produced	0.4	515.00	206.00
11/1/2019	Beth Holtzman	Draft responses to defendants request for production	0.3	515.00	154.50
11/1/2019	Beth Holtzman	Call plaintiff and discuss document production	0.2	515.00	103.00
11/1/2019	Beth Holtzman	Confer with J. Thompson re production of bank statements	0.1	515.00	51.50
11/1/2019	Beth Holtzman	Draft responses to defendants request for production of documents	1.6	515.00	824.00
11/1/2019	Beth Holtzman	Draft responses to defendants request for production	0.8	515.00	412.00
11/1/2019	Beth Holtzman	Contact named plaintiff re documents for production	0.1	515.00	51.50
11/1/2019	Beth Holtzman	Draft responses to defendants request for production of documents	0.8	515.00	412.00
11/1/2019	Laura Ho	Strategy w/ B. Holtzman re discovery responses	0.3	990.00	297.00
11/1/2019	Jacqueline Thompson	Review email exchange re document production	0.8	365.00	292.00
11/1/2019	Jacqueline Thompson	Exchange emails re loading plaintiff produced documents into summation	0.4	365.00	146.00
11/1/2019	Stuart Kirkpatrick	Add additional Dixon production documents to Summation for B. Holtzman	0.4	350.00	140.00
11/1/2019	Stuart Kirkpatrick	Review Summation production coding and email summary to Beth Holtzman and J. Thompson re: preparation for discovery production	0.5	350.00	175.00
11/1/2019	Stuart Kirkpatrick	Redact production documents in Summation	1.8	350.00	630.00
11/1/2019	Jacqueline Thompson	Review and exchange emails ESI	0.1	365.00	36.50
11/3/2019	Beth Holtzman	Review and L. Ho edit's to responses to defendants' request for production	0.2	515.00	103.00
11/3/2019	Laura Ho	Review and revise request for production of documents responses and correspondence w/ B. Holtzman re edits	0.8	990.00	792.00
11/4/2019	Beth Holtzman	Draft responses to defendants request for production of documents	1.2	515.00	618.00
11/4/2019	Beth Holtzman	Draft responses to defendants request for production of documents	1.3	515.00	669.50
11/4/2019	Beth Holtzman	Research common interest and joint prosecution privilege	0.8	515.00	412.00
11/4/2019	Beth Holtzman	Confer with L. Ho re common interest privilege and applicability to responses to defendant's request for production of documents	0.1	515.00	51.50
11/4/2019	Laura Ho	Edits to and finalizing discovery responses	1.2	990.00	1188.00
11/4/2019	Beth Holtzman	Draft responses to defendants request for production of documents	0.2	515.00	103.00
11/4/2019	Beth Holtzman	Finalize, sign, and serve responses to defendant's request for production of documents	0.2	515.00	103.00
11/4/2019	Beth Holtzman	Confer with S. Kirkpatrick re filing and serving responses to defendant's request for production of documents	0.1	515.00	51.50
11/4/2019	Laura Ho	Correspondence w/ opposing counsel re class list	0.1	990.00	99.00
11/4/2019	Stuart Kirkpatrick	Review ESI agreement and draft email to Beth Holtzman and J. Thompson re: redacting privileged information in csv/load files in preparation for running Summation document production	0.7	350.00	245.00
11/4/2019	Stuart Kirkpatrick	Finalize and serve responses to defendant's document requests, for Beth Holtzman	0.6	350.00	210.00
11/4/2019	Jacqueline Thompson	Review and respond to Beth Holtzman re verification	0.6	365.00	219.00
11/4/2019	Jacqueline Thompson	Review email from S. Kirkpatrick re ESI agreement	0.1	365.00	36.50
11/4/2019	Jacqueline Thompson	Review emails response re document production	0.1	365.00	36.50
11/5/2019	Beth Holtzman	Review documents from plaintiff, determine redactions	0.2	515.00	103.00
11/5/2019	Jacqueline Thompson	Review and response to email from Beth Holtzman re document production	0.2	365.00	73.00
11/6/2019	Beth Holtzman	Review defendants' recent production and determine if ESI problem	0.2	515.00	103.00
11/6/2019	Beth Holtzman	Follow-up re metadata of latest production	0.1	515.00	51.50
11/6/2019	Stuart Kirkpatrick	Download and analyze load file data from Defendant's Prod003, and email Beth Holtzman and J. Thompson re: contents and missing email subject metadata	0.4	350.00	140.00
11/6/2019	Jacqueline Thompson	Review email exchange re ESI production	0.2	365.00	73.00
11/11/2019	Beth Holtzman	Follow up with plaintiff re producing cell phone bills	0.1	515.00	51.50
11/11/2019	Laura Ho	Review Sadina's memo re Belaire and briefing schedule	0.2	990.00	198.00
11/12/2019	Laura Ho	Correspondence w/ Seltz counsel re briefing schedule	0.1	990.00	99.00
11/14/2019	Beth Holtzman	Review document production from defendant	0.1	515.00	51.50
11/18/2019	Jacqueline Thompson	Review email exchange re retrieving defendant document production	0.2	365.00	73.00
11/18/2019	Beth Holtzman	Review defendants' recent production	0.2	515.00	103.00

Date	Professional	Narrative	Hours	Rate	Amount
11/18/2019	Stuart Kirkpatrick	Download Cushman Prod003 Email Subject metadata in supplemental load file, and transmit to Summation for import into case project	0.3	350.00	105.00
11/20/2019	Beth Holtzman	Review Belaire notice	0.4	515.00	206.00
11/20/2019	Beth Holtzman	Review correspondence to send to collective list	0.1	515.00	51.50
11/20/2019	Laura Ho	Conference w/ B. Holtzman re Belaire and document production	0.2	990.00	198.00
11/20/2019	Laura Ho	Correspondence w/ opposing counsel re Belaire	0.1	990.00	99.00
11/20/2019	Laura Ho	Correspondence w/ Seltz counsel re revisions to letter to collective	0.3	990.00	297.00
11/21/2019	Beth Holtzman	Follow up with S. Kirkpatrick re preparing documents for production	0.2	515.00	103.00
11/21/2019	Beth Holtzman	Review documents and redactions in preparation for production	1.3	515.00	669.50
11/21/2019	Beth Holtzman	Correspondence with plaintiff re obtaining documents for production	0.1	515.00	51.50
11/21/2019	Stuart Kirkpatrick	Review Cushman production documents in Summation and email reply to Beth Holtzman re: filtering for attorney review in preparation for production	0.3	350.00	105.00
11/21/2019	Stuart Kirkpatrick	Email sample redacted phone bill to Beth Holtzman	0.1	350.00	35.00
11/21/2019	Stuart Kirkpatrick	Import additional document to Summation and code for production per Beth Holtzman instructions	0.2	350.00	70.00
11/21/2019	Jacqueline Thompson	Review email exchange between S. Kirkpatrick and Beth Holtzman re document production	0.4	365.00	146.00
11/22/2019	Beth Holtzman	Review documents and prepare for production	1.6	515.00	824.00
11/22/2019	Beth Holtzman	Review documents and prepare for production	0.4	515.00	206.00
11/22/2019	Beth Holtzman	Review documents and prepare for production	0.6	515.00	309.00
11/22/2019	Stuart Kirkpatrick	Import additional documents to Summation and code for production, for Beth Holtzman	0.4	350.00	140.00
11/25/2019	Beth Holtzman	Review documents and prepare for production	0.2	515.00	103.00
11/25/2019	Beth Holtzman	Confer with S. Kirkpatrick re preparing documents for production	0.1	515.00	51.50
11/25/2019	Beth Holtzman	Review proposed stipulation re Bealire notice	0.1	515.00	51.50
11/25/2019	Beth Holtzman	Review documents and prepare for production	1.7	515.00	875.50
11/25/2019	Stuart Kirkpatrick	Review production set in Summation and exchange communication with Beth Holtzman re: generating production in compliance with ESI agreement	0.5	350.00	175.00
11/25/2019	Stuart Kirkpatrick	Run DIXON production set through Summation, and review load file, images, and redactions for compliance with ESI agreement and to identify and troubleshoot errors	2.1	350.00	735.00
11/25/2019	Stuart Kirkpatrick	Add additional production document, and redaction marks, to Summation for Beth Holtzman	0.3	350.00	105.00
11/25/2019	Stuart Kirkpatrick	Add Confidential designation to production document, for Beth Holtzman	0.1	350.00	35.00
12/2/2019	Beth Holtzman	Confer with S. Kirkpatrick re preparing document production	0.1	515.00	51.50
12/2/2019	Beth Holtzman	Review documents in preparation for production	0.5	515.00	257.50
12/2/2019	Beth Holtzman	Review documents in preparation for production	0.1	515.00	51.50
12/2/2019	Beth Holtzman	Review documents in preparation for production	0.7	515.00	360.50
12/2/2019	Stuart Kirkpatrick	Run DIXON production in Summation Beth Holtzman review	0.6	350.00	210.00
12/2/2019	Stuart Kirkpatrick	Review DIXON production images and email Beth Holtzman re: redaction edits	0.5	350.00	175.00
12/2/2019	Stuart Kirkpatrick	Edit DIXON production document redactions in Summation per Beth Holtzman instructions	0.3	350.00	105.00
12/2/2019	Stuart Kirkpatrick	Save and upload images of client's text conversations to Summation, for inclusion in DIXON production	0.5	350.00	175.00
12/3/2019	Beth Holtzman	Review documents in preparation for production	1.0	515.00	515.00
12/3/2019	Beth Holtzman	Review documents in preparation for production	0.6	515.00	309.00
12/3/2019	Stuart Kirkpatrick	Run updated production and review image files for redaction edits	0.7	350.00	245.00
12/3/2019	Stuart Kirkpatrick	Unitize and redact production documents per Beth Holtzman instructions	0.4	350.00	140.00
12/3/2019	Stuart Kirkpatrick	Re-run and review the updated DIXON production set prior to attorney final review before service	0.6	350.00	210.00
12/4/2019	Stuart Kirkpatrick	Review L. Ho email re: production set, and make further redactions per instructions	0.2	350.00	70.00
12/4/2019	Stuart Kirkpatrick	Review all production pages for social security numbers and birthdates to redact	0.6	350.00	210.00
12/4/2019	Beth Holtzman	Review documents for production	0.9	515.00	463.50
12/4/2019	Laura Ho	Review Dixon document production, correspondence w/ B. Holtzman re same	0.8	990.00	792.00

Date	Professional	Narrative	Hours	Rate	Amount
12/4/2019	Beth Holtzman	Correspondence with plaintiff re obtaining document for production	0.2	515.00	103.00
12/4/2019	Stuart Kirkpatrick	Reply to L. Ho and Beth Holtzman emails re: redactions v. Confidential designation of payroll statements, ESI agreement conditions for producing text messages, and redaction of privileged metadata from load file	0.4	350.00	140.00
12/4/2019	Jacqueline Thompson	Review and respond to S. Kirkpatrick re document prodction	0.3	365.00	109.50
12/5/2019	Beth Holtzman	Reviewed order granting stipulation regarding Belaire notice to putative california class members	0.1	515.00	51.50
12/5/2019	Stuart Kirkpatrick	Review Order re: Belaire notice and calendar deadlines into ProLaw	0.2	350.00	70.00
12/6/2019	Beth Holtzman	Confer with L. Ho and S. Kirkpatrick re document production ESI agreement and confidentiality	0.2	515.00	103.00
12/6/2019	Beth Holtzman	Review documents for production	0.2	515.00	103.00
12/6/2019	Stuart Kirkpatrick	Conference with L. Ho and Beth Holtzman re: producing native text message and LinkedIn message files	0.2	350.00	70.00
12/6/2019	Stuart Kirkpatrick	Research re: exporting and producing native text message and LinkedIn message files, and email potential solutions to Beth Holtzman to use with client	0.9	350.00	315.00
12/9/2019	Beth Holtzman	Review supplemental ESI production	0.1	515.00	51.50
12/9/2019	Stuart Kirkpatrick	Download Production 4 folder and transmit to Summation for import	0.2	350.00	70.00
12/9/2019	Jacqueline Thompson	Review email and document production from defendant	0.1	365.00	36.50
12/10/2019	Beth Holtzman	Review which text messages and linkedin messages will be produced	0.2	515.00	103.00
12/10/2019	Beth Holtzman	Email plaintiff re which documents are needed for production	0.1	515.00	51.50
12/10/2019	Laura Ho	Correspondence w/ CPT re Belaire	0.2	990.00	198.00
12/10/2019	Beth Holtzman	Review formatted Belaire notice and postcard	0.2	515.00	103.00
12/11/2019	Beth Holtzman	Review text message metadata from plaintiff	0.2	515.00	103.00
12/11/2019	Laura Ho	Correspondence w/ CPT re Belaire drafts	0.1	990.00	99.00
12/11/2019	Beth Holtzman	Correspondence with named plaintiff re documents for production	0.1	515.00	51.50
12/11/2019	Beth Holtzman	Review defendants' privilege log	0.2	515.00	103.00
12/11/2019	Laura Ho	Review and respond to opposing counsel communication re Dixon documents	0.2	990.00	198.00
12/11/2019	Stuart Kirkpatrick	Review test message metadata from D. Dixon adn email B. Holtzman re: ability to link metadata to screenshot images of corresponding text messages for production	0.6	350.00	210.00
12/12/2019	Beth Holtzman	Correspondence with named plaintiff re document production	0.3	515.00	154.50
12/12/2019	Beth Holtzman	Prepare documents for production	0.9	515.00	463.50
12/12/2019	Stuart Kirkpatrick	Conference with B. Holtzman re: coding documents with Confidential designation, in preparation for running production set	0.1	350.00	35.00
12/12/2019	Stuart Kirkpatrick	Reply to B. Holtzman email and code wage statement production documents per instructions	0.4	350.00	140.00
12/12/2019	Beth Holtzman	Review documents for production	0.6	515.00	309.00
12/12/2019	Beth Holtzman	Review defendant's production of documents	0.4	515.00	206.00
12/13/2019	Beth Holtzman	Review documents for production	0.5	515.00	257.50
12/13/2019	Laura Ho	Correspondence w/ S. Kirkpatrick re document production	0.1	990.00	99.00
12/13/2019	Stuart Kirkpatrick	Review and edit Summation production to remove documents with imaging errors for later supplemental production, and finalize 2019-12-13 DIXON production set for service to opposing counsel	3.4	350.00	1190.00
12/13/2019	Stuart Kirkpatrick	Upload and serve 2019-12-13 DIXON production set to opposing counsel	0.2	350.00	70.00
12/16/2019	Beth Holtzman	Review status of document production	0.1	515.00	51.50
12/16/2019	Stuart Kirkpatrick	Zip production folder and email link to opposing counsel for download	0.2	350.00	70.00
12/16/2019	Stuart Kirkpatrick	Edit image files outside of Summation and write dii load file to import security-free image files, in preparation for running supplemental document production	2.1	350.00	735.00
12/17/2019	Stuart Kirkpatrick	Work with Summation to troubleshoot imaging errors on undredacted supplemental production documents	0.3	350.00	105.00
12/19/2019	Beth Holtzman	Working call with L. Ho, Dierdre Aaron, Pam Disney, Justin Swarz, Paolo Miereles, Molly Frandsen re strategy for 216(b) motion and contacting potential declarants	0.5	515.00	257.50
12/19/2019	Laura Ho	Strategy w/ Seltz counsel re 216(b)	0.5	990.00	495.00
12/23/2019	Stuart Kirkpatrick	Run test production of supplemental documents, and email Beth Holtzman re: reviewing tiffs in preparation for service	0.5	350.00	175.00
12/23/2019	Beth Holtzman	Review supplemental document production	0.1	515.00	51.50

Date	Professional	Narrative	Hours	Rate	Amount
1/6/2020	Stuart Kirkpatrick	Download production documents from opposing counsel and transmit set to Summation for upload to case folder	0.3	350.00	105.00
1/6/2020	Jacqueline Thompson	Review email exchange re production	0.2	365.00	73.00
1/12/2020	Laura Ho	Correspondence w/ K. Kukla re settlement	0.2	990.00	198.00
1/13/2020	Beth Holtzman	Preparation for Cushman check-in with Seltz counsel	0.2	515.00	103.00
1/13/2020	Beth Holtzman	Document review	0.2	515.00	103.00
1/14/2020	Beth Holtzman	Conference call with L. Ho, Dierdre Aaron, Justin Swartz re strategy for 216(b) motion	0.4	515.00	206.00
1/14/2020	Laura Ho	Phone call w/ B. Holtzman, J. Schwartz, and D. Aaron re 216(b) and settlement strategy	0.4	990.00	396.00
1/14/2020	Laura Ho	Conference w/ S. Grimes re data analysis	0.2	990.00	198.00
1/16/2020	Scott Grimes (stat)	Revise damages calculations	1.5	390.00	585.00
1/16/2020	Laura Ho	Strategy w/ S. Grimes re different damages scenarios	0.2	990.00	198.00
1/16/2020	Laura Ho	Correspondence w/ D. Aaron re different damages scenarios	0.3	990.00	297.00
1/17/2020	Beth Holtzman	Conference call with L. Ho and Dierdre Aaron re strategy for settlement negotiations	0.4	515.00	206.00
1/17/2020	Beth Holtzman	Review notes from previous mediation re junior appraisers	0.2	515.00	103.00
1/17/2020	Laura Ho	Phone call w/ D. Aaron and B. Holtzman re settlement damages analysis	0.4	990.00	396.00
1/17/2020	Laura Ho	Correspondence w/ CPT re Belaire list	0.1	990.00	99.00
1/17/2020	Beth Holtzman	Review written stipulation and order for Belaire notice re timeline for release of contact information of class list	0.2	515.00	103.00
1/22/2020	Laura Ho	Phone call w/ D. Rotman re settlement and memo to team re status	0.3	990.00	297.00
1/22/2020	Laura Ho	Review Belaire list and memo to B. Holtzman and J. Thompson re call project	0.2	990.00	198.00
2/4/2020	Beth Holtzman	Working meeting with L. Ho and J. Thompson re preparing script and call list for call project	0.2	515.00	103.00
2/4/2021	Laura Ho	Working meeting with B. Holtzman and J. Thompson re preparing script and call list for call project	0.2	990.00	198.00
2/4/2020	Beth Holtzman	Prepare interview script for call project re recoverable draw and job duties	0.6	515.00	309.00
2/4/2020	Jacqueline Thompson	Conference w/ L. Ho and Beth Holtzman re witness calls	0.2	365.00	73.00
2/7/2020	Beth Holtzman	Prepare interview script for class member interviews	0.3	515.00	154.50
2/10/2020	Beth Holtzman	Review draft 216(b) motion for Seltz case	0.7	515.00	360.50
2/11/2020	Beth Holtzman	Draft call script for class member interviews	1.0	515.00	515.00
2/11/2020	Laura Ho	Further review and revise interview script	0.3	990.00	297.00
2/21/2020	Laura Ho	Strategy and communication to S. Montani re settlement	0.3	990.00	297.00
2/24/2020	Jacqueline Thompson	Email exchange w/ S. Kirkpatrick re communications to class members on belaire list	0.3	365.00	109.50
2/24/2020	Stuart Kirkpatrick	Review interview script in preparation for calls to potential class members	0.2	350.00	70.00
2/24/2020	Beth Holtzman	Confer with S. Kirkpatrick re finalizing class list interview script	0.1	515.00	51.50
2/24/2020	Stuart Kirkpatrick	Conference with B. Holtzman re: editing call script and creating case email address	0.1	350.00	35.00
2/24/2020	Stuart Kirkpatrick	Create case email address in Office365	0.2	350.00	70.00
2/24/2020	Jacqueline Thompson	Finalize interview notes re Jesus Becerra	0.4	365.00	146.00
2/24/2020	Laura Ho	Strategy w/ J. Schwartz and S. Abrahamson re settlement	0.6	990.00	594.00
2/24/2020	Jacqueline Thompson	Phone calls and interviews w/ class members	0.5	365.00	182.50
2/25/2020	Beth Holtzman	Confer with J. Thompson re reviewing class members questions re promissory notes and guaranteed draw	0.2	515.00	103.00
2/25/2020	Beth Holtzman	Review Cushman guaranteed draw versus recoverable draw	0.1	515.00	51.50
2/25/2020	Stuart Kirkpatrick	Review and edit call script in preparation for appraiser interviews	0.2	350.00	70.00
2/25/2020	Stuart Kirkpatrick	Leave voicemail for [REDACTED] re: case investigation	0.1	350.00	35.00
2/25/2020	Stuart Kirkpatrick	Left voicemail for [REDACTED] re: case investigation	0.1	350.00	35.00
2/25/2020	Stuart Kirkpatrick	Left voicemail for [REDACTED] re: case investigation	0.1	350.00	35.00
2/25/2020	Jacqueline Thompson	Phone interview calls to witnesses on belaire list, update chart re same	1.0	365.00	365.00
2/25/2020	Jacqueline Thompson	Phone calls and interviews	0.9	365.00	328.50
2/25/2020	Jacqueline Thompson	Email exchange w/ L. Ho re [REDACTED]	0.2	365.00	73.00
2/25/2020	Laura Ho	Review and respond to J. Thompson intake re [REDACTED]	0.4	990.00	396.00
2/25/2020	Jacqueline Thompson	Review email and discussion w/ Beth Holtzman re recoverable draw and witness phone calls, review memo re same	0.4	365.00	146.00

Date	Professional	Narrative	Hours	Rate	Amount
2/25/2020	Jacqueline Thompson	Exchange email w/ L. Ho re witness interviews	0.2	365.00	73.00
2/26/2020	Stuart Kirkpatrick	Update interview spreadsheet based on new policy of not calling numbers with extensions	0.2	350.00	70.00
2/26/2020	Stuart Kirkpatrick	Left voicemail for [REDACTED] re: case investigation	0.1	350.00	35.00
2/26/2020	Stuart Kirkpatrick	Phone call with [REDACTED] re: case investigation	0.1	350.00	35.00
2/26/2020	Stuart Kirkpatrick	Phone call with [REDACTED] re: case investigation	0.1	350.00	35.00
2/26/2020	Stuart Kirkpatrick	Email summary of call notes from [REDACTED] interview to B. Holtzman	0.1	350.00	35.00
2/26/2020	Beth Holtzman	Confer with L. Ho re status of class member interview call project	0.1	515.00	51.50
2/26/2020	Laura Ho	Correspondence w/ S. Montani re settlement	0.1	990.00	99.00
2/28/2020	Laura Ho	Review and revise NEL for [REDACTED] individual claims	0.2	990.00	198.00
2/28/2020	Jacqueline Thompson	Draft non-engagement letter to [REDACTED]	0.3	365.00	109.50
2/28/2020	Jacqueline Thompson	Exchange correspondence w/ L. Ho re non-engagement letter to [REDACTED]	0.2	365.00	73.00
3/3/2020	Jacqueline Thompson	Witness interview phone calls to [REDACTED] and K. McCormack, update chart re same	0.8	365.00	292.00
3/5/2020	Laura Ho	Phone call w/ opposing counsel and Seltz counsel re settlement	0.2	990.00	198.00
3/5/2020	Laura Ho	Draft communciation re settlement numbers for opposing counsel	0.8	990.00	792.00
3/5/2020	Beth Holtzman	Correspondence with Seltz counsel re settlement offer	0.1	515.00	51.50
3/5/2020	Scott Grimes (stat)	Review payroll data re employees with recoverable draw	0.4	390.00	156.00
3/5/2020	Scott Grimes (stat)	Memo to L. Ho re class members per state with recoverable draws	0.4	390.00	156.00
3/10/2020	Jacqueline Thompson	Witness interview phone calls to [REDACTED], and K. McCormack.	0.3	365.00	109.50
3/10/2020	Jacqueline Thompson	Phone interview w/ [REDACTED].	0.6	365.00	219.00
3/10/2020	Jacqueline Thompson	Update tracking chart re phone witness calls and interviews	0.3	365.00	109.50
3/10/2020	Jacqueline Thompson	Draft interview notes re phone call w/ [REDACTED].	0.5	365.00	182.50
3/10/2020	Jacqueline Thompson	Phone interview w/ K. McCormack.	0.5	365.00	182.50
3/10/2020	Jacqueline Thompson	Draft witness interview re K. McCormack.	0.5	365.00	182.50
3/25/2020	Beth Holtzman	Correspondence with Seltz counsel and opposing counsel re settlement negotiations	0.1	515.00	51.50
4/3/2020	Beth Holtzman	Review correspondence re status of mediation and call project	0.1	515.00	51.50
4/3/2020	Beth Holtzman	Review interview scripts with current and former Cushman appraisers	0.2	515.00	103.00
4/3/2020	Jacqueline Thompson	Review and respond to correspondence from L. Ho re witness calls	0.1	365.00	36.50
4/9/2020	Beth Holtzman	Review interview scripts with current and former Cushman appraisers	0.3	515.00	154.50
4/10/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re status of settlement negotiations	0.1	515.00	51.50
4/10/2020	Jacqueline Thompson	Revoew and udatre witness tracking chart	0.6	365.00	219.00
4/13/2020	Beth Holtzman	Review Cushman call project tracking report and completed interviews	0.4	515.00	206.00
4/13/2020	Beth Holtzman	Working meeting with L. Ho and J. Thompson re status of call project	0.3	515.00	154.50
4/13/2020	Laura Ho	Phone call w/ B. Holtzman and J. Thompson re witness call status	0.3	990.00	297.00
4/13/2020	Jacqueline Thompson	Review case file re communcation w/ [REDACTED], email to S. Kirkpatrick re same	0.2	365.00	73.00
4/13/2020	Jacqueline Thompson	Conference w/ Beth Holtzman and L. Ho re interviews with witnesses	0.3	365.00	109.50
4/14/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re status of settlement negotiations	0.1	515.00	51.50
4/14/2020	Laura Ho	Phone call w/ opposing counsel, S. Abrahamson re settlement status	0.3	990.00	297.00
4/14/2020	Laura Ho	Correspondence w/ S. Abrahamsom re Colorado case	0.2	990.00	198.00
4/14/2020	Stuart Kirkpatrick	Left voicemail for [REDACTED] re: case investigation	0.1	350.00	35.00
4/14/2020	Jacqueline Thompson	Exchange correspondnce w/ S. Kirkpatrick re phone call to [REDACTED].	0.1	365.00	36.50
4/15/2020	Beth Holtzman	Review correspondence with Sally Abrahamson, Justin Swartz re status of settlement negotiations and Colorado case	0.1	515.00	51.50
4/17/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re status of settlement negotiations	0.1	515.00	51.50
4/17/2020	Beth Holtzman	Review proposed scheduling order in Colorado Cushman case and Cushman's motion for partial summary judgment	0.7	515.00	360.50
4/22/2020	Beth Holtzman	Review court order re motion for summary judgment and conditional certification in Colorado Cushman case	0.3	515.00	154.50
4/22/2020	Laura Ho	Strategy w/ Seltz counsel re Colorado case	0.2	990.00	198.00
4/24/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re status of settlement negotiations	0.1	515.00	51.50

Date	Professional	Narrative	Hours	Rate	Amount
4/27/2020	Beth Holtzman	Correspondence with Sally Abrahamson re status of settlement negotiations	0.1	515.00	51.50
4/29/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re updates in Colorado Cushman case	0.2	515.00	103.00
4/29/2020	Laura Ho	Phone call w/ S. Abrahamson and S. Montani re Bursey and settlement status	0.2	990.00	198.00
5/1/2020	Jacqueline Thompson	Exchange correspondence w/ S. Kirkpatrick re [REDACTED]	0.1	365.00	36.50
5/7/2020	Beth Holtzman	Review correspondence from Sally Abrahamson re updates in Colorado Cushman case	0.1	515.00	51.50
5/7/2020	Laura Ho	Strategy w/ S. Abrahamson re Bursey	0.2	990.00	198.00
5/7/2020	Laura Ho	Correspondence w/ opposing counsel re Bursey and settlement	0.2	990.00	198.00
5/8/2020	Beth Holtzman	Review correspondence with opposing counsel (Sadina Montani) re updates in Colorado Cushman and potential settlement negotiations	0.1	515.00	51.50
5/13/2020	Laura Ho	Phone call w/ opposing counsel and Seltz counsel re mediation status	0.2	990.00	198.00
5/13/2020	Laura Ho	Phone call w/ S. Abrahamson re 216b and mediation strategy	0.2	990.00	198.00
5/18/2020	Jacqueline Thompson	Review correspondence between L. Ho and D. Dixon re case update	0.1	365.00	36.50
5/19/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re proposed stipulation to conditional certification	0.1	515.00	51.50
5/19/2020	Laura Ho	Phone call w/ opposing counsel and Seltz counsel re settlement, conditional cert and case schedule	0.2	990.00	198.00
5/19/2020	Laura Ho	Strategy w/ S. Abrahamson re conditional cert	0.2	990.00	198.00
5/19/2020	Laura Ho	Correspondence w/ B. Holtzman re case management conference statement	0.1	990.00	99.00
5/19/2020	Beth Holtzman	Draft case management conference statement	0.4	515.00	206.00
5/19/2020	Jacqueline Thompson	Review correspondence between L. Ho and Beth Holtzman re case management conference	0.1	365.00	36.50
5/20/2020	Beth Holtzman	Review correspondence with opposing counsel (Sadina Montani) re consenting to conditional certification and case management conference statement	0.1	515.00	51.50
5/20/2020	Beth Holtzman	Review docket and prior case management conference statement in preparation for upcoming case management conference	1.8	515.00	927.00
5/20/2020	Beth Holtzman	Conference call with L. Ho re strategy for case management conference statement and discovery	0.4	515.00	206.00
5/20/2020	Laura Ho	Correspondence w/ B. Holtzman re litigation schedule	0.2	990.00	198.00
5/20/2020	Laura Ho	Phone call w/ B. Holtzman re strategy for updating case management conference statement and litigations schedule	0.5	990.00	495.00
5/20/2020	Jacqueline Thompson	Review correspondence between L. Ho and Beth Holtzman re stipulation re scheduling	0.2	365.00	73.00
5/21/2020	Beth Holtzman	Correspondence with Sally Abrahamson re case management conference and scheduling	0.1	515.00	51.50
5/21/2020	Beth Holtzman	Analyze status of discovery requests and responses in Dixon and Seltz matters	3.6	515.00	1854.00
5/21/2020	Laura Ho	Correspondence w/ Seltz counsel re coordinating changing litigation schedule	0.1	990.00	99.00
5/21/2020	Beth Holtzman	Review and analyze documents produced by defendants	2.4	515.00	1236.00
5/22/2020	Beth Holtzman	Conference call with L. Ho, Sally Abrahamson, Molly Frandsen re updating schedule and strategy for 216(b) motion and discovery	0.5	515.00	257.50
5/22/2020	Beth Holtzman	Conference call with L. Ho re case management conference statement and strategy for discovery	0.2	515.00	103.00
5/22/2020	Beth Holtzman	Review and analyze documents produced by defendants	1.6	515.00	824.00
5/22/2020	Beth Holtzman	Review correspondence with Seltz counsel re coordinating scheduling and consenting to conditional certification	0.1	515.00	51.50
5/22/2020	Laura Ho	Draft memo to S. Grimes re data analysis	0.1	990.00	99.00
5/22/2020	Laura Ho	Phone call w/ Seltz counsel and B. Holtzman re 216(b) motions, discovery, litigation schedule	0.5	990.00	495.00
5/22/2020	Jacqueline Thompson	Review email exchange re data	0.1	365.00	36.50
5/22/2020	Scott Grimes (stat)	Memo to L. Ho re data produced for settlement	0.3	390.00	117.00
5/25/2020	Laura Ho	Review and revise case management conference statement draft and correspondence w/ Seltz counsel re same	1.2	990.00	1188.00
5/26/2020	Beth Holtzman	Draft case management conference statement	1.2	515.00	618.00
5/26/2020	Beth Holtzman	Draft case management conference statement	0.2	515.00	103.00
5/26/2020	Beth Holtzman	Draft case management conference statement (incorporate L. Ho edits)	0.6	515.00	309.00

Date	Professional	Narrative	Hours	Rate	Amount
5/26/2020	Beth Holtzman	Correspondence with Sally Abrahamson re case management conference statement and schedule	0.1	515.00	51.50
5/27/2020	Beth Holtzman	Draft case management conference statement and incorporate opposing counsel (Sadina Montani) edits	0.4	515.00	206.00
5/27/2020	Beth Holtzman	Review case management conference statement in preparation for filing	0.2	515.00	103.00
5/27/2020	Laura Ho	Phone call w/ S. Montani and S. Abrahamson re litigation deadlines	0.2	990.00	198.00
5/27/2020	Laura Ho	Finalize case management conference statement for filing	0.2	990.00	198.00
5/27/2020	Stuart Kirkpatrick	Finalize Joint case management conference statement with exhibit, efile pdf, and email Word version of proposed order to Judge Corley	0.3	350.00	105.00
5/27/2020	Jacqueline Thompson	Review correspondec between Beth Holtzman and S. Kirkpatrick re filing case management conference statement	0.2	365.00	73.00
5/28/2020	Beth Holtzman	Review joint motion to revise scheduling order in Seltz	0.2	515.00	103.00
5/28/2020	Laura Ho	Correspondence w/ M. Frandsen re Setlz scheduling order	0.3	990.00	297.00
5/28/2020	Jacqueline Thompson	Review email exchange re case management conference statement	0.2	365.00	73.00
6/5/2020	Beth Holtzman	Review documents produced by defendants	1.4	515.00	721.00
6/8/2020	Beth Holtzman	Review documents produced by defendants	0.8	515.00	412.00
6/9/2020	Beth Holtzman	Analyze Deirdre Aaron notes on document production and deficit production	0.5	515.00	257.50
6/9/2020	Beth Holtzman	Conference call with L. Ho, Sally Abrahamson, Molly Frandsen, Logan Pardell re status of discovery and strategy for 216(b) motions	0.3	515.00	154.50
6/9/2020	Laura Ho	Phone call w/ Seltz counsel and B. Holtzman re 216(b) motions and discovery meet and confer	0.6	990.00	594.00
6/9/2020	Beth Holtzman	Review notes from interviews with current and former Cushman employees with recoverable draws	0.4	515.00	206.00
6/9/2020	Beth Holtzman	Review draft motion for conditional certification for Seltz matter	0.4	515.00	206.00
6/9/2020	Jacqueline Thompson	Exchange correspondec w/ L. Ho, Beth Holtzman and S. Kirkpatrick re team meeting (.1), review correspondec re completed interviews (.1)	0.2	365.00	73.00
6/10/2020	Beth Holtzman	Working meeting with L. Ho, S. Kirkpatrick, J. Thompson re strategy and division of tasks for 216(b) motion filing	0.4	515.00	206.00
6/10/2020	Beth Holtzman	Analyze data produced by defendants	0.4	515.00	206.00
6/10/2020	Laura Ho	Phone call w/ B. Holtzman, J. Thompson, S. Kirkpatrick re 216(b) motion and discovery	0.5	990.00	495.00
6/10/2020	Laura Ho	Correspondence w/ S. Grimes re data declaration	0.1	990.00	99.00
6/10/2020	Beth Holtzman	Correspondence with Molly Frandsen, Sally Abrahamson re document production	0.2	515.00	103.00
6/10/2020	Beth Holtzman	Review documents produced by Defendant and determine whether deficient discovery responses	0.9	515.00	463.50
6/10/2020	Stuart Kirkpatrick	Conference with L. Ho, Beth Holtzman, and J. Thompson re: filing deadlines and interview project	0.4	350.00	140.00
6/10/2020	Jacqueline Thompson	Conference w/ L. Ho, Beth Holtzman, S. Kirkpatrick (.2), Review correspondence from L. Ho to S. Grimes re data (.1), review correspondence re document production (.1)	0.4	365.00	146.00
6/10/2020	Jacqueline Thompson	Review correspondence from L. Ho to S. Grimes re data	0.1	365.00	36.50
6/10/2020	Scott Grimes (stat)	Review damages calculations and underlying data re motion for conditional certification	2.9	390.00	1131.00
6/11/2020	Beth Holtzman	Correspondence with Molly Frandsen re document production	0.2	515.00	103.00
6/11/2020	Beth Holtzman	Review information on potential opt-in	0.2	515.00	103.00
6/11/2020	Beth Holtzman	Review documents produced by cushman	0.2	515.00	103.00
6/11/2020	Stuart Kirkpatrick	Download Cushman production CW_000001-862 and upload to Summation for import into case project	0.4	350.00	140.00
6/11/2020	Scott Grimes (stat)	Analyze earnings data re motion for conditional certification	3.2	390.00	1248.00
6/11/2020	Jacqueline Thompson	Review correspondence re document production	0.1	365.00	36.50
6/12/2020	Beth Holtzman	Review plaintiff (Dimitri Dixon) employment history	0.3	515.00	154.50
6/12/2020	Stuart Kirkpatrick	Analyze Outten Golden interviews with class members, and transmit interview notes to GBDH interview template, in preparation for follow-up interview on recoverable draw and work experience	1.1	350.00	385.00
6/12/2020	Jacqueline Thompson	Review correspondence re defendant produced documents (.2); review correspondence between S. Grimes and Beth Holtzman re Cushman's data (.1)	0.3	365.00	109.50
6/15/2020	Beth Holtzman	Review notes from interviews with former cushman appraisers and evaluate potential claims	0.2	515.00	103.00
6/15/2020	Beth Holtzman	Draft solicitation and consent to joint form for opt-ins	2.0	515.00	1030.00

Date	Professional	Narrative	Hours	Rate	Amount
6/15/2020	Beth Holtzman	Review documents produced by Defendant and determine whether deficient discovery re recoverable draws	2.1	515.00	1081.50
6/15/2020	Laura Ho	Review C. Wilson and Dickerson intakes and correspondence w/ S. Kirkpatrick and B. Holtzman re declaration and consent to join drafting	1.2	990.00	1188.00
6/15/2020	Stuart Kirkpatrick	Interview C. Wilson re: revocable draw and employment with C&W, and draft interview notes for attorney review	0.8	350.00	280.00
6/15/2020	Laura Ho	Correspondence w/ S. Abrahamson re discovery meet and confer	0.2	990.00	198.00
6/15/2020	Laura Ho	Phone call w/opposing counsel re settlement status	0.2	990.00	198.00
6/15/2020	Stuart Kirkpatrick	Review and save C. Wilson documentation to I Drive for Beth Holtzman review	0.2	350.00	70.00
6/15/2020	Stuart Kirkpatrick	Interview John Dickerson re: recoverable draw and employment at C&W, and draft interview notes for attorney review	0.9	350.00	315.00
6/15/2020	Stuart Kirkpatrick	Leave voicemails for Heather Elliott and [REDACTED] to schedule interviews re: recoverable draw and employment with C&W	0.2	350.00	70.00
6/15/2020	Stuart Kirkpatrick	Analyze and save documentation from John Dickerson to I Drive, for Beth Holtzman review	0.2	350.00	70.00
6/16/2020	Laura Ho	Correspondence w/ Seltz counsel re discovery meet and confer	0.1	990.00	99.00
6/16/2020	Beth Holtzman	Review documents and determine whether Defendant's discovery responses are deficient	2.3	515.00	1184.50
6/16/2020	Beth Holtzman	Draft solicitation letter and consent to join form for opt-in	2.1	515.00	1081.50
6/16/2020	Beth Holtzman	Review interview notes with appraiser and determine whether potential declarant	0.8	515.00	412.00
6/16/2020	Laura Ho	Review S. Kirkpatrick interview memos and correspondence w/ B. Holtzman re CTJs and declaration for them	1.2	990.00	1188.00
6/16/2020	Laura Ho	Correspondence w/ B. Holtzman and S. Grimes re data re recoverable draw	0.2	990.00	198.00
6/16/2020	Stuart Kirkpatrick	Interview Heather Elliott re: recoverable draw and employment with C&W, and draft interview notes for attorney review	1.0	350.00	350.00
6/16/2020	Stuart Kirkpatrick	Brief phone call with [REDACTED] to schedule Friday interview re: recoverable draw and employment with C&W	0.1	350.00	35.00
6/16/2020	Stuart Kirkpatrick	Interview with Teresa Simone re: recoverable draw and employment with C&W, and draft interview notes for attorney review	0.8	350.00	280.00
6/16/2020	Jacqueline Thompson	Review correspondence from Beth Holtzman re Cushman data and promissory note (.1); review and respond to correspondence from Beth Holtzman re procedure for sending opt in consent to join forms (.1)	0.2	365.00	73.00
6/17/2020	Beth Holtzman	Review interview notes with former appraisers and draft declaration	0.9	515.00	463.50
6/17/2020	Beth Holtzman	Draft outline for 216(b) factual background and argument sections	1.5	515.00	772.50
6/17/2020	Beth Holtzman	Draft letter re discovery deficiencies with regards to discovery requests re recoverable draw and promissory notes	1.8	515.00	927.00
6/17/2020	Beth Holtzman	Review voicemail from potential opt-in (John Dickerson)	0.1	515.00	51.50
6/17/2020	Beth Holtzman	Draft consent to join and solicitation letters for opt-ins	0.3	515.00	154.50
6/17/2020	Beth Holtzman	Telephone call with potential opt-in (John Dickerson) re questions about consent to join	0.1	515.00	51.50
6/17/2020	Beth Holtzman	Review documents produced by defendants on recoverable draws	0.3	515.00	154.50
6/17/2020	Laura Ho	Correspondence w/ Seltz counsel re discovery meet and confer and ctjs	0.1	990.00	99.00
6/17/2020	Laura Ho	Review and revise discovery meet and confer, correspondence w/ B. Holtzman re same	0.3	990.00	297.00
6/17/2020	Laura Ho	Correspondence w/ S. Grimes re data	0.2	990.00	198.00
6/17/2020	Beth Holtzman	Review correspondence with opposing counsel (Sadina Montani) re deficient discovery responses and production	0.1	515.00	51.50
6/17/2020	Stuart Kirkpatrick	Draft and transmit four Consent to Join letters to C. Wilson, John Dickerson, Heather Elliot, and Teresa Simone via DocuSign	0.4	350.00	140.00
6/18/2020	Beth Holtzman	Review interviews of class members and draft declarations	0.5	515.00	257.50
6/18/2020	Jacqueline Thompson	Exchange correspondence w/ S. Kirkpatrick re document production	0.1	365.00	36.50
6/18/2020	Jacqueline Thompson	Review and respond to correspondence from Beth Holtzman re completed interviews	0.1	365.00	36.50
6/19/2020	Stuart Kirkpatrick	Left voicemail for [REDACTED] re: interview on recoverable draw and employment with C&W	0.1	350.00	35.00
6/22/2020	Beth Holtzman	Draft 216(b) motion	2.2	515.00	1133.00
6/22/2020	Laura Ho	Correspondence w/ Seltz counsel re discovery meet and confer w/ defense counsel	0.1	990.00	99.00
6/22/2020	Beth Holtzman	Review correspondence with Sally Abrahamson and opposing counsel (Sadina Montani) re addressing deficit discovery	0.1	515.00	51.50

Date	Professional	Narrative	Hours	Rate	Amount
6/22/2020	Beth Holtzman	Draft declaration for opt-in re recoverable draw	0.8	515.00	412.00
6/22/2020	Beth Holtzman	Review interview with opt-in and determine whether potential declarant	0.4	515.00	206.00
6/22/2020	Stuart Kirkpatrick	Save and transmit Teresa Simone Consent to Join form to Beth Holtzman and L. Ho	0.1	350.00	35.00
6/23/2020	Beth Holtzman	Draft 216(b) motion	5.8	515.00	2987.00
6/23/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re update re deficit discovery and 216(b) motions	0.1	515.00	51.50
6/23/2020	Beth Holtzman	Review opt-in consent to join forms in preparation for filing	0.1	515.00	51.50
6/23/2020	Laura Ho	Phone call w/ opposing counsel and Seltz counsel re discovery meet and confer	0.3	990.00	297.00
6/23/2020	Laura Ho	Phone call w/ S. Abrahamson re 216(b)	0.2	990.00	198.00
6/23/2020	Laura Ho	Correspondence w/ S. Kirkpatrick re filing consents to join	0.2	990.00	198.00
6/23/2020	Laura Ho	Draft memo to S. Montani re discovery meet and confer	0.3	990.00	297.00
6/23/2020	Beth Holtzman	Draft opt-in declaration re appraiser job duties and compensation	0.9	515.00	463.50
6/23/2020	Stuart Kirkpatrick	Assemble four Consent to Join forms, and efile Notice of Consent to Join forms in USDC Northern CA	0.7	350.00	245.00
6/23/2020	Beth Holtzman	Review documents produced by defendant	0.5	515.00	257.50
6/24/2020	Beth Holtzman	Draft 216(b) motion (argument section)	5.4	515.00	2781.00
6/24/2020	Beth Holtzman	Review correspondence with Sally Abrahamson and opposing counsel (Sadina Montani) re document production and opt-ins data	0.1	515.00	51.50
6/24/2020	Laura Ho	Review S. Abrahamson correspondence re policy documents defendant has not produced	0.2	990.00	198.00
6/24/2020	Beth Holtzman	Draft 216(b) motion (notice of motion; facts section)	3.2	515.00	1648.00
6/24/2020	Beth Holtzman	Analyze documents related to defendants' compensation policies	0.2	515.00	103.00
6/25/2020	Laura Ho	Review draft 216(b) brief and correspondence w/ B. Holtzman re additions	0.8	990.00	792.00
6/25/2020	Beth Holtzman	Draft 216(b) motion (incorporate L. Ho edits)	0.8	515.00	412.00
6/25/2020	Beth Holtzman	Review and analyze documents produced by defendants	2.7	515.00	1390.50
6/25/2020	Beth Holtzman	Working meeting with L. Ho, S. Grimes and J. Thompson re division of tasks for filing 216(b) motion	0.6	515.00	309.00
6/25/2020	Beth Holtzman	Confer with L. Ho re revising 216(b) draft and strategy for addressing salary basis issue	0.1	515.00	51.50
6/25/2020	Beth Holtzman	Draft 216(b) motion	1.0	515.00	515.00
6/25/2020	Laura Ho	Team meeting re 216(b) filing	0.6	990.00	594.00
6/25/2020	Laura Ho	Draft memo to Seltz counsel re 216(b) strategy	0.1	990.00	99.00
6/25/2020	Beth Holtzman	Review documents produced by class members (employment contracts, affidavits, email correspondence)	0.7	515.00	360.50
6/25/2020	Beth Holtzman	Review and analyze Dimitri Dixon's employment contracts and recoverable draw information	0.5	515.00	257.50
6/25/2020	Jacqueline Thompson	Conference w/ L. Ho, Beth Holtzman, S. Kirkpatrick and S. Grimes re consent to join, declarations memorandum of points and authorities filing on July 8 (.3); review and respond to correspondence from Beth Holtzman re hearing date (.2)	0.5	365.00	182.50
6/26/2020	Beth Holtzman	Working meeting with L. Ho and S. Grimes re analyzing data and determining opt-in claims	1.3	515.00	669.50
6/26/2020	Beth Holtzman	Analyze opt-in employment contracts and documents	0.9	515.00	463.50
6/26/2020	Beth Holtzman	Draft 216(b) motion	0.5	515.00	257.50
6/26/2020	Beth Holtzman	Analyze employment contracts and compensation plans produced by defendants	0.4	515.00	206.00
6/26/2020	Laura Ho	Strategy w/ S. Grimes and B. Holtzman re data analysis and 216(b)	1.3	990.00	1287.00
6/26/2020	Stuart Kirkpatrick	Export documents from Summation as OCR pdfs, for Beth Holtzman review	0.2	350.00	70.00
6/26/2020	Jacqueline Thompson	Respond to correspondence from S. Kirkpatrick re update on conference call	0.1	365.00	36.50
6/29/2020	Beth Holtzman	Draft declaration for opt-in	1.1	515.00	566.50
6/29/2020	Beth Holtzman	Draft 216(b) motion	2.5	515.00	1287.50
6/29/2020	Beth Holtzman	Review notes from interview with potential opt-ins and evaluate claims	0.4	515.00	206.00
6/29/2020	Beth Holtzman	Draft declaration for named plaintiff (Dimitri Dixon)	0.4	515.00	206.00
6/29/2020	Stuart Kirkpatrick	Export OCR pdfs of requested Summation documents to Beth Holtzman	0.2	350.00	70.00
6/29/2020	Beth Holtzman	Review documents produced by defendants	0.7	515.00	360.50

Date	Professional	Narrative	Hours	Rate	Amount
6/29/2020	Laura Ho	Review documents and data re 216(b) strategy, correspondence w/ Outten and Golden re same	1.5	990.00	1485.00
6/29/2020	Laura Ho	Strategy w/ B. Holtzman re 216(b) filing	1.0	990.00	990.00
6/29/2020	Beth Holtzman	Confer with L. Ho re strategy for 216(b) motion re different types of draws and data	1.0	515.00	515.00
6/29/2020	Laura Ho	Review additional witness interviews and correspondence w/ B. Holtzman re follow up	0.8	990.00	792.00
6/29/2020	Beth Holtzman	Draft consent to join for former appraiser	0.2	515.00	103.00
6/29/2020	Jacqueline Thompson	Phone calls to witness, left message (.3) phone interview w/ [REDACTED] (.3); phone interview w/ [REDACTED] (.3); phone interview w/ [REDACTED] (.4)	1.3	365.00	474.50
6/30/2020	Beth Holtzman	Working meeting with L. Ho, Molly Frandsen, Sally Abrahamson re strategy for 216(b) motions	0.7	515.00	360.50
6/30/2020	Laura Ho	Phone call w/ B. Holtzman and Seltz counsel re 216(b) motion coordination	0.7	990.00	693.00
6/30/2020	Beth Holtzman	Review tolling agreements for Seltz and Dixon cases	0.2	515.00	103.00
6/30/2020	Beth Holtzman	Draft declarations for opt-in	3.5	515.00	1802.50
6/30/2020	Beth Holtzman	Review S. Grimes' analysis of data produced by Defendants	0.3	515.00	154.50
6/30/2020	Beth Holtzman	Review interview notes with potential opt-in	0.4	515.00	206.00
6/30/2020	Beth Holtzman	Draft 216(b) motion	0.4	515.00	206.00
6/30/2020	Laura Ho	Strategy w/ B. Holtzman re [REDACTED]	0.4	990.00	396.00
6/30/2020	Jacqueline Thompson	Exchange correspondence w/ Beth Holtzman re calls to witness (.5); phone calls to witness (1.0); update chart re phone calls (.4); phone interview w/ [REDACTED] (.9)	2.8	365.00	1022.00
7/1/2020	Beth Holtzman	Draft 216(b) motion	5.2	515.00	2678.00
7/1/2020	Beth Holtzman	Working meeting with S. Grimes re analysis of data	0.3	515.00	154.50
7/1/2020	Beth Holtzman	Working meeting with L. Ho and S. Grimes re analyzing data for conditional certification	0.6	515.00	309.00
7/1/2020	Beth Holtzman	Confer with L. Ho re strategy for opt-in declarations	0.6	515.00	309.00
7/1/2020	Beth Holtzman	Review correspondence from opposing counsel (Sadina Montani) re unmasking data for plaintiffs and opt-ins	0.1	515.00	51.50
7/1/2020	Beth Holtzman	Draft declaration for opt-ins	4.2	515.00	2163.00
7/1/2020	Stuart Kirkpatrick	Export OCR pdf of a Defendant's production document from Summation, for Beth Holtzman	0.2	350.00	70.00
7/1/2020	Laura Ho	Review draft opt in declarations and Conference w/ B. Holtzman re revisions	0.6	990.00	594.00
7/1/2020	Laura Ho	Strategy w/ S. Grimes and B. Holtzman re data declaration	0.6	990.00	594.00
7/1/2020	Laura Ho	Review S. Montani memo re unredacted data and upcoming discovery responses	0.2	990.00	198.00
7/1/2020	Scott Grimes (stat)	Conference w/ Beth Holtzman re analysis of earnings data	0.3	390.00	117.00
7/1/2020	Scott Grimes (stat)	Conference w/ L. Ho and Beth Holtzman re analysis of earnings data	0.6	390.00	234.00
7/1/2020	Scott Grimes (stat)	Analyze earnings data	1.6	390.00	624.00
7/2/2020	Stuart Kirkpatrick	Run export set of oCR pdfs from Summation per Beth Holtzman request	0.2	350.00	70.00
7/2/2020	Beth Holtzman	Draft 216(b) motion (incorporate L. Ho edits)	1.3	515.00	669.50
7/2/2020	Beth Holtzman	Draft 216(b) motion (factual background)	1.8	515.00	927.00
7/2/2020	Laura Ho	Review and revise draft 216(b) motion and correspondence w/ B. Holtzman re edits and supporting evidence	3.2	990.00	3168.00
7/2/2020	Beth Holtzman	Draft 216(b) motion (argument section)	3.1	515.00	1596.50
7/2/2020	Beth Holtzman	Review documents and data produced by defendants	0.2	515.00	103.00
7/2/2020	Laura Ho	Correspondence w/ Seltz counsel re coordination of two 216(b) motions	0.3	990.00	297.00
7/3/2020	Beth Holtzman	Draft 216(b) motion (incorporate L. Ho edits)	0.2	515.00	103.00
7/5/2020	Beth Holtzman	Draft 216(b) motion	0.2	515.00	103.00
7/5/2020	Beth Holtzman	Draft class member declaration	0.4	515.00	206.00
7/5/2020	Beth Holtzman	Draft class notice	0.6	515.00	309.00
7/6/2020	Beth Holtzman	Review correspondence with L. Ho, Sally Abrahamson, Molly Frandsen re strategy for 216(b) motion	0.1	515.00	51.50
7/6/2020	Beth Holtzman	Review Seltz 216(b) motion	0.2	515.00	103.00
7/6/2020	Beth Holtzman	Conference call with L. Ho, Sally Abrahamson, Molly Frandsen re strategy for 216(b) motions	0.3	515.00	154.50
7/6/2020	Beth Holtzman	Draft class notice and consent to join form	0.9	515.00	463.50
7/6/2020	Beth Holtzman	Draft opt-in declarations	1.0	515.00	515.00

Date	Professional	Narrative	Hours	Rate	Amount
7/6/2020	Beth Holtzman	Draft 216(b) motion	0.9	515.00	463.50
7/6/2020	Beth Holtzman	Working meeting with L. Ho, S. Grimes, J. Thompson re division of tasks for 216(b) motion	0.6	515.00	309.00
7/6/2020	Beth Holtzman	Draft proposed order for conditonal certification motion	0.4	515.00	206.00
7/6/2020	Beth Holtzman	Draft plaintiff's administrative motion to file documents under seal	1.6	515.00	824.00
7/6/2020	Laura Ho	Phone call w/ Seltz counsel re 216(b) strategy	0.3	990.00	297.00
7/6/2020	Laura Ho	Edits to notice and consent to join, correspondence w/ B. Holtzman re same	0.4	990.00	396.00
7/6/2020	Laura Ho	Correspondence w/ S. Grimes re data analysis	0.3	990.00	297.00
7/6/2020	Laura Ho	Review and revise T. Simone draft declaration, correspondence w/ B. Holtzman re same	0.7	990.00	693.00
7/6/2020	Beth Holtzman	Review documents produced by defendants	0.8	515.00	412.00
7/6/2020	Scott Grimes (stat)	Conference w. L. Ho, Beth Holtzman, J. Thompson re motion for conditional certification	0.6	390.00	234.00
7/6/2020	Scott Grimes (stat)	Draft Grimes declaration in suppot of motion for conditional certification	2.9	390.00	1131.00
7/6/2020	Jacqueline Thompson	Review Jude Corley standing order re requirements to schedule hearing date (.3); Review rules re filing under seal (.7); review correspondence from L. Ho re meeting to discuss 216 (b) filing (.1) conference w/ L. Ho, Beth Holtzman and S. Grimes re 216 (b) motion filing (.3)	1.4	365.00	511.00
7/7/2020	Beth Holtzman	Review documents produced by defendant	0.8	515.00	412.00
7/7/2020	Beth Holtzman	Discuss and review declaration with opt-in (Teresa Simone)	0.4	515.00	206.00
7/7/2020	Beth Holtzman	Draft declaration for opt-in	1.2	515.00	618.00
7/7/2020	Beth Holtzman	Discuss declaration with opt-in (John Dickerson)	0.3	515.00	154.50
7/7/2020	Beth Holtzman	Draft opt-in declaration	1.7	515.00	875.50
7/7/2020	Beth Holtzman	Draft class notice	0.4	515.00	206.00
7/7/2020	Beth Holtzman	Draft 216(b) motion	2.5	515.00	1287.50
7/7/2020	Beth Holtzman	Confer with L. Ho re exemptions and strategy for declaration drafting	0.3	515.00	154.50
7/7/2020	Beth Holtzman	Draft administrative motion to seal	1.1	515.00	566.50
7/7/2020	Beth Holtzman	Review correspondence with L. Ho, Sally Abrahamson, Molly Frandsen and opposing counsel (Sadina Montani) re production of documents and privilege log	0.1	515.00	51.50
7/7/2020	Beth Holtzman	Working meeting with L. Ho, S. Grimes, S. Kirkpatrick, J. Thompson re division of tasks for filing 216(b) motion	0.6	515.00	309.00
7/7/2020	Beth Holtzman	Draft declaration of Jacqueline Thompson in support of motion for conditional certification	1.4	515.00	721.00
7/7/2020	Beth Holtzman	Review S. Grimes declaration in support of conditional certification motion	0.1	515.00	51.50
7/7/2020	Beth Holtzman	Draft proposed order granting plaintiff's motion for conditional certification	0.2	515.00	103.00
7/7/2020	Stuart Kirkpatrick	Export requested production documents from Summation for Beth Holtzman	0.5	350.00	175.00
7/7/2020	Stuart Kirkpatrick	Phone conference with L. Ho, Beth Holtzman, J. Thompson and S. Grimes re: preparation for 7/8 filing of conditional cert brief	0.6	350.00	210.00
7/7/2020	Stuart Kirkpatrick	Legal cite-check and edit conditional certification brief	3.2	350.00	1120.00
7/7/2020	Laura Ho	Work on 216(b) filing w/ team	6.0	990.00	5940.00
7/7/2020	Scott Grimes (stat)	Phone call w/ L. Ho, Beth Holtzman, J. Thompson and S. Kirkpatrick re motion for conditional certification	0.6	390.00	234.00
7/7/2020	Scott Grimes (stat)	Revise Grimes declaration in suport of motion for conditional certification	2.9	390.00	1131.00
7/7/2020	Scott Grimes (stat)	Phone calls w/ L. Ho re Grimes declaration in support of motion for conditional certification	0.7	390.00	273.00
7/7/2020	Jacqueline Thompson	Fact check 216 brief (6.5); organize exhibits re J. Thompson declaration (1.5); prepare list of supporting documtns re 216 (b) filing (.4); exchange correspondence w/ Beth Holtzman re list of documents filing (.1)	6.4	365.00	2336.00
7/8/2020	Beth Holtzman	Correspondence with L. Ho re status of opt-in declarations	0.1	515.00	51.50
7/8/2020	Beth Holtzman	Finalize opt-in declaration	0.7	515.00	360.50
7/8/2020	Stuart Kirkpatrick	Prepare and transmit DocuSign declaration to Teresa Simone	0.1	350.00	35.00
7/8/2020	Beth Holtzman	Correspondence with opt-ins (John Dickerson, Teresa Simone) regarding declaration	0.2	515.00	103.00
7/8/2020	Beth Holtzman	Review documents produced by defendants	0.7	515.00	360.50
7/8/2020	Beth Holtzman	Draft administrative motion to file documents under seal	1.3	515.00	669.50

Date	Professional	Narrative	Hours	Rate	Amount
7/8/2020	Beth Holtzman	Draft 216(b) motion	5.2	515.00	2678.00
7/8/2020	Beth Holtzman	Draft opt-in declaration (Heather Elliott)	0.7	515.00	360.50
7/8/2020	Beth Holtzman	Telephone call with opt-in John Dickerson re declaration	0.3	515.00	154.50
7/8/2020	Beth Holtzman	Telephone conference with opt-in Heather Elliott re declaration	0.4	515.00	206.00
7/8/2020	Beth Holtzman	Draft proposed order	0.6	515.00	309.00
7/8/2020	Laura Ho	Finalize 216(b) filing w/ team	7.0	990.00	6930.00
7/8/2020	Laura Ho	Correspondence w/ opposing counsel re document production	0.2	990.00	198.00
7/8/2020	Beth Holtzman	Review S. Grimes declaration	0.6	515.00	309.00
7/8/2020	Laura Ho	Correspondence w/ M. Frandsen re 216(b) strategy	0.2	990.00	198.00
7/8/2020	Beth Holtzman	Working meeting with L. Ho, S. Grimes, J. Thompson, and S. Kirkpatrick re division of tasks for filing 216(b) motion	0.3	515.00	154.50
7/8/2020	Beth Holtzman	Telephone call with opt-in (Teresa Simone) re declaration	0.1	515.00	51.50
7/8/2020	Beth Holtzman	Confer with J. Thompson re division of tasks for filing 216(b) motion	0.1	515.00	51.50
7/8/2020	Beth Holtzman	Draft declaration of J. Thompson	0.4	515.00	206.00
7/8/2020	Beth Holtzman	Draft declaration of J. Thompson	0.5	515.00	257.50
7/8/2020	Beth Holtzman	Review exhibits and documents in preparation for filing	0.9	515.00	463.50
7/8/2020	Beth Holtzman	Confer with J. Thompson and S. Kirkpatrick re division of tasks	0.2	515.00	103.00
7/8/2020	Stuart Kirkpatrick	Prepare and transmit revised Declarations to John Dickerson and Heather Elliott via DocuSign	0.3	350.00	105.00
7/8/2020	Stuart Kirkpatrick	Analyze and edit table of authorities with word processing	0.5	350.00	175.00
7/8/2020	Stuart Kirkpatrick	Edit J. Thompson declaration exhibits per Beth Holtzman instructions in preparation for efilng	0.7	350.00	245.00
7/8/2020	Stuart Kirkpatrick	Cite check Thompson declaration against exhibits to ensure correct pages and titles of documents	0.4	350.00	140.00
7/8/2020	Stuart Kirkpatrick	Conference with J. Thompson re: filing order and division of labor to complete efilng	0.2	350.00	70.00
7/8/2020	Stuart Kirkpatrick	Exchange correspondence with Beth Holtzman and J. Thompson and redact public version of brief in preparation for efilng	0.4	350.00	140.00
7/8/2020	Stuart Kirkpatrick	Efile redacted public version of brief, Thompson Declaration, Proposed Order, and Grimes declaration	0.3	350.00	105.00
7/8/2020	Scott Grimes (stat)	Revise Grimes declaration in support of conditional certification motion	2.9	390.00	1131.00
7/8/2020	Scott Grimes (stat)	Edit motion for conditional certification	0.3	390.00	117.00
7/8/2020	Jacqueline Thompson	Continue to fact brief, review and edit J. Thompson declaration, organize exhibits, finalize brief for filing, efile brief and supporting documents (12.5); review rules re redacting documents, draft email re same (.3); exchange correspondence re blocked emails (.9); review correspondence re administrative motion to seal , finalize documents (.5)	14.2	365.00	5183.00
7/9/2020	Beth Holtzman	Review correspondence with L. Ho and Sally Abrahamson re extending deadlines for 216(b) briefing	0.1	515.00	51.50
7/9/2020	Beth Holtzman	Review stipulation re extending 216(b) briefing deadlines	0.1	515.00	51.50
7/9/2020	Beth Holtzman	Review 216(b) brief materials re sending unredacted copies to opposing counsel (Sadina Montani, Thomas Petrides)	0.8	515.00	412.00
7/9/2020	Beth Holtzman	Review status of administrative motion to file documents under seal	0.2	515.00	103.00
7/9/2020	Beth Holtzman	Correspondence with S. Kirkpatrick and J. Thompson re division of tasks for sending 216(b) motion materials to Chambers, opposing counsel, and Seltz counsel	0.1	515.00	51.50
7/9/2020	Laura Ho	Correspondence w/ Seltz counsel re briefing schedule and tolling	0.2	990.00	198.00
7/9/2020	Laura Ho	Correspondence w/ opposing counsel re briefing schedule extension	0.2	990.00	198.00
7/9/2020	Laura Ho	Draft stipulation re briefing schedule and tolling, and correspondence w/ opposing counsel re same	0.7	990.00	693.00
7/9/2020	Stuart Kirkpatrick	Prepare and email Word versions of the two 7/8 proposed orders to chambers	0.3	350.00	105.00

Date	Professional	Narrative	Hours	Rate	Amount
7/9/2020	Jacqueline Thompson	Review filing (1.0); exchange correspondence w/ Beth Holtzman and S. Kirkpatrick re sharing filing w/ Seltz firm(.3); review rules and phone call to clerk re chamber copies (.1); retrieve Seltz filing re conditional certification (.2); exchange correspondence w/ Beth Holtzman re sending underrated version of documents filed under seal to counsel(.4) review correspondence from L. Ho re stipulation re briefing schedule (.3); update prolaw re revise briefing schedule (.2); exchange correspondence w/ S. Kirkpatrick re proposed order to court and chambers copies (.2); draft correspondence to Beth Holtzman re administrative motion re defendant response due (.2)	2.9	365.00	1058.50
7/10/2020	Beth Holtzman	Correspondence with S. Kirkpatrick re transmitting filing materials to Seltz counsel	0.1	515.00	51.50
7/10/2020	Beth Holtzman	Review stipulation re proposed scheduling order for briefing	0.1	515.00	51.50
7/10/2020	Beth Holtzman	Review correspondence from opposing counsel (Sadina Montani) re document production	0.1	515.00	51.50
7/10/2020	Stuart Kirkpatrick	Analyze and consolidate Conditional Certification filings with their individual exhibits, to organize Worksite files	0.9	350.00	315.00
7/10/2020	Stuart Kirkpatrick	Collect and transmit all Conditional Certification 7/8 filing documents and transmit to Seltz counsel per Beth Holtzman instructions	0.4	350.00	140.00
7/10/2020	Laura Ho	Finalize stipulation re 216(b) briefing schedule	0.2	990.00	198.00
7/10/2020	Jacqueline Thompson	Review and file stipulation (.4); exchange correspondence w/ S. Kirkpatrick re organizing declaration and exhibits (.5); review correspond re exchange copies of filing with Seltz counsel (.2)	1.1	365.00	401.50
7/13/2020	Jacqueline Thompson	Review correspondence from court re chamber copies (.1); review Order re briefing schedule, update prolaw re same (.1);	0.2	365.00	73.00
7/13/2020	Beth Holtzman	Review judge's order granting stipulation re scheduling	0.1	515.00	51.50
7/13/2020	Laura Ho	Correspondence w/ B. Holtzman re new discovery requests	0.2	990.00	198.00
7/13/2020	Beth Holtzman	Draft discovery requests for California claims	0.1	515.00	51.50
7/15/2020	Beth Holtzman	Review correspondence from Sally Abrahamson re status of document production	0.1	515.00	51.50
7/15/2020	Beth Holtzman	Left voicemail for plaintiff (Dimitri Dixon) re status of case	0.1	515.00	51.50
7/15/2020	Beth Holtzman	Draft discovery requests for California claims	2.1	515.00	1081.50
7/15/2020	Beth Holtzman	Telephone call with named plaintiff (Dimitri Dixon) re update on 216(b) motion	0.3	515.00	154.50
7/16/2020	Beth Holtzman	Analyze documents produced by defendants	0.4	515.00	206.00
7/16/2020	Jacqueline Thompson	Review correspondence re document production	0.9	365.00	328.50
7/17/2020	Beth Holtzman	Correspondence with Sally Abrahamson and Molly Frandsen re potential opt-in	0.1	515.00	51.50
7/20/2020	Beth Holtzman	Draft discovery requests for California claims	1.5	515.00	772.50
7/21/2020	Beth Holtzman	Review defendant's supplemental document production	0.1	515.00	51.50
7/21/2020	Jacqueline Thompson	Review correspondence re supplemental document production	0.7	365.00	255.50
7/22/2020	Beth Holtzman	Review Molly Frandsen memo on strategy for discovery	0.3	515.00	154.50
7/22/2020	Beth Holtzman	Working meeting with L. Ho, Molly Frandsen, Sally Abrahamson re discovery strategy and division of tasks	0.4	515.00	206.00
7/22/2020	Laura Ho	Correspondence w/ Seltz counsel re discovery meet and confer	0.2	990.00	198.00
7/22/2020	Laura Ho	Phone call w/ Seltz counsel re discovery strategy	0.3	990.00	297.00
7/22/2020	Beth Holtzman	Draft discovery requests for California claims	2.1	515.00	1081.50
7/22/2020	Beth Holtzman	Review documents produced by defendant	0.4	515.00	206.00
7/22/2020	Jacqueline Thompson	Review correspondence between S. Kirkpatrick and Beth Holtzman re downloading supplemental document production	0.4	365.00	146.00
7/22/2020	Stuart Kirkpatrick	Download production sets from opposing counsel, and import load files into Summation	0.5	350.00	175.00
7/22/2020	Laura Ho	Review and revise request for production of documents and interrogatories, correspondence w/ B. Holtzman re same	0.7	990.00	693.00
7/23/2020	Beth Holtzman	Draft discovery requests for California claims	1.2	515.00	618.00
7/23/2020	Laura Ho	Correspondence w/ B. Holtzman re revisions to request for production of documents and interrogatories	0.6	990.00	594.00
7/27/2020	Jacqueline Thompson	Review correspondence between attorneys re discovery (.1); Review correspondence re discovery request (.2) Review correspondence re POS changes (.2)	0.5	365.00	182.50
7/27/2020	Beth Holtzman	Draft discovery requests	0.2	515.00	103.00

Date	Professional	Narrative	Hours	Rate	Amount
7/27/2020	Stuart Kirkpatrick	Interview former C&W employee [REDACTED] re: recoverable draw and employment experience, and draft interview notes for B. Holtzman review	1.1	350.00	385.00
7/27/2020	Stuart Kirkpatrick	Draft Proof of Service and serve First Set of Interrogatories and Requests for Production on Defendant, for B. Holtzman	0.2	350.00	70.00
7/28/2020	Beth Holtzman	Draft discovery requests	0.2	515.00	103.00
7/28/2020	Beth Holtzman	Correspondence with Molly Frandsen re potential opt-in	0.1	515.00	51.50
7/28/2020	Beth Holtzman	Review interview script with former appraiser [REDACTED]	0.3	515.00	154.50
7/28/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re email delivery issue	0.1	515.00	51.50
7/28/2020	Beth Holtzman	Analyze potential opt-in [REDACTED] compensation data	0.4	515.00	206.00
7/28/2020	Beth Holtzman	Draft consent to join form	0.5	515.00	257.50
7/28/2020	Stuart Kirkpatrick	Reply to Beth Holtzman inquiry re: [REDACTED]'s cease and desist letter to C&W re: recoverable draw	0.1	350.00	35.00
7/28/2020	Stuart Kirkpatrick	Finalize and transmit Consent and Declaration to [REDACTED] via DocuSign	0.2	350.00	70.00
7/28/2020	Stuart Kirkpatrick	Edit Proof of Service and discovery document dates, and serve initial discovery requests to opposing counsel	0.2	350.00	70.00
7/28/2020	Laura Ho	Review interview notes re [REDACTED] and correspondence w/ B. Holtzman and S. Kirkpatrick re CTJ	0.6	990.00	594.00
7/28/2020	Jacqueline Thompson	Review correspondence re discovery (.2); review correspondence re service list re POS	0.3	365.00	109.50
7/29/2020	Beth Holtzman	Review correspondence with Sally Abrahamson re strategy for conditional certification	0.1	515.00	51.50
7/29/2020	Laura Ho	Correspondence w/ S. Abrahamson re 216(b) notice strategy	0.2	990.00	198.00
7/29/2020	Jacqueline Thompson	Review correspondence from S. A re 216b filing	0.1	365.00	36.50
7/30/2020	Beth Holtzman	Review defendants' proposed modifications to class notice	0.3	515.00	154.50
7/31/2020	Beth Holtzman	Correspondence with L. Ho re motion to seal	0.2	515.00	103.00
7/31/2020	Beth Holtzman	Research local rules on administrative motion to seal	0.4	515.00	206.00
7/31/2020	Beth Holtzman	Review Logan Pardell edits to class notice	0.1	515.00	51.50
7/31/2020	Laura Ho	Review and respond to Seltz counsel re Seltz notices issues	0.3	990.00	297.00
8/3/2020	Jacqueline Thompson	Review correspondence re notice process- Seltz case	0.1	365.00	36.50
8/3/2020	Laura Ho	Review and respond re Seltz 216(b) notice edits	0.3	990.00	297.00
8/6/2020	Laura Ho	Correspondence w/ S. Grimes re data for California	0.2	990.00	198.00
8/6/2020	Laura Ho	Revisions to SAC and draft memo to opposing counsel re stipulation	0.8	990.00	792.00
8/6/2020	Laura Ho	Strategy w/ Seltz counsel re 216(b) opposition response, including phone call w/ S. Abrahamson	2.0	990.00	1980.00
8/6/2020	Jacqueline Thompson	Review defendant's opposition (.3)	0.3	365.00	109.50
8/7/2020	Laura Ho	Correspondence w/ B. Holtzman re motion for leave to amend complaint	0.1	990.00	99.00
8/10/2020	Jacqueline Thompson	Review notes re notes re case management conference due (.1); Review briefing schedule re correspondence from L. Ho re amending complaint motion deadline (.3); review correspondence from L. Ho re emails from Sadina (.2)	0.6	365.00	219.00
8/10/2020	Beth Holtzman	Draft motion for leave to file amended complaint	2.9	515.00	1493.50
8/10/2020	Beth Holtzman	Analyze defendant's opposition to plaintiff's motion for conditional certification	0.4	515.00	206.00
8/10/2020	Beth Holtzman	Working meeting with L. Ho, Sally Abrahamson, Molly Frandsen re strategy for reply brief and amended complaint and division of tasks	0.4	515.00	206.00
8/10/2020	Laura Ho	Phone call w/ Seltz counsel re 216(b) reply and amending complaint strategy	0.4	990.00	396.00
8/10/2020	Laura Ho	Correspondence w/ J. Thompson re filing schedule for motion for leave to amend	0.2	990.00	198.00
8/10/2020	Laura Ho	Correspondence w/ opposing counsel re SAC	0.2	990.00	198.00
8/11/2020	Beth Holtzman	Draft motion for leave to file amended complaint	2.3	515.00	1184.50
8/11/2020	Beth Holtzman	Draft motion for leave to file second amended complaint (incorporate L. Ho edits)	3.1	515.00	1596.50
8/11/2020	Beth Holtzman	Draft case management conference statement	0.1	515.00	51.50
8/11/2020	Laura Ho	Review and revise motion for leave to amend and correspondence w/ Seltz counsel re same	1.6	990.00	1584.00
8/11/2020	Laura Ho	Correspondence w/ B. Holtzman re case management conference statement	0.1	990.00	99.00
8/11/2020	Beth Holtzman	Research whether Rule 15 or Rule 16 should apply	1.0	515.00	515.00

Date	Professional	Narrative	Hours	Rate	Amount
8/11/2020	Beth Holtzman	Draft motion for leave to file second amended complaint (Rule 16 section)	2.5	515.00	1287.50
8/11/2020	Jacqueline Thompson	Review correspondence re production	0.1	365.00	36.50
8/12/2020	Beth Holtzman	Draft motion for leave to file second amended complaint (incorporate L. Ho edits)	1.3	515.00	669.50
8/12/2020	Beth Holtzman	Draft proposed order granting plaintiff's motion for leave to file second amended complaint	0.4	515.00	206.00
8/12/2020	Beth Holtzman	Draft attorney declaration in support of plaintiff's motion for leave to file second amended complaint	1.5	515.00	772.50
8/12/2020	Beth Holtzman	Draft case management conference statement	1.1	515.00	566.50
8/12/2020	Beth Holtzman	Draft case management conference statement (incorporate L. Ho edits)	0.4	515.00	206.00
8/12/2020	Beth Holtzman	Draft motion for amendment of court's scheduling order and for leave to file a second amended complaint	1.2	515.00	618.00
8/12/2020	Stuart Kirkpatrick	Legal cite-check Motion to File Second Amended Complaint	1.4	350.00	490.00
8/12/2020	Laura Ho	Review and revise motion re amending case management schedule, correspondence w/ B. Holtzman re same	0.6	990.00	594.00
8/12/2020	Laura Ho	Additional edits to motion for leave to amend, correspondence w/ B. Holtzman re same	1.2	990.00	1188.00
8/13/2020	Beth Holtzman	Review opposing counsel (Sadina Montani) edits to Case management conference statement	0.1	515.00	51.50
8/13/2020	Beth Holtzman	Draft motion for amendment of court's scheduling order and for leave to file second amended complaint (incorporate J. Thompson and S. Kirkpatrick edits)	0.1	515.00	51.50
8/13/2020	Stuart Kirkpatrick	Transmit legal cite-check edits into new worksite version	0.2	350.00	70.00
8/13/2020	Beth Holtzman	Draft case management conference statement (incorporate opposing counsel Sadina Montani's edits)	0.3	515.00	154.50
8/13/2020	Beth Holtzman	Draft motion for amendment of court's scheduling order and for leave to file second amended complaint	2.3	515.00	1184.50
8/13/2020	Beth Holtzman	Draft proposed order granting plaintiff's motion for amendment to the court's scheduling order and for leave to file amended complaint	0.2	515.00	103.00
8/13/2020	Beth Holtzman	Prepare exhibits	0.4	515.00	206.00
8/13/2020	Jacqueline Thompson	Fact check motion re filing second amended complaint (.9); exchange correspondence w/ Beth Holtzman and S. Kirkpatrick re same (.2); exchange correspondence w/ S. Kirkpatrick re downloading document production (.2);	1.3	365.00	474.50
8/13/2020	Laura Ho	Review case management conference statement edits and correspondence w/ B. Holtzman re finalizing	0.2	990.00	198.00
8/13/2020	Laura Ho	Additional edits to motion for leave to amend complaint, finalize and file, correspondence w/ B. Holtzman re same	3.0	990.00	2970.00
8/14/2020	Beth Holtzman	Review conditional certification mailing proposals for Seltz	0.2	515.00	103.00
8/14/2020	Laura Ho	Correspondence w/ Seltz counsel re case management conference	0.2	990.00	198.00
8/14/2020	Beth Holtzman	Correspondence with Molly Frandsen re status of notice section of reply brief in support of plaintiff's motion for conditional certification	0.1	515.00	51.50
8/14/2020	Jacqueline Thompson	Review correspondence from attorneys re claims administrator bid	0.2	365.00	73.00
8/17/2020	Laura Ho	Review order continuing case management conference, hearings and correspondence w/ J. Thompson re briefing deadlines	0.1	990.00	99.00
8/17/2020	Laura Ho	Correspondence M. Frandsen and B. Holtzman re reply to 216(b) schedule	0.2	990.00	198.00
8/17/2020	Jacqueline Thompson	Exchange correspondence w/ D. Siarny re access to document production (.1); exchange correspondence w/ S. Kirkpatrick re same (.1); update calendar re case related deadlines (.2)	0.4	365.00	146.00
8/17/2020	Beth Holtzman	Analyze defendant's opposition to Plaintiff's motion for conditional certification	1.0	515.00	515.00
8/17/2020	Beth Holtzman	Review notice section of reply in support of motion for conditional certification	0.1	515.00	51.50
8/17/2020	Beth Holtzman	Research evidence issues raised in defendant's opposition to motion for conditional certification	2.7	515.00	1390.50
8/17/2020	Beth Holtzman	Draft Plaintiff's reply in support of motion for conditional certification and court-authorized notice	1.0	515.00	515.00
8/18/2020	Beth Holtzman	Draft Plaintiff's reply in support of motion for conditional certification and court-authorized notice	4.3	515.00	2214.50
8/18/2020	Beth Holtzman	Legal research on issue of whether opt-ins from different locations can support FLSA notice for company-wide policy	3.2	515.00	1648.00
8/18/2020	Beth Holtzman	Analyze documents re defendant's compensation policies	0.2	515.00	103.00
8/18/2020	Beth Holtzman	Draft named plaintiff declaration in support of conditional certification	1.1	515.00	566.50

Date	Professional	Narrative	Hours	Rate	Amount
8/18/2020	Beth Holtzman	Draft Plaintiff's reply in support of motion for conditional certification and court-authorized notice	0.2	515.00	103.00
8/18/2020	Stuart Kirkpatrick	Download Volume 11 production set from Defendant and import into Summation case project for Beth Holtzman	0.4	350.00	140.00
8/18/2020	Jacqueline Thompson	Review correspondence re production.	0.1	365.00	36.50
8/19/2020	Beth Holtzman	Draft Plaintiff's reply in support of motion for conditional certification and court-authorized notice	3.4	515.00	1751.00
8/19/2020	Beth Holtzman	Working meeting with L. Ho re strategy for reply brief re exemptions	0.6	515.00	309.00
8/19/2020	Beth Holtzman	Draft Plaintiff's reply in support of motion for conditional certification and court-authorized notice	2.3	515.00	1184.50
8/19/2020	Beth Holtzman	Analyze compensation data	0.2	515.00	103.00
8/19/2020	Laura Ho	Strategy w/ B. Holtzman re reply on 216(b)	0.7	990.00	693.00
8/20/2020	Beth Holtzman	Review documents produced by defendant	0.1	515.00	51.50
8/20/2020	Beth Holtzman	Draft declaration of plaintiff Dimitri Dixon	0.3	515.00	154.50
8/20/2020	Beth Holtzman	Draft plaintiff's reply in support of motion for conditional certification and court-authorized notice	4.6	515.00	2369.00
8/20/2020	Stuart Kirkpatrick	Export pdfs of Defendant production documents requested by Beth Holtzman	0.1	350.00	35.00
8/20/2020	Laura Ho	Review/revise and legal research re reply re 216(b)	1.7	990.00	1683.00
8/21/2020	Beth Holtzman	Draft paralegal declaration for reply brief in support of plaintiff's motion for conditional certification	0.5	515.00	257.50
8/21/2020	Beth Holtzman	Draft reply in support of motion for conditional certification and court-authorized notice (incorporate L. Ho edits)	1.4	515.00	721.00
8/21/2020	Beth Holtzman	Research whether appraisers compensation satisfies the fee-basis test for FLSA exemptions	2.5	515.00	1287.50
8/21/2020	Laura Ho	Legal research re 216(b) reply and correspondence w/ B. Holtzman re same	4.5	990.00	4455.00
8/21/2020	Beth Holtzman	Research 216(b) notice cases that grant conditional cert on the question of whether an establishment is a "retail or service establishment"	1.6	515.00	824.00
8/21/2020	Beth Holtzman	Draft reply brief	1.4	515.00	721.00
8/22/2020	Beth Holtzman	Draft reply brief	0.1	515.00	51.50
8/24/2020	Beth Holtzman	Draft Dixon declaration	0.5	515.00	257.50
8/24/2020	Beth Holtzman	Draft declaration in support of reply brief	0.7	515.00	360.50
8/24/2020	Beth Holtzman	Draft reply brief in support of motion for conditional certification	2.6	515.00	1339.00
8/24/2020	Beth Holtzman	Analyze documents produced by defendants	0.5	515.00	257.50
8/24/2020	Beth Holtzman	Draft administrative motion to file documents conditionally under seal	0.6	515.00	309.00
8/24/2020	Beth Holtzman	Review Seltz documents	0.2	515.00	103.00
8/24/2020	Jacqueline Thompson	Exchange correspondence w/ S. Kirkpatrick re production (.1); update case calendar (.2); exchange correspondence w/ Beth Holtzman re logistics for reply brief (.2)	0.5	365.00	182.50
8/24/2020	Laura Ho	Review and respond to S. Montani re discovery extension	0.2	990.00	198.00
8/24/2020	Laura Ho	Further review and revise reply 216(b) filing, correspondence w/ B. Holtzman re same	2.2	990.00	2178.00
8/25/2020	Jacqueline Thompson	Exchange correspondence w/ S. Kirkpatrick re production (.3); review correspondence from Beth Holtzman re administrative motion to file under seal and supporting documents, reply brief and supporting documents; Fact check reply brief re motion for conditional certification and supporting documents (5.0); Review and respond to correspondence from L. Ho re extension to discovery, updated prolaw (.1);	5.4	365.00	1971.00
8/25/2020	Beth Holtzman	Draft declaration of plaintiff Dimitri Dixon	0.7	515.00	360.50
8/25/2020	Beth Holtzman	Left voicemail for plaintiff (Dimitri Dixon)	0.1	515.00	51.50
8/25/2020	Beth Holtzman	Telephone call with named plaintiff (Dimitri Dixon) re declaration	0.5	515.00	257.50
8/25/2020	Beth Holtzman	Draft Jacqueline Thompson Reply Declaration in support of motion for conditional certification	0.5	515.00	257.50
8/25/2020	Beth Holtzman	Draft reply in support of plaintiff's motion for conditional certification	1.9	515.00	978.50
8/25/2020	Beth Holtzman	Review Reply Declaration of Scott Grimes in support of plaintiff's motion for conditional certification	0.7	515.00	360.50
8/25/2020	Beth Holtzman	Draft administrative motion to file documents under seal	0.6	515.00	309.00
8/25/2020	Laura Ho	Additional revisions to reply 216(b) filing and correspondence w/ B. Holtzman re same	1.5	990.00	1485.00
8/25/2020	Stuart Kirkpatrick	Legal cite-check Reply brief	2.6	350.00	910.00
8/25/2020	Stuart Kirkpatrick	Transmit Declaration to Dimitri Dixon for review and signature	0.1	350.00	35.00

Date	Professional	Narrative	Hours	Rate	Amount
8/26/2020	Beth Holtzman	Draft reply brief in support of motion for conditional certification (incorporate J. Thompson edits)	0.3	515.00	154.50
8/26/2020	Beth Holtzman	Draft administrative motion to file documents under seal	0.7	515.00	360.50
8/26/2020	Beth Holtzman	Review Grimes Declaration	0.2	515.00	103.00
8/26/2020	Stuart Kirkpatrick	Review and edit Table of Authorities	0.3	350.00	105.00
8/26/2020	Laura Ho	Final review of 216(b) filing, correspondence w/ team re same	3.0	990.00	2970.00
8/26/2020	Beth Holtzman	Draft reply in support of plaintiff's motion for conditional certification (incorporate L. Ho edits)	1.9	515.00	978.50
8/26/2020	Laura Ho	Phone call w/ S. Abrahamson re ESI	0.2	990.00	198.00
8/26/2020	Beth Holtzman	Research parent-subsidary joint employer FLSA cases	0.1	515.00	51.50
8/26/2020	Beth Holtzman	Draft J. Thompson declaration in support of plaintiff's motion for conditional certification	0.1	515.00	51.50
8/26/2020	Beth Holtzman	Review reply brief and determine which text to redact	0.5	515.00	257.50
8/26/2020	Beth Holtzman	Review exhibits	0.2	515.00	103.00
8/26/2020	Stuart Kirkpatrick	Efile Administrative Motion and Reply Brief with J. Thompson, and email Word version of Proposed Order to Judge Corley	0.9	350.00	315.00
8/26/2020	Beth Holtzman	Review reply brief, declarations, and exhibits in preparation for filing	0.3	515.00	154.50
8/26/2020	Jacqueline Thompson	Review and respond to correspondence re administrative brief and supporting documents and reply brief and supporting documents, finalize reply brief re motion for conditional certification and supporting documents, efile administrative motion and supporting documents, efile reply brief and supporting documents	3.5	365.00	1277.50
8/27/2020	Beth Holtzman	Review Seltz website and notice documents	0.1	515.00	51.50
8/27/2020	Stuart Kirkpatrick	Confirm Courtcall billing deferred to October hearing date, for J. Thompson	0.2	350.00	70.00
8/27/2020	Beth Holtzman	Review defendant's opposition to motion to amend	0.5	515.00	257.50
8/27/2020	Beth Holtzman	Review and analyze defendant's opposition to motion to amend	1.0	515.00	515.00
8/27/2020	Beth Holtzman	Draft outline of reply brief in support of motion to amend court's scheduling order and for leave to file a second amended complaint	1.5	515.00	772.50
8/27/2020	Jacqueline Thompson	Review and respond to correspondence from L. Ho re updating proalw re hearing (.1); Review correspondence re Seltz notice (.2);	0.3	365.00	109.50
8/28/2020	Beth Holtzman	Review and analyze defendant's opposition to motion to amend	0.4	515.00	206.00
8/28/2020	Beth Holtzman	Research whether motion for conditional certification needs to be refiled after motion to amend complaint	1.4	515.00	721.00
8/28/2020	Beth Holtzman	Review defendant's responses to requests for production of documents	0.2	515.00	103.00
8/28/2020	Beth Holtzman	Correspondence with opposing counsel (Sadina Montani) re unredacted copies of motions	0.2	515.00	103.00
8/28/2020	Beth Holtzman	Analyze cases cited in defendant's opposition to plaintiff's motion to amend the court's scheduling order and for leave to file a second amended complaint	1.0	515.00	515.00
8/30/2020	Beth Holtzman	Telephonic conference with L. Ho re strategy for reply in support of motion to amend the court's scheduling order and for leave to file a second amended complaint	0.7	515.00	360.50
8/30/2020	Laura Ho	Review opposition to motion to amend and strategy w/ B. Holtzman re reply	2.5	990.00	2475.00
8/31/2020	Beth Holtzman	Draft reply brief in support of motion to amend court's scheduling order and for leave to file a second amended complaint	3.7	515.00	1905.50
8/31/2020	Beth Holtzman	Draft reply brief in support of motion to amend court's scheduling order and for leave to file a second amended complaint	0.3	515.00	154.50
9/1/2020	Beth Holtzman	Draft reply brief in support of motion to amend court's scheduling order and for leave to file a second amended complaint	2.0	515.00	1030.00
9/1/2020	Beth Holtzman	Draft reply brief in support of motion to amend court's scheduling order and for leave to file a second amended complaint	5.1	515.00	2626.50
9/1/2020	Jacqueline Thompson	Exchange correspondence w/ Beth Holtzman re reply brief	0.1	365.00	36.50
9/2/2020	Beth Holtzman	Draft plaintiff's reply in support of motion to amend court's scheduling order and for leave to file a second amended complaint (incorporate L. Ho edits)	3.3	515.00	1699.50
9/2/2020	Beth Holtzman	Draft attorney declaration in support of plaintiff's reply in support of motion to amend court's scheduling order and for leave to file a second amended complaint	0.7	515.00	360.50
9/2/2020	Beth Holtzman	Analyze compensation data	0.3	515.00	154.50
9/2/2020	Beth Holtzman	Telephonic conference with L. Ho re strategy for data analysis	0.1	515.00	51.50
9/2/2020	Laura Ho	Multiple revisions to reply re amending complaint, strategy w/ B. Holtzman re same	3.2	990.00	3168.00

Date	Professional	Narrative	Hours	Rate	Amount
9/2/2020	Beth Holtzman	Draft plaintiff's reply in support of motion to amend court's scheduling order and for leave to file a second amended complaint (incorporate citations)	1.0	515.00	515.00
9/2/2020	Beth Holtzman	Draft administrative motion to file documents under seal	0.3	515.00	154.50
9/2/2020	Beth Holtzman	Draft plaintiff's reply in support of motion to amend court's scheduling order and for leave to file a second amended complaint (incorporate L. Ho edits)	0.2	515.00	103.00
9/2/2020	Jacqueline Thompson	Fact check reply brief (3.0); exchange correspondence w/ Beth Holtzman and S. Kirkpatrick re cite checking reply brief (.2)	3.2	365.00	1168.00
9/3/2020	Beth Holtzman	Draft Scott Grimes Declaration in support of plaintiff's reply in support of motion to amend court's scheduling order and for leave to file a second amended complaint	0.5	515.00	257.50
9/3/2020	Stuart Kirkpatrick	Legal cite check and edit Reply Brief	1.4	350.00	490.00
9/3/2020	Beth Holtzman	Draft administrative motion to file documents under seal	0.8	515.00	412.00
9/3/2020	Beth Holtzman	Review documents produced by defendants	0.2	515.00	103.00
9/3/2020	Beth Holtzman	Draft reply in support of plaintiff's motion to amend the court's scheduling order and for leave to file a second amended complaint (incorporate J. Thompson edits)	0.2	515.00	103.00
9/3/2020	Beth Holtzman	Draft reply in support of plaintiff's motion to amend the court's scheduling order and for leave to file a second amended complaint (incorporate Molly Frandsen edits)	0.3	515.00	154.50
9/3/2020	Beth Holtzman	Draft reply in support of plaintiff's motion to amend the court's scheduling order and for leave to file a second amended complaint	2.0	515.00	1030.00
9/3/2020	Beth Holtzman	Review exhibits	0.2	515.00	103.00
9/3/2020	Beth Holtzman	Telephonic conference with S. Kirkpatrick and J. Thompson re division of tasks for filing	0.2	515.00	103.00
9/3/2020	Stuart Kirkpatrick	Review and edit Table of Authorities in Reply Brief	0.1	350.00	35.00
9/3/2020	Stuart Kirkpatrick	Finalize redacted and unredacted pdfs of Grimes Declaration and Reply brief with cover page language, in preparation for efilng	0.2	350.00	70.00
9/3/2020	Stuart Kirkpatrick	Conference call with J. Thompson and B. Holtzman re: finalizing and efilng Administrative Motion	0.2	350.00	70.00
9/3/2020	Stuart Kirkpatrick	Efile Administrative Motion and Reply Brief, and email Word version chambers copy of Proposed Order to Judge Corley	0.5	350.00	175.00
9/3/2020	Laura Ho	Final review/edit of 216(b) reply filing	2.5	990.00	2475.00
9/3/2020	Jacqueline Thompson	Fact check reply brief and organize supporting documents(2.) Conference w/ B. Holtzman and S. Kirkpatrick re administrative motion (.2)	2.2	365.00	803.00
9/4/2020	Beth Holtzman	Correspondence with opposing counsel (Sadina Montani, Thomas Petrides) re unredacted copies of filings	0.1	515.00	51.50
9/4/2020	Beth Holtzman	Review mediation statement and term sheet	0.6	515.00	309.00
9/4/2020	Beth Holtzman	Working meeting with L. Ho and S. Grimes re analyzing damages analysis	0.7	515.00	360.50
9/4/2020	Laura Ho	Strategy w/B. Holtzman and S. Grimes re data for settlement demand	0.7	990.00	693.00
9/8/2020	Beth Holtzman	Telephonic conference with L. Ho, S. Grimes and Sally Abrahamson, Molly Frandsen, Logan Pardell re damages analysis	0.5	515.00	257.50
9/8/2020	Beth Holtzman	Review PAGA letters for damages analysis	0.4	515.00	206.00
9/8/2020	Beth Holtzman	Analyze statute of limitations for claims in Dixon	0.4	515.00	206.00
9/8/2020	Laura Ho	Phone call w/ Seltz counsel re damages model, ESI	0.5	990.00	495.00
9/8/2020	Laura Ho	Correspondence w/ B. Holtzman re information for damages model	0.3	990.00	297.00
9/8/2020	Beth Holtzman	Analyze custodians for production of documents	0.4	515.00	206.00
9/8/2020	Laura Ho	Correspondence w/ B. Holtzman re custodians for ESI	0.2	990.00	198.00
9/8/2020	Scott Grimes (stat)	Phone call w/ L. Ho, Beth Holtzman and Seltz counsel re Jr. Appraiser damages	0.5	390.00	195.00
9/8/2020	Scott Grimes (stat)	Emails / L. Ho re same	0.2	390.00	78.00
9/9/2020	Beth Holtzman	Review Defendants' second amended response to interrogatory 13	0.1	515.00	51.50
9/9/2020	Beth Holtzman	Review draft stipulation and proposed order to continue the hearing to September 24, 2020	0.1	515.00	51.50
9/9/2020	Beth Holtzman	Review defendant's responses to plaintiff's discovery requests	0.2	515.00	103.00
9/9/2020	Beth Holtzman	Confer with S. Kirkpatrick re documents produced by defendants	0.2	515.00	103.00
9/9/2020	Beth Holtzman	Review documents produced by defendant	0.7	515.00	360.50
9/9/2020	Laura Ho	Correspondence w/ opposing counsel re hearing date change	0.1	990.00	99.00
9/9/2020	Stuart Kirkpatrick	Download Production 12 and 13 folders, and import into Summation for Beth Holtzman	0.3	350.00	105.00

Date	Professional	Narrative	Hours	Rate	Amount
9/10/2020	Beth Holtzman	Review filed stipulation and proposed order re rescheduling hearing and case management conference	0.1	515.00	51.50
9/10/2020	Beth Holtzman	Telephonic conference with Logan Pardell re strategy for damages calculations	0.1	515.00	51.50
9/10/2020	Beth Holtzman	Correspondence with L. Ho re statute of limitations for California class members	0.3	515.00	154.50
9/11/2020	Beth Holtzman	Telephonic conference call with L. Ho re strategy for damages calculations	0.3	515.00	154.50
9/11/2020	Beth Holtzman	Correspondence with Molly Frandsen re division of tasks for discovery review	0.1	515.00	51.50
9/11/2020	Laura Ho	Correspondence w/ Seltz counsel re damages calculations	0.3	990.00	297.00
9/11/2020	Laura Ho	Phone call w/ B. Holtzman re data and discovery meet and confer	0.3	990.00	297.00
9/11/2020	Laura Ho	Correspondence w/ M. Frandsen re new data and discovery meet and confer	0.2	990.00	198.00
9/14/2020	Beth Holtzman	Review damages calculations	0.1	515.00	51.50
9/14/2020	Laura Ho	Review Juniors damages calculations and correspondence w/ co-counsel re revisions	0.4	990.00	396.00
9/15/2020	Beth Holtzman	Analyze discovery requests and documents produced by defendants	0.6	515.00	309.00
9/15/2020	Beth Holtzman	Conference call with Molly Frandsen re division of tasks for deficient discovery	0.1	515.00	51.50
9/15/2020	Jacqueline Thompson	Review correspondence re updating prolaw	0.1	365.00	36.50
9/16/2020	Beth Holtzman	Analyze defendants' responses to Dixon's discovery requests and draft discovery deficiency chart	0.6	515.00	309.00
9/16/2020	Beth Holtzman	Correspondence with Molly Frandsen, Logan Pardell, Dierdre Aaron re damages	0.3	515.00	154.50
9/16/2020	Beth Holtzman	Research PAGA damages	0.5	515.00	257.50
9/16/2020	Laura Ho	Review Seltz counsel memos re damages calculations and correspondence w/ S. Grimes and B Holtzman re same	0.2	990.00	198.00
9/17/2020	Beth Holtzman	Analyze damages for PAGA penalties	0.6	515.00	309.00
9/17/2020	Beth Holtzman	Working meeting with L. Ho and S. Grimes re analyzing damages calculations	0.9	515.00	463.50
9/17/2020	Laura Ho	Phone call w/ S. Grimes and B. Holtzman re damages calculations	0.9	990.00	891.00
9/17/2020	Laura Ho	Respond to Seltz counsel re Juniors damages calculations	0.2	990.00	198.00
9/17/2020	Laura Ho	Correspondence w/ Seltz counsel re PAGA calculations	0.2	990.00	198.00
9/17/2020	Beth Holtzman	Research fluctuating workweek damages calculations for commissions and bonuses	1.1	515.00	566.50
9/18/2020	Beth Holtzman	Analyze defendants' responses to Dixon discovery requests and draft discovery deficiency chart	1.3	515.00	669.50
9/21/2020	Beth Holtzman	Analyze defendants' responses to Dixon discovery requests and draft discovery deficiency chart	0.5	515.00	257.50
9/21/2020	Beth Holtzman	Analyze damages calculations	0.1	515.00	51.50
9/21/2020	Laura Ho	Correspondence w/ Seltz counsel re damages calculations	0.2	990.00	198.00
9/21/2020	Beth Holtzman	Research California commission exemption and application to Dixon appraisers	0.9	515.00	463.50
9/22/2020	Beth Holtzman	Research California commission exemption	3.2	515.00	1648.00
9/22/2020	Beth Holtzman	Draft memorandum on California commissions exemption and Dixon appraisers	0.7	515.00	360.50
9/23/2020	Beth Holtzman	Review correspondence with opposing counsel (Sadina Montani) re outstanding discovery requests	0.1	515.00	51.50
9/23/2020	Beth Holtzman	Draft memorandum on California commissions exemption and Dixon appraisers	3.6	515.00	1854.00
9/23/2020	Beth Holtzman	Review damages analysis	0.3	515.00	154.50
9/23/2020	Beth Holtzman	Draft memorandum on California commissions exemption and Dixon appraisers	0.7	515.00	360.50
9/23/2020	Laura Ho	Correspondence w/ S. Grimes re damages calculations	0.4	990.00	396.00
9/24/2020	Beth Holtzman	Working meeting with L. Ho, S. Grimes, Sally Abrahamson, Dierdre Aaron, Molly Frandsen, Logan Pardell, Paolo Miereles re damages analysis	1.1	515.00	566.50
9/24/2020	Beth Holtzman	Draft memorandum on CA commissions exemption	3.0	515.00	1545.00
9/24/2020	Beth Holtzman	Analyze damages calculations	0.2	515.00	103.00
9/24/2020	Laura Ho	Phone call w/ Seltz counsel re damages analysis	1.1	990.00	1089.00
9/24/2020	Beth Holtzman	Review correspondence from opposing counsel (Thomas Petrides) re case management conference statement	0.1	515.00	51.50
9/24/2020	Beth Holtzman	Draft memorandum on CA commissions exemption	0.3	515.00	154.50

Date	Professional	Narrative	Hours	Rate	Amount
9/24/2020	Laura Ho	Correspondence w/ co-counsel re S. Montani leaving and impact on settlement demand	0.2	990.00	198.00
9/25/2020	Beth Holtzman	Draft case management conference statement	0.8	515.00	412.00
9/25/2020	Beth Holtzman	Analyze documents produced by defendants' and draft discovery deficiency chart	0.2	515.00	103.00
9/25/2020	Beth Holtzman	Draft memorandum on CA commissions exemption	1.0	515.00	515.00
9/25/2020	Laura Ho	Review and revise case management conference statement and correspondence w/ B. Holtzman re edits	0.3	990.00	297.00
9/25/2020	Laura Ho	Correspondence w/ O&G re settlement demand strategy	0.4	990.00	396.00
9/25/2020	Laura Ho	Correspondence w/ D. Dixon re case update	0.2	990.00	198.00
9/28/2020	Beth Holtzman	Draft case management conference statement	0.1	515.00	51.50
9/28/2020	Laura Ho	Correspondence w/ B. Holtzman re case management conference draft	0.2	990.00	198.00
9/29/2020	Beth Holtzman	Draft memo on California commission exemption	0.3	515.00	154.50
9/29/2020	Laura Ho	Strategy w/ D. Aaron re responding re settlement demand	0.4	990.00	396.00
9/29/2020	Stuart Kirkpatrick	Draft email to WP requesting edit to Proof of Service template to reflect new opposing counsel	0.1	350.00	35.00
9/30/2020	Beth Holtzman	Draft case management conference statement (incorporate opposing counsel (Mindy Wong) edits)	0.2	515.00	103.00
9/30/2020	Beth Holtzman	Draft memo on California commission exemption	1.3	515.00	669.50
9/30/2020	Jacqueline Thompson	Review and respond to correspondence from B. Holtzman re e-filing case management conference; efile case management conference	0.3	365.00	109.50
10/1/2020	Beth Holtzman	Correspondence with Molly Frandsen re potential opt-in	0.4	515.00	206.00
10/1/2020	Stuart Kirkpatrick	Exchange emails with B. Holtzman and [REDACTED] to schedule interview re: work experiences	0.2	350.00	70.00
10/2/2020	Beth Holtzman	Review conditional certification and motion for leave to file amended complaint	0.1	515.00	51.50
10/2/2020	Laura Ho	Correspondence w/ J. Thompson re hearing preparation	0.1	990.00	99.00
10/2/2020	Jacqueline Thompson	Review and respond to correspondence from L. Ho re hearing preparation (.5); exchange correspondence w/ K. Moseley re same (.3)	0.8	365.00	292.00
10/5/2020	Beth Holtzman	Review correspondence from Molly Frandsen and opposing counsel (Thomas Petrides) re privilege log	0.1	515.00	51.50
10/5/2020	Jacqueline Thompson	Respond to correspondence from L. Ho re hearing preparation	0.2	365.00	73.00
10/6/2020	Beth Holtzman	Prepare microsoft teams for tomorrow's hearing	1.1	515.00	566.50
10/6/2020	Beth Holtzman	Review plaintiff's motion for conditional certification and motion for amendment to the court's scheduling order and for leave to file a second amended complaint in preparation of tomorrow's hearing	0.4	515.00	206.00
10/6/2020	Beth Holtzman	Review notes from interview with appraiser	0.3	515.00	154.50
10/6/2020	Beth Holtzman	Correspondence with appraiser re lawsuit	0.3	515.00	154.50
10/6/2020	Laura Ho	Correspondence w/ B. Holtzman re witness calls	0.1	990.00	99.00
10/6/2020	Laura Ho	Preparation for hearings and case management conference	0.1	990.00	99.00
10/6/2020	Stuart Kirkpatrick	Phone interview with [REDACTED] re: work experience and recoverable draw, and draft interview notes for B. Holtzman review	1.2	350.00	420.00
10/6/2020	Beth Holtzman	Correspondence with L. Ho re strategy for hearing	0.4	515.00	206.00
10/6/2020	Stuart Kirkpatrick	Exchange emails with B. Holtzman and add Outten Golden as Guest accounts to enable Teams chat functionality	0.3	350.00	105.00
10/6/2020	Beth Holtzman	Correspondence with Deirdre Aaron, Molly Frandsen re strategy for Dixon hearing	0.3	515.00	154.50
10/6/2020	Jacqueline Thompson	Review correspondence from L. Ho re hearing preparation	0.1	365.00	36.50
10/6/2020	Scott Grimes (stat)	Analyze damages calculations	1.2	390.00	468.00
10/7/2020	Beth Holtzman	Attend hearing on motion for certification and court-authorized notice and motion for leave for leave to file amended complaint	0.4	515.00	206.00
10/7/2020	Beth Holtzman	Telephonic conference with L. Ho re strategy for complaint	0.1	515.00	51.50
10/7/2020	Beth Holtzman	Draft complaint	3.0	515.00	1545.00
10/7/2020	Beth Holtzman	Review notes from interview with appraiser [REDACTED]	0.2	515.00	103.00
10/7/2020	Beth Holtzman	Telephonic conference with appraiser [REDACTED] re experience as appraiser	0.5	515.00	257.50
10/7/2020	Beth Holtzman	Working meeting with L. Ho, Molly Frandsen and Deirdre Aaron re strategy and division of tasks for FLSA complaint	0.6	515.00	309.00
10/7/2020	Beth Holtzman	Telephonic conference with L. Ho re strategy for complaint	0.1	515.00	51.50
10/7/2020	Beth Holtzman	Draft consent to join form	0.3	515.00	154.50
10/7/2020	Beth Holtzman	Telephonic conference with plaintiff (Dimitri Dixon) re update after hearing	0.1	515.00	51.50

Date	Professional	Narrative	Hours	Rate	Amount
10/7/2020	Beth Holtzman	Correspondence with plaintiff (Dimitri Dixon) re filing new complaint	0.1	515.00	51.50
10/7/2020	Jacqueline Thompson	Review correspondence between L. Ho and D. Valdez re filing complaint and supporting documents	0.4	365.00	146.00
10/7/2020	Damon Valdez	Prepare complaint, summons, civil cover sheet and consent to join form for filing and electronically file same and exchange emails with L. Ho and B.Holtzman re same	6.4	350.00	2240.00
10/7/2020	Scott Grimes (stat)	Memos w/ B. Holtzman and L. Ho re damages calculations	0.3	390.00	117.00
10/7/2020	Scott Grimes (stat)	Analyze damages calculations	2.9	390.00	1131.00
10/8/2020	Beth Holtzman	Draft administrative motion to relate cases under Local Rule 3-12	0.6	515.00	309.00
10/8/2020	Beth Holtzman	Left voicemail for opt-in (Teresa Simone) re filing consent to join	0.1	515.00	51.50
10/8/2020	Beth Holtzman	Telephonic conference with opt-in (Heather Elliott) re consent to join	0.1	515.00	51.50
10/8/2020	Beth Holtzman	Left voicemail for opt-in (John Dickerson) re consent to join	0.1	515.00	51.50
10/8/2020	Beth Holtzman	Draft consent to join forms for Dixon II	0.5	515.00	257.50
10/8/2020	Beth Holtzman	Correspondence with opt-in (John Dickerson) re consent to join	0.2	515.00	103.00
10/8/2020	Jacqueline Thompson	Exchange correspondence w/ D. Valdez re filing complaint	0.1	365.00	36.50
10/8/2020	Jacqueline Thompson	Review and respond to correspondence from L. Ho re preparing waiver of service, prepare waiver of service (1.0); exchange correspondence w/ S. Grimes re mailing out acknowledgement (.2); review correspondence re consent to join forms (.2);	1.4	365.00	511.00
10/8/2020	Damon Valdez	Prepare and transmit consents to join case to to three possible opt ins	0.6	350.00	210.00
10/8/2020	Scott Grimes (stat)	Prepare waiver of service of summons for service	0.4	390.00	156.00
10/8/2020	Scott Grimes (stat)	Calculate damages	1.1	390.00	429.00
10/9/2020	Beth Holtzman	Review Court's order on motion for leave to file amended complaint	0.2	515.00	103.00
10/9/2020	Laura Ho	Correspondence w/ D. Aaron re mediation strategy	0.1	990.00	99.00
10/12/2020	Laura Ho	Correspondence w/ D. Valdez re H. Elliott	0.1	990.00	99.00
10/12/2020	Laura Ho	Review and revise notice and correspondence w/ M. Wong re same	0.3	990.00	297.00
10/12/2020	Damon Valdez	Review email from H. Elliott regarding signed consent to join form and draft email to team regarding same	0.3	350.00	105.00
10/13/2020	Beth Holtzman	Review status of consent to join forms	0.1	515.00	51.50
10/13/2020	Laura Ho	Phone call w/ D. Aaron re mediation strategy	0.5	990.00	495.00
10/13/2020	Laura Ho	Correspondence w/ D. Valdez re filing consents to join	0.2	990.00	198.00
10/13/2020	Jacqueline Thompson	Review correspondence between L. Ho and D. Valdez re consent to join	0.2	365.00	73.00
10/13/2020	Damon Valdez	Prepare and file Elliott consent to join form and exchange emails with L. Ho regarding same	0.6	350.00	210.00
10/14/2020	Jacqueline Thompson	Review correspondence from D. Valdez re consent to join template	0.1	365.00	36.50
10/14/2020	Laura Ho	Correspondence w/ J. Thompson re waiver of service of summons	0.1	990.00	99.00
10/14/2020	Damon Valdez	Prepare, file and serve waiver of summons	0.5	350.00	175.00
10/15/2020	Beth Holtzman	Review correspondence from opposing counsel (Thomas Petrides) re scheduling mediation	0.1	515.00	51.50
10/15/2020	Laura Ho	Correspondence w/ Seltz counsel re mediation scheduling	0.2	990.00	198.00
10/15/2020	Jacqueline Thompson	Review correspondence from D. Valdez re filing waiver of summons	0.2	365.00	73.00
10/16/2020	Beth Holtzman	Review correspondence with opposing counsel (Thomas Petrides) re status of notice	0.1	515.00	51.50
10/16/2020	Laura Ho	Review and revise stipulation and attachments re 216(b) notice, correspondence w/ B. Holtzman re same	0.6	990.00	594.00
10/19/2020	Beth Holtzman	Review correspondence from mediator Steven Rottman	0.1	515.00	51.50
10/19/2020	Laura Ho	Correspondence w/ D. Valdez re filing CTJ	0.1	990.00	99.00
10/20/2020	Beth Holtzman	Review defendant (Cushman & Wakefield) edits to class notice	0.2	515.00	103.00
10/20/2020	Beth Holtzman	Draft stipulation for 216(b) notice	1.5	515.00	772.50
10/20/2020	Beth Holtzman	Draft joint status report re mediation	0.5	515.00	257.50
10/20/2020	Laura Ho	Phone call w/ D. Aaron re preparation for mediation call w/ opposing counsel	0.4	990.00	396.00
10/20/2020	Laura Ho	Phone call w/ opposing counsel and Seltz counsel re mediation preparation	0.6	990.00	594.00
10/20/2020	Laura Ho	Phone call w/ D. Aaron re stay stipulation and notices	0.2	990.00	198.00
10/20/2020	Laura Ho	Correspondence w/ D. Valdez re filing consent to magistrate	0.3	990.00	297.00
10/20/2020	Laura Ho	Review and revise stipulation re notice and status report, correspondence w/ B. Holtzman re same	0.6	990.00	594.00
10/20/2020	Laura Ho	Correspondence w/ opposing counsel re 216(b) notice and status conference to court	0.2	990.00	198.00

Date	Professional	Narrative	Hours	Rate	Amount
10/20/2020	Damon Valdez	Prepare file and serve consent to magistrate jurisdiction	0.5	350.00	175.00
10/20/2020	Jacqueline Thompson	Review correspondence re consenting to magistrate (.1); exchange correspondence w/ D. Valdez re updating case deadlines and filing consnet form (.4)	0.5	365.00	182.50
10/21/2020	Beth Holtzman	Draft joint stipulation and joint status report (incorporate opposing counsel's edits)	0.2	515.00	103.00
10/21/2020	Beth Holtzman	Review correspondence with third-party administrators re notice process	0.1	515.00	51.50
10/21/2020	Beth Holtzman	Finalize attachments for joint stipulation	0.2	515.00	103.00
10/21/2020	Scott Grimes (stat)	Calculate damages	1.9	390.00	741.00
10/22/2020	Beth Holtzman	Review court's order denying administrative motion to file documents under seal	0.1	515.00	51.50
10/22/2020	Beth Holtzman	Correspondence with L. Ho re court's order granting stipulation	0.1	515.00	51.50
10/22/2020	Beth Holtzman	Telephonic conference with opposing counsel (Mindy Wong) re clarification to administrative motion to seal	0.1	515.00	51.50
10/22/2020	Laura Ho	Review CPT quote and correspondence w/ Outten re same	0.2	990.00	198.00
10/22/2020	Laura Ho	Review court's order denying motion to seal and correspondence w/ B. Holtzman re Cushman motion	0.2	990.00	198.00
10/22/2020	Beth Holtzman	Review defendant's administrative motion to file documents under seal	0.1	515.00	51.50
10/22/2020	Jacqueline Thompson	Review order from court re granting notice of collective action	0.1	365.00	36.50
10/22/2020	Beth Holtzman	Review motion to stay proceedings pending mediation	0.1	515.00	51.50
10/23/2020	Laura Ho	Correspondence w/ CPT re notice mailing	0.2	990.00	198.00
10/23/2020	Laura Ho	Review and respond re motion stay pending mediation	0.3	990.00	297.00
10/23/2020	Jacqueline Thompson	Review breifing re filing documents under seal	0.2	365.00	73.00
10/26/2020	Beth Holtzman	Review correspondence from opposing counsel (Thomas Petrides) re Notice for nationwide collective	0.1	515.00	51.50
10/26/2020	Jacqueline Thompson	Review correspondence between L. Ho and defendants re notice	0.4	365.00	146.00
10/26/2020	Laura Ho	Correspondence w/ opposing counsel re 216(b) notice	0.2	990.00	198.00
10/27/2020	Beth Holtzman	Review order re defendants' administrative motion to file under seal	0.1	515.00	51.50
10/28/2020	Beth Holtzman	Review correspondence with opposing counsel re stipulation for nationwide class certification	0.1	515.00	51.50
10/28/2020	Beth Holtzman	Draft stipulation for nationwide notice	1.2	515.00	618.00
10/28/2020	Beth Holtzman	Draft class notice, reminder notice, and consent to join for nationwide collective	0.6	515.00	309.00
10/28/2020	Beth Holtzman	Draft stipulation re class notice	0.4	515.00	206.00
10/29/2020	Beth Holtzman	Review correspondence from opposing counsel (Mindy Wong) re Seltz proposed order	0.1	515.00	51.50
10/30/2020	Beth Holtzman	Draft stipulation	0.7	515.00	360.50
10/30/2020	Beth Holtzman	Correspondence with opposing counsel (Mindy Wong) re edits to Dixon notice	0.1	515.00	51.50
10/30/2020	Laura Ho	Correspondence w/ B. Holtzman re stipulation re notice and staying case	0.4	990.00	396.00
10/30/2020	Laura Ho	Review edits to notice and correspondence w/ B. Holtzman re same	0.3	990.00	297.00
11/2/2020	Jacqueline Thompson	Review joint stipulation and notice (.1); review correspondence between L. Ho and D. Aaron re Colorado settlement (.1)	0.2	365.00	73.00
11/2/2020	Beth Holtzman	Review correspondence from Deirdre Aaron re Bursey settlement	0.1	515.00	51.50
11/2/2020	Beth Holtzman	Review joint motion for stay of proceedings pending settlement in Bursey case	0.2	515.00	103.00
11/2/2020	Beth Holtzman	Review certificate of interested entities	0.1	515.00	51.50
11/2/2020	Beth Holtzman	Draft stipulation re notice order	0.2	515.00	103.00
11/2/2020	Beth Holtzman	Review order granting stipulation	0.1	515.00	51.50
11/3/2020	Stuart Kirkpatrick	Efile Joint Stipulation and Proposed Order Modifying Schedule, and email Word version of proposed order to chambers	0.3	350.00	105.00
11/3/2020	Jacqueline Thompson	Review correspondence re case deadlines	0.1	365.00	36.50
11/3/2020	Jacqueline Thompson	Review correspondence between B. Holtzman and M. Wong re stipulation (.1); review correspondence from B. Holtzman re filing stipulation (.1)	0.2	365.00	73.00
11/5/2020	Jacqueline Thompson	Review stipulations in Dixon I and Dixon II re updating case calendar (.2); exchange correspondence w/ D. Valdez re updates missing case related deadlines from calendar (.2);	0.4	365.00	146.00
11/5/2020	Beth Holtzman	Review notice	0.2	515.00	103.00
11/5/2020	Laura Ho	Correspondence w/ B. Holtzman re 216(b) notice	0.2	990.00	198.00

Date	Professional	Narrative	Hours	Rate	Amount
11/5/2020	Beth Holtzman	Correspondence with J. Thompson re Cushman notice	0.1	515.00	51.50
11/5/2020	Jacqueline Thompson	Review and respond to correspondence from B. Holtzman re case number for notice	0.3	365.00	109.50
11/6/2020	Laura Ho	Correspondence w/ B. Holtzman re 216(b) notice edits	0.2	990.00	198.00
11/6/2020	Beth Holtzman	Correspondence with CPT re notice	0.2	515.00	103.00
11/6/2020	Jacqueline Thompson	Review and respond to correspondence from B. Holtzman re case 800 # for notice	0.1	365.00	36.50
11/9/2020	Beth Holtzman	Review correspondence with co-counsel (Deirdre Aaron) re strategy for data	0.1	515.00	51.50
11/10/2020	Ginger Grimes	Conference with L. Ho re background on case	0.2	565.00	113.00
11/10/2020	Ginger Grimes	Conference with L. Ho, S. Grimes, and B. Holtzman re data produced in discovery	0.9	565.00	508.50
11/10/2020	Laura Ho	Phone call w/ S. Grimes, G. Grimes, B. Holtzman re data for mediation	0.9	990.00	891.00
11/10/2020	Beth Holtzman	Call with L. Ho, G. grimes, S. Grimes re strategy for mediation and questions about data	0.9	515.00	463.50
11/10/2020	Beth Holtzman	Prepare background documents for G. Grimes	0.3	515.00	154.50
11/10/2020	Ginger Grimes	Review background materials on case	1.0	565.00	565.00
11/10/2020	Beth Holtzman	Correspondence with G. Grimes re mediation	0.3	515.00	154.50
11/10/2020	Laura Ho	Correspondence w/ co-counsel re website	0.1	990.00	99.00
11/10/2020	Laura Ho	Draft memo to S. Grimes re salary thresholds	0.2	990.00	198.00
11/10/2020	Scott Grimes (stat)	Conference w/ L. Ho, B. Holtzman, G. Grimes re analysis of pay data for mediation	1.0	390.00	390.00
11/10/2020	Scott Grimes (stat)	Analyze payroll data re number of class members	1.1	390.00	429.00
11/10/2020	Beth Holtzman	Correspondence with G. Grimes re notice	0.1	515.00	51.50
11/11/2020	Beth Holtzman	Correspondence with G. Grimes re document production in Cushman	0.3	515.00	154.50
11/11/2020	Ginger Grimes	Review case background materials	0.6	565.00	339.00
11/11/2020	Beth Holtzman	Correspondence with co-counsel (Deirdre Aaron) re website for notice	0.1	515.00	51.50
11/11/2020	Beth Holtzman	Prepare case materials	0.7	515.00	360.50
11/12/2020	Beth Holtzman	Correspondence with co-counsel (Deirdre Aaron) re website for notice	0.1	515.00	51.50
11/12/2020	Ginger Grimes	Conference with B. Holtzman, L. Ho, S. Grimes, D. Aaron, and M. Frandsen re Dixon notice and data produced in discovery	0.5	565.00	282.50
11/12/2020	Beth Holtzman	Working meeting with G. Grimes, L. Ho, S. Grimes, and co-counsel (Molly Frandsen, Deirdre Aaron) re notice and data for mediation	0.5	515.00	257.50
11/12/2020	Beth Holtzman	Review correspondence with opposing counsel (Mindy Wong) re class list	0.1	515.00	51.50
11/12/2020	Beth Holtzman	Draft memo on status of discovery	0.6	515.00	309.00
11/12/2020	Beth Holtzman	Review correspondence re data questions for mediation	0.1	515.00	51.50
11/12/2020	Laura Ho	Working meeting w/ G. Grimes, B. Holtzman, S. Grimes and co-counsel (Molly Frandsen, Deirdre Aaron) re notice and data for mediation	0.5	990.00	495.00
11/12/2020	Scott Grimes (stat)	Working meeting w/ L. Ho, G. Grimes, B. Holtzman and co-counsel (Molly Frandsen, Deirdre Aaron) re notice and data for mediation	0.5	390.00	195.00
11/13/2020	Beth Holtzman	Review stipulations re modifying order re class list	0.3	515.00	154.50
11/13/2020	Laura Ho	Correspondence w/ B. Holtzman re stipulation edits	0.2	990.00	198.00
11/16/2020	Beth Holtzman	Review correspondence with opposing counsel (Mindy Wong) and CPT	0.1	515.00	51.50
11/17/2020	Beth Holtzman	Review documents for cushman notice website	0.8	515.00	412.00
11/17/2020	Beth Holtzman	Review correspondence with L. Ho and co-counsel (Dierdre Aaron) re data questions for mediation	0.1	515.00	51.50
11/17/2020	Beth Holtzman	Correspondence with L. Ho and S. Grimes re wage data	0.1	515.00	51.50
11/17/2020	Beth Holtzman	Correspondence with J. Thompson and S. Kirkpatrick re document production	0.1	515.00	51.50
11/17/2020	Beth Holtzman	Correspondence with co-counsel (Molly Frandsen) re documents produced by defendants	0.1	515.00	51.50
11/17/2020	Beth Holtzman	Draft exit memo	0.2	515.00	103.00
11/17/2020	Laura Ho	Correspondence w/ B. Holtzman re notice mailing and website	0.3	990.00	297.00
11/17/2020	Laura Ho	Correspondence w/ co-counsel re data questions	0.3	990.00	297.00
11/17/2020	Jacqueline Thompson	Review correspondence from B. Holtzman re downloading documents	0.1	365.00	36.50
11/19/2020	Beth Holtzman	Review correspondence with L. Ho and S. Grimes re data	0.1	515.00	51.50

Date	Professional	Narrative	Hours	Rate	Amount
11/19/2020	Laura Ho	Correspondence w S. Grimes re data analysis	0.3	990.00	297.00
11/20/2020	Beth Holtzman	Correspondence with CPT re notice documents	0.1	515.00	51.50
11/20/2020	Beth Holtzman	Correspondence with co-counsel re notice website	0.3	515.00	154.50
11/20/2020	Beth Holtzman	Review the notice and consent to join form	0.1	515.00	51.50
11/23/2020	Laura Ho	Correspondence w/ opposing counsel re notice mailing	0.2	990.00	198.00
11/24/2020	Laura Ho	Correspondence w/ co-counsel and opposing counsel re data questions	0.3	990.00	297.00
11/24/2020	Laura Ho	Correspondence w/ administrator and co-counsel re notice website and schedule	0.2	990.00	198.00
11/30/2020	Laura Ho	Correspondence w/ CPT and O&G re notice website	0.4	990.00	396.00
12/1/2020	Ginger Grimes	Review case website for functionality	0.7	565.00	395.50
12/1/2020	Ginger Grimes	Correspondence to M. Frandsen re Dixon class list	0.3	565.00	169.50
12/1/2020	Laura Ho	Review and revise case website, correspondence w/ G. Grimes re edits	0.8	990.00	792.00
12/1/2020	Ginger Grimes	Correspondence to L. Ho re inquiry from M. Frandsen about potential class member	0.2	565.00	113.00
12/1/2020	Ginger Grimes	Correspondence to M. Frandsen re edits to case website	0.1	565.00	56.50
12/1/2020	Jacqueline Thompson	Review correspondence re testing consent to join submitted	0.1	365.00	36.50
12/2/2020	Ginger Grimes	Review case website for edits	0.3	565.00	169.50
12/2/2020	Laura Ho	Correspondence w/ G. Grimes and co-counsel re notice website and mailing	0.3	990.00	297.00
12/2/2020	Ginger Grimes	Correspondence to J. McLaughlin re Dixon case website	0.1	565.00	56.50
12/2/2020	Jacqueline Thompson	Phone call w/ Dixon re notice mailing (.2), exchange correspondence w/ L. Ho re same (.1), review and respond to correspondence from L. Ho re updating case file re G. Grimes receiving case emails and prolaw notifications (.3),	0.6	365.00	219.00
12/3/2020	Stuart Kirkpatrick	Prepare C&W case project export files with load file and tag/field overlays, and transmit to DISCO for migration from Summation	3.4	350.00	1190.00
12/4/2020	Stuart Kirkpatrick	Update field and tag migration overlay chart and transmit to DISCO	0.2	350.00	70.00
12/7/2020	Ginger Grimes	Review correspondence about data in preparation for call with opposing counsel	0.1	565.00	56.50
12/7/2020	Ginger Grimes	Conference with opposing counsel re data and Colorado case	0.3	565.00	169.50
12/7/2020	Laura Ho	Correspondence w/ J. Thompson re voicemail script	0.2	990.00	198.00
12/7/2020	Laura Ho	Correspondence w/ co-counsel re D. Wilkes	0.2	990.00	198.00
12/7/2020	Laura Ho	Phone call w/ D. Aaron re meet and confer w/ opposing counsel preparation	0.1	990.00	99.00
12/7/2020	Laura Ho	Phone call w/ M. Wong and D. Aaron re data questions	0.2	990.00	198.00
12/8/2020	Ginger Grimes	Correspondence to L. Ho re potential Dixon II opt-in	0.1	565.00	56.50
12/8/2020	Jacqueline Thompson	Review executed consent to join; exchange correspondence w/ L. Ho re procedure for processing consent to join; review opt in form received from R. Taylor and G. Williams; exchange correspondence w/ L. Ho re filing consent to join received and further communications w/ opt in; prepare R. Taylor and G. Williams consent to join for filing with court	0.1	365.00	36.50
12/8/2020	Laura Ho	Correspondence w/ J. Thompson re filing CTJs, edit notices re same	0.3	990.00	297.00
12/8/2020	Laura Ho	Review and revise intake form for consent to join filers	0.3	990.00	297.00
12/8/2020	Laura Ho	Correspondence w/ M. Frandsen re D. Wilkes.	0.1	990.00	99.00
12/8/2020	Ginger Grimes	Review notice of appearance for filing	0.1	565.00	56.50
12/8/2020	Jacqueline Thompson	Review opt in form received from R. Taylor and G. Williams (.3); exchange correspondence w/ L. Ho re filing consent to join received and further communications w/ opt in (.2); notice material (.4); prepare and efile consent to join forms of R. Taylor and G. Williams (.8); prepare chart tracking consent to join forms (.4)	2.2	365.00	803.00
12/10/2020	Jacqueline Thompson	Respond to correspondence from G. Grimes re processing consent form (.5); prepare and file consent to join form for J. Darner (.4); update tracking chart re consent to join (.5)	1.4	365.00	511.00
12/11/2020	Stuart Kirkpatrick	Update 800 number for Cushman voicemail message and email routing, and test routing path	0.2	350.00	70.00
12/11/2020	Jacqueline Thompson	Prepare and file M. Swallow consent to join form (.6); exchange correspondence w/ L. Ho re filing consent to join (.2);	0.8	365.00	292.00
12/14/2020	Stuart Kirkpatrick	Email DISCO tech re: status update of Summation case project migration	0.1	350.00	35.00

Date	Professional	Narrative	Hours	Rate	Amount
12/14/2020	Jacqueline Thompson	Phone call w/ [REDACTED] re opt in (.2); draft correspondence to L. Ho and G. Grimes re follow up call w/ [REDACTED] (.1); Prepare and file consent to join submitted by D. Wilkes for filing w/ court (.8); update tracking chart	1.1	365.00	401.50
12/15/2020	Stuart Kirkpatrick	Analyze migration summary chart, tags, fields, and notes from DISCO tech to confirm completion of migration of Plaintiff production and unproduced documents from Summation case project	1.9	350.00	665.00
12/15/2020	Stuart Kirkpatrick	Migrate non "CW_" bates-stamped production documents from Summation to DISCO, running overlays to import all load file metadata and proprietary fields	1.4	350.00	490.00
12/15/2020	Jacqueline Thompson	Respond to correspondence from G. Grimes re phone call w/ [REDACTED] (.1)	0.1	365.00	36.50
12/16/2020	Ginger Grimes	Voicemail to potential class member [REDACTED] re inquiry about joining case	0.1	565.00	56.50
12/16/2020	Ginger Grimes	Correspondence to settlement administrator re potential class member	0.1	565.00	56.50
12/16/2020	Ginger Grimes	Voicemail to class member M. Swallow re opt-in form	0.1	565.00	56.50
12/16/2020	Ginger Grimes	Correspondence to M. Frandsen re class member opt-in forms	0.1	565.00	56.50
12/16/2020	Ginger Grimes	Correspondence with J. Thompson re opt-in forms received by settlement administrator	0.1	565.00	56.50
12/16/2020	Stuart Kirkpatrick	Exchange emails with Summation technician and run export set of Cushman production documents with opt load file, in preparation for completing migration to DISCO	0.3	350.00	105.00
12/16/2020	Jacqueline Thompson	Respond to G. Grimes request re retrieving opt in form for J. Becerra, P. Savage, T. Caffrey Martin, Travis Campbell and H. Symmes (.5); update tracking chart re consent to join filed (.4)	0.9	365.00	328.50
12/17/2020	Ginger Grimes	Correspondence to M. Swallow re opt-in form	0.1	565.00	56.50
12/17/2020	Ginger Grimes	Review filing re consents to join	0.2	565.00	113.00
12/17/2020	Ginger Grimes	Correspondence to L. Ho re process for contacting Dixon I opt-ins about Dixon II membership	0.2	565.00	113.00
12/17/2020	Laura Ho	Correspondence w/ G. Grimes re consent to join filings	0.1	990.00	99.00
12/17/2020	Laura Ho	Correspondence w/ J. Thompson re consent to join filings	0.1	990.00	99.00
12/17/2020	Laura Ho	Correspondence w/ M. Wong re updated data and questions	0.1	990.00	99.00
12/17/2020	Stuart Kirkpatrick	Write overlay files and migrate remaining defendant production files to DISCO	1.2	350.00	420.00
12/17/2020	Jacqueline Thompson	Exchange correspondence w/ G. Grimes re filing consent to join forms (.3); update tracking chart (.4); respond to G. Grimes request re tracking chart re opt in class members (.1); review correspondence between L. Ho and G. Grimes re opt in (.1); Prepare and file consent to join forms for J. Becerra, Tonya (Caffrey) Martin, Travis Michael Campbell, Holly L. Symmes P. Savage and Peter Melvin Savage (.8) ; update tracking chart re consent to join filed (.4)	2.1	365.00	766.50
12/18/2020	Ginger Grimes	Review weekly report from settlement administrator	0.1	565.00	56.50
12/18/2020	Jacqueline Thompson	Draft correspondence to G. Grimes re phone call w/ T. Powell (.1) ; respond to correspondence from S. Kirkpatrick re reviewing unredacted consent to join in preparation for phone calls to opt in (.4) ; prepare and file consent to join form for [REDACTED] (.3) ; update tracking chart (.1)	0.9	365.00	328.50
12/21/2020	Ginger Grimes	Correspondence to opt-in M. Swallow re consent to join	0.1	565.00	56.50
12/21/2020	Ginger Grimes	Voicemail to potential opt-in A. Bengford re question about opting into lawsuit	0.1	565.00	56.50
12/21/2020	Jacqueline Thompson	Update tracking chart re consent to join (.4); review correspondence from A Bengford (.1); review correspondence from G. Grimes re correspondence w/ M. Swallow (.1).	0.6	365.00	219.00
12/21/2020	Ginger Grimes	Conference with opt-in M. Swallow re dates worked	0.1	565.00	56.50
12/21/2020	Ginger Grimes	Correspondence to L. Ho and J. Thompson re updated opt-in spreadsheet	0.1	565.00	56.50
12/21/2020	Laura Ho	Correspondence w/co-counsel re data questions	0.1	990.00	99.00
12/22/2020	Ginger Grimes	Review correspondence from M. Frandsen re defendant's produced data	0.1	565.00	56.50
12/28/2020	Ginger Grimes	Review interview script and correspondence with J. Thompson re same	0.2	565.00	113.00
12/28/2020	Laura Ho	Correspondence w/ J. Thompson re filing CTJs	0.2	990.00	198.00
12/28/2020	Stuart Kirkpatrick	Interview Gene Williams re: work experience at C&W, and write up notes for attorney review	0.9	350.00	315.00

Date	Professional	Narrative	Hours	Rate	Amount
12/28/2020	Stuart Kirkpatrick	Interview Jeremy Darner re: work experience at C&W, and write up notes for attorney review	1.0	350.00	350.00
12/28/2020	Laura Ho	Correspondence w/ G. Grimes re opt ins and mediation	0.2	990.00	198.00
12/28/2020	Jacqueline Thompson	Update tracking chart re filed consent to join forms; draft correspondence to L. Ho re opt in interview process; exchange correspondence w/ S. Kirkpatrick re opt in interviews; review correspondence from G. Grimes re opt in interviews	0.1	365.00	36.50
12/29/2020	Ginger Grimes	Review interview notes with opt-in plaintiffs	0.2	565.00	113.00
12/29/2020	Ginger Grimes	Correspondence to S. Kirkpatrick re interviews with opt-ins	0.2	565.00	113.00
12/29/2020	Ginger Grimes	Conference with S. Kirkpatrick re inquiry from opt-in plaintiff	0.1	565.00	56.50
12/29/2020	Ginger Grimes	Conference with opt-in plaintiff J. Darner re questions about case	0.3	565.00	169.50
12/29/2020	Ginger Grimes	Correspondence with S. Kirkpatrick and L. Ho re summary of call with J. Darner	0.2	565.00	113.00
12/29/2020	Stuart Kirkpatrick	Analyze Consent to Join filings in Seltz case docket, and draft reply to G. Grimes inquiry re: filing date of consent to join for J. Darner	0.2	350.00	70.00
12/29/2020	Ginger Grimes	Review consent to join form for filing	0.1	565.00	56.50
12/29/2020	Jacqueline Thompson	Review correspondence re consent to join from cpt group; update tracking chart; preapre consent to join for filing w/ court; exchange correspondence w/ L. Ho re filing consent to join; review and respond to correspondence re J. Darner; exchanctge correspondence w/ S. Kirkpatrick re retrieving J. Darner consent to join in Seltz case; prepare Simone consent to join for filing w/ court	0.1	365.00	36.50
12/30/2020	Jacqueline Thompson	Review correspondence re Colorado settlement	0.1	365.00	36.50
12/30/2020	Ginger Grimes	Correspondence to S. Kirkpatrick re interviews with opt-ins	0.1	565.00	56.50
12/30/2020	Stuart Kirkpatrick	Left voicemail for Michelle Swallow to schedule interview re: work experience at Cushman	0.1	350.00	35.00
12/30/2020	Stuart Kirkpatrick	Left voicemail for Jesus Becerra to schedule interview re: work experience at Cushman	0.1	350.00	35.00
12/30/2020	Stuart Kirkpatrick	Phone call with Peter Savage to schedule interview re: work experience at Cushman	0.1	350.00	35.00
12/30/2020	Stuart Kirkpatrick	Phone call with Gene Williams to explain sign-up form for Dixon II case, and email link to form	0.1	350.00	35.00
12/30/2020	Ginger Grimes	Voicemail to opt-in J. Darner re case inquiry	0.1	565.00	56.50
12/30/2020	Stuart Kirkpatrick	Interview Peter Savage re: work experience at C&W, and write up notes for attorney review	0.9	350.00	315.00
12/30/2020	Ginger Grimes	Conference with opt-in J. Darner re inquiry about case	0.1	565.00	56.50
12/31/2020	Ginger Grimes	Correspondence to J. Thompson re submission of consent to join form	0.1	565.00	56.50
1/4/2021	Ginger Grimes	Review documents re opt-in G. Williams	0.1	565.00	56.50
1/4/2021	Stuart Kirkpatrick	Interview Jesus Becerra re: work experience at C&W, and write up notes for attorney review	0.8	350.00	280.00
1/4/2021	Ginger Grimes	Review interview notes with opt-in plaintiff J. Becerra	0.1	565.00	56.50
1/4/2021	Ginger Grimes	Review opt-in form for filing	0.1	565.00	56.50
1/4/2021	Jacqueline Thompson	Review witness interview form (.2); prepare for calling opt in (.2); prepare and file consent to join from Jesus Becerra for filing (.4); exchange correspondence w/attorneys re filing consent to join (.1);	0.9	365.00	328.50
1/5/2021	Jacqueline Thompson	Phone interview and draft notes re Tonya Caffrey Martin (.6); phone interview and draft notes re David Wikes (.9) update tracking chart (.3)	1.8	365.00	657.00
1/7/2021	Jacqueline Thompson	Phone interview w/ R. Taylor	0.4	365.00	146.00
1/12/2021	Jacqueline Thompson	Prepare K. Beigle consent to joins for filing in both cases (.6); update tracking chart (.4)	1.0	365.00	365.00
1/13/2021	Ginger Grimes	Voicemail to opt-in K. Beigle re consent to join form	0.1	565.00	56.50
1/13/2021	Ginger Grimes	Conference with opt-in K. Beigle re opt-in form	0.1	565.00	56.50
1/13/2021	Stuart Kirkpatrick	Review Michelle Swallow consent to join status and draft email to G. Grimes re: request to be removed from case	0.2	350.00	70.00
1/13/2021	Jacqueline Thompson	Review correspondence from G. Grimes re contacting K. Beigle (.1); revise Beigle consent to join for filing w/ court (.3); review correspondence between G. Grimes and S. Kirkpatrick re M. Swallow (.2)	0.6	365.00	219.00
1/14/2021	Jacqueline Thompson	Prepare Beigle consent to join for filing w/ court; respond to request from G. Grimes re list of class embers who opted into Dixon I; respond to G. Grimes re opt in Dixon II case	0.1	365.00	36.50
1/14/2021	Ginger Grimes	Review and revise reminder notice	0.1	565.00	56.50
1/14/2021	Ginger Grimes	Correspondence to J. Thompson re list of opt-ins	0.2	565.00	113.00

Date	Professional	Narrative	Hours	Rate	Amount
1/14/2021	Laura Ho	Correspondence w/ G. Grimes re reminder mailing	0.2	990.00	198.00
1/14/2021	Ginger Grimes	Correspondence to settlement administrator re consent to join forms received	0.1	565.00	56.50
1/15/2021	Ginger Grimes	Correspondence to L. Ho re consent to join forms submitted	0.2	565.00	113.00
1/15/2021	Jacqueline Thompson	Review case files responding to request from G. Grimes re J. Dickerson and C. Wilson interviews	0.4	365.00	146.00
1/22/2021	Stuart Kirkpatrick	Draft reply email to [REDACTED] re: question about Consent to Join form	0.1	350.00	35.00
1/22/2021	Stuart Kirkpatrick	Leave voicemail for K. McCormack re: question about participating in lawsuit	0.1	350.00	35.00
1/25/2021	Jacqueline Thompson	Review correspondence from L. Ho re consent to join received forms	0.5	365.00	182.50
1/26/2021	Ginger Grimes	Correspondence to J. Thompson re updating consent to join tracking spreadsheet	0.1	565.00	56.50
1/26/2021	Ginger Grimes	Conference with D. Aaron, M. Frandsen, and L. Ho re preparation for mediation	0.2	565.00	113.00
1/26/2021	Laura Ho	Phone call w/ co-counsel re mediation planning	0.3	990.00	297.00
1/26/2021	Jacqueline Thompson	Prepare consent to join forms for G. Williams and M. Edlund; update tracking chat (.9); review previously filed consent to join (.5); exchange correspondence w/ G. Grimes re filing consent to join w/ court (.2)	1.6	365.00	584.00
1/27/2021	Jacqueline Thompson	Update tracking chart	0.4	365.00	146.00
1/28/2021	Jacqueline Thompson	Respond to correspondence from G. Grimes re edits to calendar	0.2	365.00	73.00
2/1/2021	Ginger Grimes	Review consent to join forms for filing	0.1	565.00	56.50
2/1/2021	Laura Ho	Correspondence w/ J. Thompson re consent to join filings	0.2	990.00	198.00
2/1/2021	Jacqueline Thompson	Review and prepare consent to join forms for K. McCormack, efile consent to join forms w/ court (.8); update tracking chart (.3); exchange correspondence w/ L. Ho re K. McCormack consent to join forms filing (.2)	1.3	365.00	474.50
2/2/2021	Jacqueline Thompson	Respond to G. Grimes re updating tracking chart	0.5	365.00	182.50
2/4/2021	Ginger Grimes	Conference with Dixon and Seltz legal teams re preparing for mediation	0.5	565.00	282.50
2/4/2021	Laura Ho	Phone call w/ co-counsel re data issues	0.5	990.00	495.00
2/4/2021	Laura Ho	Phone call w/ S. Grimes re data and damages calculations	0.4	990.00	396.00
2/4/2021	Ginger Grimes	Review memo on damages estimate from past mediation	0.5	565.00	282.50
2/4/2021	Ginger Grimes	Review opt-in form for filing	0.1	565.00	56.50
2/4/2021	Jacqueline Thompson	Review correspondence from L. Ho re preparing consent to join for [REDACTED]	0.6	365.00	219.00
2/4/2021	Scott Grimes (stat)	Conference w/ L. Ho re class list and damages	0.4	390.00	156.00
2/4/2021	Scott Grimes (stat)	Calculate damages	2.3	390.00	897.00
2/5/2021	Jacqueline Thompson	Exchange correspondence w/ G. Grimes re filing consent to join	0.2	365.00	73.00
2/9/2021	Ginger Grimes	Voicemail to potential opt-in re inquiry	0.1	565.00	56.50
2/9/2021	Ginger Grimes	Conference with potential opt-in A. Bengford re settlement check in Colorado case	0.1	565.00	56.50
2/9/2021	Ginger Grimes	Correspondence to J. Thompson re question about consent to join form	0.1	565.00	56.50
2/9/2021	Jacqueline Thompson	Review consent to join and tracking chart re M. Edlund consent to join (.3); draft correspondenc w/ G. Grimes re M. Edlund duplicate and new consent to join form (.1);	0.4	365.00	146.00
2/10/2021	Ginger Grimes	Conference with L. Ho re potential opt-in inquiry	0.1	565.00	56.50
2/10/2021	Stuart Kirkpatrick	Review case website form and interview template, and return call to [REDACTED] re: questions about case	0.2	350.00	70.00
2/10/2021	Jacqueline Thompson	Review correspondence between G. Grimes and A. Bengford (.2); draft correspondence re phone call w/ [REDACTED] re consent to join form (.3); draft correspondence re phone call w/ M. Edlund (.2); respond to correspondence from L. Ho re return [REDACTED] phone call (.1)	0.8	365.00	292.00
2/11/2021	Laura Ho	Correspondence w/ S. Kirkpatrick re [REDACTED] phone call	0.2	990.00	198.00
2/11/2021	Ginger Grimes	Voicemail for A. Bengford re inquiry about lawsuit	0.1	565.00	56.50
2/11/2021	Ginger Grimes	Conference with potential class member [REDACTED] re inquiry about lawsuit	0.2	565.00	113.00
2/11/2021	Ginger Grimes	Correspondence to L. Ho, S. Kirkpatrick, and J. Thompson re inquiry from class member	0.1	565.00	56.50
2/11/2021	Stuart Kirkpatrick	Phone call with [REDACTED] re: case questions, and draft email to case attorneys re: request for attorney consultation	0.2	350.00	70.00

Date	Professional	Narrative	Hours	Rate	Amount
2/11/2021	Stuart Kirkpatrick	Phone interview with [REDACTED] re: appraiser work experience at C&W, and draft interview notes for attorney review	0.7	350.00	245.00
2/12/2021	Jacqueline Thompson	REview correspondence from S. Kirkpatrick re phoen call w/ [REDACTED]	0.1	365.00	36.50
2/18/2021	Jacqueline Thompson	Updated consent to join tracking chart (.6); review and prepare consent to join from Pike for filing w/ court (.4).	1.0	365.00	365.00
2/18/2021	Ginger Grimes	Review consent to join form for filing	0.1	565.00	56.50
2/18/2021	Laura Ho	Correspondence w/ S. Grimes re data and pay issues	0.3	990.00	297.00
2/18/2021	Scott Grimes (stat)	Analyze payroll and employment data re damages	3.2	390.00	1248.00
2/18/2021	Scott Grimes (stat)	Memo to team re inconsistencies in pay and employemnt data	0.4	390.00	156.00
2/19/2021	Laura Ho	Correspondence w/ S. Grimes re data issues	0.4	990.00	396.00
2/19/2021	Laura Ho	Correspondence w/ D. Dixon re mediation schedule	0.2	990.00	198.00
2/19/2021	Scott Grimes (stat)	Analyze compensaion data damages	5.9	390.00	2301.00
2/19/2021	Scott Grimes (stat)	Memos to team re issues wth compensation data	0.4	390.00	156.00
2/22/2021	Ginger Grimes	Conference with L. Ho, S. Grimes, M. Frandsen, L. Pardell, D. Aaron re mediation strategy and damages analysis	0.5	565.00	282.50
2/22/2021	Laura Ho	Team call re data issues	0.5	990.00	495.00
2/22/2021	Laura Ho	Review and revise mediation statement and correspondence w/ co-counsel re edits	1.7	990.00	1683.00
2/22/2021	Ginger Grimes	Review draft mediation brief	0.3	565.00	169.50
2/22/2021	Jacqueline Thompson	Review correspondence from S. Grimes re class list and junior appraisals	0.1	365.00	36.50
2/22/2021	Scott Grimes (stat)	Conference w/ L. Ho, G. Grimes, M. Fransen re Pardell damages	0.7	390.00	273.00
2/22/2021	Scott Grimes (stat)	Analyze pay and employment data re damages	2.6	390.00	1014.00
2/23/2021	Ginger Grimes	Correspondence to L. Ho and M. Frandsen re workweek value of Colorado settlement	0.1	565.00	56.50
2/23/2021	Laura Ho	Correspondence w/ opposing counsel re premediation approach	0.2	990.00	198.00
2/23/2021	Laura Ho	Phone call w/ S. Grimes re data issues	0.5	990.00	495.00
2/23/2021	Jacqueline Thompson	Prepare consent to join for filing w/ court M. Tidwell (.3); update tracking chart (.1)	0.4	365.00	146.00
2/23/2021	Scott Grimes (stat)	Conference w/ L. Ho re data issues	0.5	390.00	195.00
2/23/2021	Scott Grimes (stat)	Calculate damages	5.9	390.00	2301.00
2/24/2021	Ginger Grimes	Correspondence to J. Thompson re consent to join form received through notice administrator	0.1	565.00	56.50
2/24/2021	Jacqueline Thompson	Prepare M. Tidwell consent to join for filing w/ court, phone call to M. Tidwell re filing consent to join, update re filing consent to join (.6); update tracking chart (.2); exchange correspondence w/ G. Grimes re M. Tidwell consent to join (.2)	1.0	365.00	365.00
2/24/2021	Scott Grimes (stat)	Calculate damages	4.9	390.00	1911.00
2/24/2021	Scott Grimes (stat)	Correspondence with L. Pardell re pay data issues	0.4	390.00	156.00
2/25/2021	Laura Ho	Conference w/ S. Grimes re data issues	0.9	990.00	891.00
2/25/2021	Laura Ho	Phone call w/ S. Grimes re data issues	0.7	990.00	693.00
2/25/2021	Laura Ho	Correspondence w/ M. Frandsen re mediation brief and data issues	0.3	990.00	297.00
2/25/2021	Jacqueline Thompson	Review correspondence from G. Grimes re M. Tidwell consent to join	0.2	365.00	73.00
2/25/2021	Scott Grimes (stat)	Conferences w/ L. Ho re data issues	1.6	390.00	624.00
2/25/2021	Scott Grimes (stat)	Calculate damages	5.9	390.00	2301.00
2/26/2021	Ginger Grimes	Review revised mediation statement	0.1	565.00	56.50
2/26/2021	Ginger Grimes	Conference with L. Ho, S. Grimes, M. Frandsen, D. Aaron, L. Pardell re preparing for call with opposing counsel re mediation scope, and data analysis for mediation	0.4	565.00	226.00
2/26/2021	Ginger Grimes	Correspondence to team re Dixon class lists	0.1	565.00	56.50
2/26/2021	Laura Ho	Phone call w/ co counsel re mediation preparation	0.4	990.00	396.00
2/26/2021	Laura Ho	Phone call w/ opposing counsel re mediation preparation	0.5	990.00	495.00
2/26/2021	Jacqueline Thompson	Review and prepare consent to join for A. Bengford (.7); exchange correspondence w/ G. Grimes re A. Bengford consent to join (.1)	0.8	365.00	292.00
2/26/2021	Jacqueline Thompson	Update consent to join tracking chart (.3); prepare A. Bengford consent to join (.3); correspondence to L. Ho and G. Grimes re same (.1); exchange correspondence w/ G. Grimes re A. Bengford consent to join (.1)	0.8	365.00	292.00
2/26/2021	Scott Grimes (stat)	Conference w/ L. Ho, G. Grimes, M. Frandsen, D. Aaron and L. Pardell re mediation preparation	0.5	390.00	195.00
2/26/2021	Scott Grimes (stat)	Calculate damages	3.3	390.00	1287.00

Date	Professional	Narrative	Hours	Rate	Amount
3/1/2021	Ginger Grimes	Conference with mediation team re: data issues and damages analysis ahead of mediation	1.0	565.00	565.00
3/1/2021	Laura Ho	Phone call w/ co-counsel re data issues and mediation preparation	1.0	990.00	990.00
3/1/2021	Ginger Grimes	Review consent to join form for filing	0.1	565.00	56.50
3/1/2021	Jacqueline Thompson	Review prolaw notifications (.1) Respond to correspondence from G. Grimes re tracking chart (.2); exchange correspondence re tracking consent to join submitted to court (.3); exchange correspondence w/ G. Grimes re filing consent to join for A. Benford (.2); efile A. Bengford consent to join and update tracking chart (.4);	1.2	365.00	438.00
3/1/2021	Scott Grimes (stat)	Calculate damages	3.9	390.00	1521.00
3/1/2021	Scott Grimes (stat)	Analyze L. Pardell damages calculations for opt-ins	0.6	390.00	234.00
3/1/2021	Scott Grimes (stat)	Phone call w/ co-counsel re data issues and mediation preparation	1.0	390.00	390.00
3/2/2021	Ginger Grimes	Correspondence to S. Kirkpatrick and J. Thompson re interview script for Dixon I opt-in	0.1	565.00	56.50
3/2/2021	Laura Ho	Correspondence w/ co-counsel re data issues	0.2	990.00	198.00
3/2/2021	Laura Ho	Strategy w/ D. Aaron re mediation process	0.3	990.00	297.00
3/2/2021	Stuart Kirkpatrick	Transmit Jeremy Darner interview notes to G. Grimes	0.1	350.00	35.00
3/2/2021	Jacqueline Thompson	Respond to correspondence from G. Grimes re consent to join tracking chart (.9)	0.9	365.00	328.50
3/2/2021	Scott Grimes (stat)	Calculate damages	5.1	390.00	1989.00
3/3/2021	Laura Ho	Phone call w/ co counsel re mediation process and data issues	0.5	990.00	495.00
3/3/2021	Scott Grimes (stat)	Calculate damages	4.9	390.00	1911.00
3/4/2021	Ginger Grimes	Correspondence to L. Ho re final list of opt-ins ahead of mediation	0.2	565.00	113.00
3/4/2021	Laura Ho	Correspondence and strategies w/ S. Grimes re data and damages	1.5	990.00	1485.00
3/4/2021	Jacqueline Thompson	Review correspondence between G. Grimes and L. Ho re opt ins tracking (.2); edits to tracking chart (.5); Phone call to M. Tidwell re consent to join form, draft email to M. Tidwell re same (.2);	0.9	365.00	328.50
3/4/2021	Scott Grimes (stat)	Strategy w/ L. Ho re data issues and damages	1.1	390.00	429.00
3/4/2021	Scott Grimes (stat)	Calculate damages	7.1	390.00	2769.00
3/5/2021	Laura Ho	Conferences w/ S. Grimes re data and damages	0.4	990.00	396.00
3/5/2021	Laura Ho	Correspondence w/ opposing counsel re opt in IDs	0.2	990.00	198.00
3/5/2021	Laura Ho	Phone call w/ co-counsel re mediation brief and damages	0.2	990.00	198.00
3/5/2021	Jacqueline Thompson	Review correspondence between attorneys re mediation (.1); respond to G. Grimes re opt in tracking chart (.3);	0.4	365.00	146.00
3/5/2021	Scott Grimes (stat)	Conference w/ L. Ho re damages and data issues	0.4	390.00	156.00
3/5/2021	Scott Grimes (stat)	Calculate damages	6.2	390.00	2418.00
3/8/2021	Ginger Grimes	Update internal tracking spreadsheet for Dixon I & II opt-ins	0.9	565.00	508.50
3/8/2021	Ginger Grimes	Correspondence to opposing counsel re class id information for opt-in ahead of mediation	0.1	565.00	56.50
3/8/2021	Ginger Grimes	Conference with L. Pardell, S. Grimes, L. Ho, D. Aaron, and M. Frandsen re damages estimates for mediation	0.5	565.00	282.50
3/8/2021	Ginger Grimes	Correspondence to M. Frandsen re mediation brief	0.1	565.00	56.50
3/8/2021	Stuart Kirkpatrick	Review worksite documents and transmit John Dickerson consent to join link to J. Thompson	0.1	350.00	35.00
3/8/2021	Ginger Grimes	Review S. Grimes damages estimate ahead of mediation	0.1	565.00	56.50
3/8/2021	Laura Ho	Revise mediation statement and correspondence w/ co-counsel re edits	0.3	990.00	297.00
3/8/2021	Laura Ho	Phone call w/ co-counsel re mediation statement and damages	0.5	990.00	495.00
3/8/2021	Laura Ho	Review S. Grimes damages calculations and phone calls re same, send to co-counsel	1.3	990.00	1287.00
3/8/2021	Scott Grimes (stat)	Conference w/ L. Ho, G. Grimes and co-counsel re damages and mediation preparation	0.5	390.00	195.00
3/8/2021	Scott Grimes (stat)	Phone call w/ L. Ho re damage calculations	0.5	390.00	195.00
3/8/2021	Scott Grimes (stat)	Calculate damages	7.0	390.00	2730.00
3/8/2021	Jacqueline Thompson	Review opt in forms and filing in respond to correspondence from G. Grimes re opt in missing from tracking chart (1.2); exchange correspondence w/ S. Grimes re opt in id number (.2);	1.4	365.00	511.00
3/9/2021	Ginger Grimes	Review opt-in damages estimates ahead of mediation	0.1	565.00	56.50
3/9/2021	Ginger Grimes	Conference with L. Ho, S. Grimes, L. Pardell, D. Aaron, M. Frandsen re damages estimate for mediation	0.8	565.00	452.00
3/9/2021	Ginger Grimes	Draft memo re California commission exemption application to appraisers for mediation	2.2	565.00	1243.00

Date	Professional	Narrative	Hours	Rate	Amount
3/9/2021	Laura Ho	Strategy w/ co-counsel re data and damages	0.8	990.00	792.00
3/9/2021	Laura Ho	Strategy w/ S. Grimes re damages calculations	1.2	990.00	1188.00
3/9/2021	Laura Ho	Correspondence w/ co-counsel re email to opposing counsel re class members and mediation arguments	0.4	990.00	396.00
3/9/2021	Laura Ho	Review and respond to G. Grimes draft re CA sales commission	0.4	990.00	396.00
3/9/2021	Ginger Grimes	Correspondence to co-counsel re California commission exemption analysis	0.2	565.00	113.00
3/9/2021	Jacqueline Thompson	Review correspondence from L. Ho re Dixon's pay information (.2); exchange correspondence w/ S. Kirkpatrick re J. Dickerson (.1); exchange correspondence w/ G. Grimes re updating opt in tracking chart and J. Dickerson consent to join (.4)	0.7	365.00	255.50
3/9/2021	Scott Grimes (stat)	Conference w L. Ho, G. Grimes and co-counsel re damages	0.8	390.00	312.00
3/9/2021	Scott Grimes (stat)	Strategy w/ L. Ho re damages	1.2	390.00	468.00
3/9/2021	Scott Grimes (stat)	Calculate damages	6.0	390.00	2340.00
3/10/2021	Ginger Grimes	Research status of opt-ins per defense counsel's dispute	0.8	565.00	452.00
3/10/2021	Ginger Grimes	Correspondence to S. Grimes re mediation damages analysis	0.1	565.00	56.50
3/10/2021	Ginger Grimes	Review S. Grimes damages analysis	0.4	565.00	226.00
3/10/2021	Jacqueline Thompson	Exchange correspondence w/ G. Grimes re opt in interviews (.4); exchange correspondence w/ S. Kirkpatrick re calling opt in class members (.4); phone call to H. Symmes (.1); respond to correspondence from G. Grimes re H. Symmes and C. Pike (.3)	1.2	365.00	438.00
3/10/2021	Ginger Grimes	Conference with team re mediation demand	0.6	565.00	339.00
3/10/2021	Ginger Grimes	Correspondence to opposing counsel re pay data for opt-in	0.1	565.00	56.50
3/10/2021	Stuart Kirkpatrick	Interview opt-in Kelly Beigle re: work experience at Cushman & Wakefield, and draft interview notes for G. Grimes use in mediation	0.7	350.00	245.00
3/10/2021	Stuart Kirkpatrick	Left voicemail for opt-in Chase Pike requesting interview re: work experience at Cushman & Wakefield	0.1	350.00	35.00
3/10/2021	Stuart Kirkpatrick	Analyze worksite and draft reply to G. Grimes inquiry re: completed opt-in interviews	0.1	350.00	35.00
3/10/2021	Ginger Grimes	Correspondence to L. Ho and S. Grimes re Dixon opt-in damages estimates	0.1	565.00	56.50
3/10/2021	Laura Ho	Phone call w/ co-counsel re damages calculations	0.5	990.00	495.00
3/10/2021	Laura Ho	Phone call w/ D. Dixon re mediation preparation	0.3	990.00	297.00
3/10/2021	Laura Ho	Correspondence w/ mediator re damages exposure	0.2	990.00	198.00
3/10/2021	Laura Ho	Correspondence w/ S. Grimes re damages calculations	1.0	990.00	990.00
3/10/2021	Scott Grimes (stat)	Exchange emails w/ L. Ho re damages calculations	1.0	390.00	390.00
3/10/2021	Scott Grimes (stat)	Calculate damages	6.1	390.00	2379.00
3/11/2021	Ginger Grimes	Correspondence to M. Frandsen re Colorado settlement	0.1	565.00	56.50
3/11/2021	Ginger Grimes	Conference with team re estimated damages ahead of mediation	1.0	565.00	565.00
3/11/2021	Ginger Grimes	Mediation with S. Rottman	9.8	565.00	5537.00
3/11/2021	Laura Ho	Preparation for and attend mediation	11.5	990.00	11385.00
3/11/2021	Jacqueline Thompson	Phone calls to H. Symmes re clarifying history (.2); exchange correspondence w/ G. Grimes re document produced by M. Edlund (.1); exchange correspondence w/ G. Grimes re w/ H. Symmes (.1); review correspondence from S. Kirkpatrick re C. Pike (.1);	0.5	365.00	182.50
3/11/2021	Scott Grimes (stat)	Phone call w/ L. Ho, G. Grimes and co-counsel re mediation preparation	1.0	390.00	390.00
3/11/2021	Scott Grimes (stat)	Draft mediation damages spreadsheet	0.9	390.00	351.00
3/11/2021	Scott Grimes (stat)	Memo to L. Pardell re class employment dates and weeks	0.3	390.00	117.00
3/11/2021	Scott Grimes (stat)	Review L. Pardell damages calculations for Seltz class	1.2	390.00	468.00
3/11/2021	Scott Grimes (stat)	Compare defendant class summary numbers with plaintiffs damages calculations	1.1	390.00	429.00
3/12/2021	Ginger Grimes	Correspondence with L. Ho re settlement administration	0.4	565.00	226.00
3/12/2021	Laura Ho	Correspondence w/ G. Grimes re administration costs	0.2	990.00	198.00
3/12/2021	Laura Ho	Correspondence w/ co-counsel re settlement strategy and administration costs	0.3	990.00	297.00
3/12/2021	Laura Ho	Conference w/ S. Grimes re allocation calculations for settlement strategy discussion	0.8	990.00	792.00
3/12/2021	Scott Grimes (stat)	Conference w. L. Ho settlement distribution models	0.8	390.00	312.00
3/12/2021	Scott Grimes (stat)	Draft spreadsheet for modeling settlement distribution	1.1	390.00	429.00
3/15/2021	Ginger Grimes	Conference with team re mediation and settlement issues	0.5	565.00	282.50
3/15/2021	Ginger Grimes	Correspondence to CPT re states covered by Dixon class lists	0.1	565.00	56.50

Date	Professional	Narrative	Hours	Rate	Amount
3/15/2021	Laura Ho	Strategy call w/ co-counsel re settlement	0.5	990.00	495.00
3/15/2021	Laura Ho	Conferences w/ S. Grimes re settlement allocation calculator and correspondence w/ co-counsel re same	0.8	990.00	792.00
3/15/2021	Jacqueline Thompson	Prepare Michael Tidwell consent to join, update tracking chart re same	0.5	365.00	182.50
3/15/2021	Scott Grimes (stat)	Phone call w/ L. Ho re settlement distribution model	0.2	390.00	78.00
3/15/2021	Scott Grimes (stat)	Update chart for settlement distribution model	0.1	390.00	39.00
3/16/2021	Laura Ho	Correspondence w/ co-counsel re settlement allocations	0.4	990.00	396.00
3/16/2021	Laura Ho	Communications w/ D. Dixon re settlement offer and allocations	0.2	990.00	198.00
3/16/2021	Laura Ho	Phone call w/ D. Dixon re settlement and her share, memo to file re same	0.4	990.00	396.00
3/16/2021	Scott Grimes (stat)	Calculate estimated settlement distributions	0.9	390.00	351.00
3/16/2021	Jacqueline Thompson	Review correspondence between G. Grimes and L. Ho re filing consent to join for M. Tidwell	0.1	365.00	36.50
3/17/2021	Laura Ho	Correspondence w/ D. Aaron re settlement acceptance	0.2	990.00	198.00
3/17/2021	Laura Ho	Phone call w/ D. Aaron and S. Rottman re settlement acceptance	0.2	990.00	198.00
3/18/2021	Laura Ho	Phone call w/ D. Aaron and opposing counsel re settlement structure	0.6	990.00	594.00
3/19/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re settlement approval strategy	1.0	565.00	565.00
3/19/2021	Laura Ho	LR re personal jurisdiction issues, settlement terms approval in ND Cal., DC and state court, correspondence w/ co-counsel re same	2.0	990.00	1980.00
3/19/2021	Laura Ho	Phone call w/ D. Aaron, M. Frandsen, G. Grimes re settlement structure strategy	1.0	990.00	990.00
3/22/2021	Ginger Grimes	Research San Francisco Superior Court approval process	1.1	565.00	621.50
3/22/2021	Laura Ho	Legal research re SF Superior and ND Cal settlement approvals, correspondence w/ co-counsel re same	1.2	990.00	1188.00
3/23/2021	Ginger Grimes	Conference with L. Ho, M. Frandsen, and D. Aaron re settlement approval strategy	0.5	565.00	282.50
3/23/2021	Ginger Grimes	Research settlement approvals in SF Superior Court	0.3	565.00	169.50
3/23/2021	Jacqueline Thompson	Respond to L. Ho correspondence re SF court assignment (.5); respond to correspondence w/ L. Ho re settlement agreement (.4);	0.9	365.00	328.50
3/23/2021	Laura Ho	Phone call w/ co-counsel re settlement strategy	0.5	990.00	495.00
3/23/2021	Laura Ho	Correspondence w/ co-counsel re other settlements approved in DC and ND Cal	0.3	990.00	297.00
3/25/2021	Laura Ho	Phone call w/ co-counsel re settlement drafting and venue, case management conference statement draft	0.4	990.00	396.00
3/25/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re strategy for settlement approval	0.4	565.00	226.00
3/26/2021	Laura Ho	Review and revise draft case management conference statement, correspondence w/ D. Aaron re schedule	0.3	990.00	297.00
3/26/2021	Laura Ho	Correspondence w/ D. Aaron re long form drafting	0.2	990.00	198.00
3/26/2021	Laura Ho	Correspondence w/ D. Aaron re response to opposing counsel re case management conference	0.1	990.00	99.00
3/26/2021	Laura Ho	Correspondence w/ G. Grimes re approval brief	0.1	990.00	99.00
3/29/2021	Laura Ho	Correspondence w/ D. Aaron re status report edits	0.2	990.00	198.00
3/30/2021	Laura Ho	Correspondence w/ J. Thompson and S. Kirkpatrick re status reports	0.2	990.00	198.00
3/30/2021	Stuart Kirkpatrick	Draft Joint Status Reports for both USDC Northern CA Cushman cases, for L. Ho	0.9	350.00	315.00
3/30/2021	Stuart Kirkpatrick	Edit Joint Status Reports per L. Ho instructions and finalize in preparation for efilig	0.2	350.00	70.00
3/30/2021	Stuart Kirkpatrick	Efile Joint Status Reports in both USDC Northern CA Cushman cases	0.2	350.00	70.00
3/30/2021	Jacqueline Thompson	Review correspondence between L. Ho and S. Kirkpatrick re status reports	0.2	365.00	73.00
3/31/2021	Jacqueline Thompson	Update prolaw re upcoming deadlines	0.1	365.00	36.50
4/2/2021	Laura Ho	Review and revise settlement agreement draft and correspondence w/ D. Aaron re edits and follow up	1.2	990.00	1188.00
4/5/2021	Ginger Grimes	Review draft settlement agreement	0.2	565.00	113.00
4/5/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re settlement agreement	0.6	565.00	339.00
4/5/2021	Laura Ho	Phone call w/ co-counsel and G. Grimes re settlement agreement edits	0.6	990.00	594.00
4/5/2021	Laura Ho	Review settlement re class counsel definition and correspondence w/ co-counsel re same	0.3	990.00	297.00

Date	Professional	Narrative	Hours	Rate	Amount
4/6/2021	Laura Ho	Review and revise settlement agreement draft, correspondence w/ co-counsel re strategy	1.2	990.00	1188.00
4/7/2021	Ginger Grimes	Draft preliminary approval motion	0.6	565.00	339.00
4/7/2021	Jacqueline Thompson	Exchange correspondence w/ L. Ho re filing consent to join from M. Goldberg (.1); prepare M. Goldberg consent to join for filing w/ court (.3); file M. Goldberg consent to join form (.2);	0.6	365.00	219.00
4/7/2021	Laura Ho	Phone call w/ D. Aaron re settlement agreement edits	0.5	990.00	495.00
4/7/2021	Laura Ho	Phone call w/ S. Grimes re eligible workweek calculations	0.5	990.00	495.00
4/7/2021	Laura Ho	Correspondence w/ D. Aaron re settlement agreement edits and data for settlement administrator	0.6	990.00	594.00
4/7/2021	Scott Grimes (stat)	Conference w/ L. Ho re eligible workweeks	0.5	390.00	195.00
4/7/2021	Scott Grimes (stat)	Analyze employment and pay data re class weeks	2.9	390.00	1131.00
4/8/2021	Laura Ho	Correspondence w/ S. Grimes re class member list	0.2	990.00	198.00
4/8/2021	Laura Ho	Correspondence w/ co-counsel re eligible workweek definition and class members and workweeks	0.3	990.00	297.00
4/8/2021	Scott Grimes (stat)	Analyze employment, payroll, and opt-in data re class weeks	2.9	390.00	1131.00
4/12/2021	Laura Ho	Phone call w/ S. Grimes re eligible workweeks	0.2	990.00	198.00
4/12/2021	Laura Ho	Correspondence w/ co-counsel re settlement agreement draft to opposing counsel	0.2	990.00	198.00
4/12/2021	Laura Ho	Correspondence w/ M. Wong re settlement agreement status	0.1	990.00	99.00
4/12/2021	Scott Grimes (stat)	Conference w/ L. Ho re eligible work weeks	0.2	390.00	78.00
4/12/2021	Scott Grimes (stat)	Update settlement agreement re class weeks; memo to L. Ho re same	0.5	390.00	195.00
4/14/2021	Ginger Grimes	Draft preliminary approval motion	2.6	565.00	1469.00
4/16/2021	Laura Ho	Correspondence w/ G. Grimes re release language and approval papers	0.2	990.00	198.00
4/16/2021	Ginger Grimes	Draft motion for preliminary approval	1.6	565.00	904.00
4/19/2021	Laura Ho	Correspondence w/ D. Aaron and M. Wong re talk re settlement status	0.2	990.00	198.00
4/20/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and opposing counsel re settlement agreement negotiation	0.7	565.00	395.50
4/20/2021	Laura Ho	Phone call w/ opposing counsel re settlement agreement, correspondence w/ D. Aaron re same	0.6	990.00	594.00
4/26/2021	Laura Ho	Draft email to M. Wong re settlement draft ETA	0.1	990.00	99.00
4/26/2021	Laura Ho	Correspondence w/ co-counsel and opposing counsel re additional 30 days to file settlement	0.2	990.00	198.00
4/28/2021	Ginger Grimes	Review draft joint status report	0.1	565.00	56.50
4/28/2021	Laura Ho	Correspondence w/ D. Aaron and M. Wong re status reports	0.2	990.00	198.00
5/5/2021	Laura Ho	Correspondence w/ D. Dixon re status of settlement	0.2	990.00	198.00
5/10/2021	Laura Ho	Review defense settlement edits, correspondence w/ co-counsel re revisions and strategy	0.8	990.00	792.00
5/10/2021	Ginger Grimes	Review L. Ho revisions to settlement agreement draft	0.5	565.00	282.50
5/11/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re Cushman's edits on settlement agreement draft	1.0	565.00	565.00
5/11/2021	Laura Ho	Phone call w/ co-counsel re settlement agreement edits	1.0	990.00	990.00
5/12/2021	Laura Ho	Correspondence w/ M. Wong re questions on drafts; phone call to discuss	0.2	990.00	198.00
5/14/2021	Ginger Grimes	Review documents in preparation for conference with opposing counsel re settlement agreement	0.1	565.00	56.50
5/14/2021	Ginger Grimes	Conference with opposing counsel re settlement agreement	0.9	565.00	508.50
5/14/2021	Ginger Grimes	Conference with L. Ho and D. Aaron re case assignments	0.1	565.00	56.50
5/14/2021	Laura Ho	Correspondence w/ M. Frandsen re settlement timeline	0.2	990.00	198.00
5/14/2021	Laura Ho	Phone call w/ opposing counsel, D. Aaron, G. Grimes re settlement agreement edits	0.9	990.00	891.00
5/14/2021	Laura Ho	Review updated class data and correspondence w/ S. Grimes re do we need compensation	0.2	990.00	198.00
5/14/2021	Laura Ho	Edit settlement agreement	4.0	990.00	3960.00
5/17/2021	Ginger Grimes	Draft preliminary approval motion	0.7	565.00	395.50
5/17/2021	Ginger Grimes	Correspondence to co-counsel re ND Cal preliminary approval guidelines	0.1	565.00	56.50
5/17/2021	Ginger Grimes	Draft preliminary approval motion	1.3	565.00	734.50
5/17/2021	Laura Ho	Revise settlement agreement and correspondence w/ co-counsel re revisions, calculations and Wed. conference	2.0	990.00	1980.00

Date	Professional	Narrative	Hours	Rate	Amount
5/17/2021	Laura Ho	Correspondence w/ G. Grimes re preliminary approval papers	0.2	990.00	198.00
5/17/2021	Jacqueline Thompson	Draft correspondence to S. Kirkpatrick re L. Ho correspondence re promissory notes	0.1	365.00	36.50
5/18/2021	Jacqueline Thompson	Respond to correspondence from L. Ho re promissory note	0.1	365.00	36.50
5/19/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re settlement agreement language	1.2	565.00	678.00
5/19/2021	Stuart Kirkpatrick	Analyze Defendant production files, and collect promissory notes (templates, redacted examples, and Plaintiff's) for L. Ho review	0.3	350.00	105.00
5/19/2021	Laura Ho	Phone call w/ co-counsel re settlement agreement and notice edits	1.2	990.00	1188.00
5/19/2021	Laura Ho	Phone call w/ S. Grimes re settlement allocation calculations	0.3	990.00	297.00
5/19/2021	Laura Ho	Review and revise Dixon 1 notice, correspondence w/ co-counsel re edits	0.5	990.00	495.00
5/19/2021	Scott Grimes (stat)	Conference w/ L. Ho re settlement allocation	0.3	390.00	117.00
5/19/2021	Scott Grimes (stat)	Create spreadsheet for settlement allocations calculations	0.7	390.00	273.00
5/20/2021	Laura Ho	Correspondence w/ opposing counsel re settlement agreement drafts	0.2	990.00	198.00
5/20/2021	Laura Ho	Further revisions to settlement agreement and correspondence w/ co-counsel re edits	1.5	990.00	1485.00
5/20/2021	Laura Ho	Correspondence w/ M. Frandsen re PAGA settlement letter	0.2	990.00	198.00
5/20/2021	Scott Grimes (stat)	Revise settlement allocation spreadsheet	1.3	390.00	507.00
5/20/2021	Scott Grimes (stat)	Memo to L. Ho re named plaintiff damages	0.3	390.00	117.00
5/21/2021	Laura Ho	Correspondence w/ D. Aaron re revised workweek calculations	0.3	990.00	297.00
5/21/2021	Scott Grimes (stat)	Revise settlement allocation workbook	1.2	390.00	468.00
5/22/2021	Laura Ho	Review and respond to M. Frandsen email re edited settlement agreement	0.3	990.00	297.00
5/24/2021	Ginger Grimes	Conference with D. Aaron, M. Frandsen, and L. Ho re settlement agreement	0.9	565.00	508.50
5/24/2021	Laura Ho	Edit drafts of notices and correspondence w/ M. Frandsen re same	0.8	990.00	792.00
5/24/2021	Laura Ho	Strategy w/ co-counsel re settlement agreement edits	0.9	990.00	891.00
5/24/2021	Laura Ho	Correspondence w/ M. Frandsen re additional edits to notices	0.2	990.00	198.00
5/24/2021	Laura Ho	Further revisions to settlement agreement and correspondence w/ opposing counsel re changes	2.0	990.00	1980.00
5/24/2021	Scott Grimes (stat)	Update awards distribution workbook	0.5	390.00	195.00
5/25/2021	Laura Ho	Further revisions to notices and correspondence w/ co-counsel re sending to defense counsel and administrators	0.4	990.00	396.00
5/25/2021	Laura Ho	Phone call w/ D. Dixon re overtime claims.	1.0	990.00	990.00
5/26/2021	Laura Ho	Correspondence w/ D. Aaron re status report and schedule for filing for approval	0.1	990.00	99.00
5/27/2021	Laura Ho	Correspondence w/ D. Aaron re status reports	0.1	990.00	99.00
5/28/2021	Laura Ho	Correspondence w/ co-counsel re finalizing status reports	0.2	990.00	198.00
6/4/2021	Laura Ho	Correspondence w/ opposing counsel re settlement agreement edits	0.1	990.00	99.00
6/4/2021	Laura Ho	Correspondence w/ D. Aaron re opt in list to attach to settlement	0.2	990.00	198.00
6/4/2021	Laura Ho	Correspondence w/ D. Aaron re opting in Chester to Dixon II	0.2	990.00	198.00
6/7/2021	Laura Ho	Correspondence w/ S. Grimes re opt in list for exhibit	0.1	990.00	99.00
6/7/2021	Scott Grimes (stat)	Phone call w/ J. Thompson re opt-in list for settlement agreement	0.2	390.00	78.00
6/7/2021	Scott Grimes (stat)	Edit opt-in list for settlement agreement	0.8	390.00	312.00
6/7/2021	Jacqueline Thompson	Conference w/ S. Grimes re op ins date of employment (.2); Review case files re comparing of Dixon data against case file re dates of employment (.6)	0.8	365.00	292.00
6/8/2021	Ginger Grimes	Draft preliminary approval motion	6.8	565.00	3842.00
6/8/2021	Laura Ho	Correspondence w/ opposing counsel re settlement agreement conference	0.1	990.00	99.00
6/8/2021	Jacqueline Thompson	Review and respond correspondence from S. Kirkpatrick and G. Grimes re finalizing final approval brief and supporting documents and LWDA upload	1.3	365.00	474.50
6/9/2021	Ginger Grimes	Draft preliminary approval brief	1.2	565.00	678.00
6/9/2021	Laura Ho	Phone call w/ opposing counsel and co-counsel re edits to settlement agreement	1.3	990.00	1287.00
6/9/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, M. Frandsen, T. Petrides, and M. Wong re negotiating settlement agreement	1.3	565.00	734.50
6/14/2021	Ginger Grimes	Draft preliminary approval motion	4.4	565.00	2486.00
6/14/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re settlement agreement	0.4	565.00	226.00

Date	Professional	Narrative	Hours	Rate	Amount
6/14/2021	Laura Ho	Review draft from opposing counsel re settlement agreement edits, correspondence w/ co-counsel re same and paralegals re 6/21 filing	0.6	990.00	594.00
6/14/2021	Laura Ho	Phone call w/ D. Dixon re settlement update	0.4	990.00	396.00
6/14/2021	Laura Ho	Correspondence w/ G. Grimes re comparable settlements for approval papers	0.3	990.00	297.00
6/14/2021	Jacqueline Thompson	Review correspondence from L. Ho re preliminary approval filing	0.2	365.00	73.00
6/15/2021	Ginger Grimes	Draft preliminary approval motion	1.6	565.00	904.00
6/15/2021	Laura Ho	Correspondence w/ co-counsel re Seltz declaration draft	0.2	990.00	198.00
6/15/2021	Laura Ho	Correspondence w/ co-counsel re fees and costs for approval papers	0.3	990.00	297.00
6/15/2021	Laura Ho	Correspondence w/ G. Grimes re approval papers	0.3	990.00	297.00
6/16/2021	Ginger Grimes	Draft preliminary approval brief	3.8	565.00	2147.00
6/16/2021	Ginger Grimes	Correspondence with J. Thompson and S. Kirkpatrick re preliminary approval filing	0.2	565.00	113.00
6/16/2021	Laura Ho	Work on settlement agreement, correspondence w/ S. Grimes re allocation and data	1.5	990.00	1485.00
6/16/2021	Laura Ho	Strategy w/ D. Aaron re settlement agreement	0.8	990.00	792.00
6/16/2021	Laura Ho	Draft response to opposing counsel re settlement agreement edits	0.4	990.00	396.00
6/16/2021	Jacqueline Thompson	Exchange correspondence w/ G. Grimes re preliminary approval hearing date, (.9); exchange correspondence w/ G. Grimes re timeline re settlement (.2); exchange correspondence w/ S. Kirkpatrick re settlement timeline (.3);	1.4	365.00	511.00
6/16/2021	Stuart Kirkpatrick	Analyze draft settlement agreement, and create spreadsheet of deadlines for G. Grimes use in preparing preliminary approval filing	1.2	350.00	420.00
6/16/2021	Scott Grimes (stat)	Update estimated awards calculations	1.6	390.00	624.00
6/16/2021	Scott Grimes (stat)	Conference w/ L. Ho re calculation of awards	0.2	390.00	78.00
6/17/2021	Ginger Grimes	Draft plaintiff declaration for preliminary approval	0.1	565.00	56.50
6/17/2021	Laura Ho	Correspondence w/ D. Aaron re what still needs to be done before Monday's filing deadline	0.2	990.00	198.00
6/17/2021	Ginger Grimes	Draft preliminary approval motion	1.2	565.00	678.00
6/17/2021	Laura Ho	Draft individual releases and circulate to co-counsel	0.4	990.00	396.00
6/17/2021	Laura Ho	Review and respond to T. Petrides memo re end of covered period, strategy w/ D. Aaron re same	0.4	990.00	396.00
6/17/2021	Laura Ho	Review edits to settlement agreement and correspondence w/ M. Frandsen re additional ones and exhibits	0.6	990.00	594.00
6/17/2021	Laura Ho	Correspondence w/ S. Grimes and G. Grimes re approval papers and numbers	0.2	990.00	198.00
6/17/2021	Jacqueline Thompson	Respond to correspondence from L. Ho re briefing schedule re preliminary approval (.6); review correspondence between attorneys re briefing schedule (.2)	0.8	365.00	292.00
6/18/2021	Laura Ho	Draft status report and correspondence w/ opposing counsel re settlement status	0.4	990.00	396.00
6/18/2021	Ginger Grimes	Draft motion for preliminary approval	1.3	565.00	734.50
6/18/2021	Ginger Grimes	Draft plaintiff declaration for preliminary approval	0.2	565.00	113.00
6/21/2021	Ginger Grimes	Revise preliminary approval brief	0.6	565.00	339.00
6/21/2021	Ginger Grimes	Draft second amended complaint for settlement purposes	2.9	565.00	1638.50
6/21/2021	Ginger Grimes	Conference with S. Grimes re average awards for settlement class members	0.3	565.00	169.50
6/21/2021	Jacqueline Thompson	Exchange correspondence w/ L. Ho re preparing joint status report for filing w/ court (.3); efile joint status report (.4); respond to correspondence from G. Grimes re Seltz complaint (.3); review and respond to correspondence from L. Ho re case telephone number (.4);	1.4	365.00	511.00
6/21/2021	Laura Ho	Revise, finalize and have filed joint status reports	0.3	990.00	297.00
6/21/2021	Laura Ho	Review and revise draft SAC and correspondence w/ G. Grimes re edits	0.6	990.00	594.00
6/21/2021	Laura Ho	Review and edit revised settlement agreement and notices, correspondence w/ M. Frandsen re same	0.4	990.00	396.00
6/21/2021	Scott Grimes (stat)	Revise calculations of estimated awards	0.5	390.00	195.00
6/22/2021	Laura Ho	Further revisions to SAC and correspondence w/ G. Grimes re same	0.4	990.00	396.00
6/22/2021	Laura Ho	Review and revise memorandum of points and authorities re preliminary approval and correspondence w/ G. Grimes re same	0.6	990.00	594.00
6/22/2021	Ginger Grimes	Revise second amended complaint for settlement	0.4	565.00	226.00
6/22/2021	Ginger Grimes	Revise preliminary approval motion	0.3	565.00	169.50
6/22/2021	Ginger Grimes	Revise preliminary approval motion	0.5	565.00	282.50

Date	Professional	Narrative	Hours	Rate	Amount
6/22/2021	Laura Ho	Correspondence w/ co-counsel re sending settlement agreement and exhibits to opposing counsel and next steps	0.3	990.00	297.00
6/22/2021	Ginger Grimes	Draft Dixon declaration for preliminary approval	0.2	565.00	113.00
6/22/2021	Ginger Grimes	Conference with client D. Dixon re preliminary approval declaration	0.1	565.00	56.50
6/22/2021	Ginger Grimes	Conference with S. Grimes re claims rate in comparable cases	0.1	565.00	56.50
6/22/2021	Ginger Grimes	Correspondence to S. Kirkpatrick re proposed order for preliminary approval	0.1	565.00	56.50
6/22/2021	Jacqueline Thompson	Exchange correspondence w/ S. Kirkpatrick re cleaning case voice mail,	0.3	365.00	109.50
6/22/2021	Scott Grimes (stat)	Conference w/ G. Grimes re comparable settlements	0.1	390.00	39.00
6/23/2021	Laura Ho	Correspondence w/ G. Grimes re edits to preliminary approval order	0.2	990.00	198.00
6/23/2021	Ginger Grimes	Revise proposed order	0.1	565.00	56.50
6/23/2021	Ginger Grimes	Correspondence to S. Grimes re preliminary approval motion	0.1	565.00	56.50
6/23/2021	Ginger Grimes	Voicemail for client D. Dixon	0.1	565.00	56.50
6/23/2021	Ginger Grimes	Conference with D. Dixon re preliminary approval declaration	0.9	565.00	508.50
6/23/2021	Ginger Grimes	Draft Dixon declaration for preliminary approval	0.3	565.00	169.50
6/23/2021	Laura Ho	Correspondence w/ G. Grimes re D. Dixon declaration	0.3	990.00	297.00
6/23/2021	Laura Ho	Review finalized settlement agreement and correspondence w/ co-counsel re signature	0.3	990.00	297.00
6/23/2021	Stuart Kirkpatrick	Analyze local rules and settlement deadline chart, and draft reply to G. Grimes inquiry re: estimated time between preliminary approval order and earliest possible final approval hearing date	0.4	350.00	140.00
6/23/2021	Scott Grimes (stat)	Research re comparable settlements; memo to G. Grimes re same	2.9	390.00	1131.00
6/24/2021	Jacqueline Thompson	Review correspondence from S. Kirkpatrick re preliminary approval briefing deadlines (.1); respond to G. Grimes re word version of proposed order (.3)	0.4	365.00	146.00
6/24/2021	Ginger Grimes	Conference with L. Ho, D. Aaron, and M. Frandsen re settlement agreement and preliminary approval	0.8	565.00	452.00
6/24/2021	Laura Ho	Phone call w/ co-counsel and G. Grimes re preliminary approval filing	0.8	990.00	792.00
6/24/2021	Ginger Grimes	Revise preliminary approval motion	0.4	565.00	226.00
6/24/2021	Ginger Grimes	Correspondence to S. Kirkpatrick re settlement schedule	0.1	565.00	56.50
6/24/2021	Ginger Grimes	Review revised second amended complaint	0.2	565.00	113.00
6/24/2021	Laura Ho	Edits to preliminary approval memorandum of points and authorities and correspondence w/ G. Grimes re edits	0.1	990.00	99.00
6/24/2021	Laura Ho	Edits to SAC and correspondence w/ co-counsel re edits	0.1	990.00	99.00
6/24/2021	Ginger Grimes	Revise preliminary approval brief	0.2	565.00	113.00
6/24/2021	Ginger Grimes	Revise second amended complaint	0.2	565.00	113.00
6/24/2021	Ginger Grimes	Correspondence to opposing counsel re drafts of second amended complaint and preliminary approval brief	0.1	565.00	56.50
6/24/2021	Stuart Kirkpatrick	Edit settlement deadlines chart per G. Grimes instructions and create fixed chronological order of events for use in preliminary approval filing	0.3	350.00	105.00
6/24/2021	Scott Grimes (stat)	Email G. Grimes re comparable settlement opt-in rates	0.2	390.00	78.00
6/24/2021	Scott Grimes (stat)	Email G. Grimes re estimated class awards	0.1	390.00	39.00
6/25/2021	Ginger Grimes	Correspondence to L. Ho re settlement notices	0.1	565.00	56.50
6/25/2021	Ginger Grimes	Correspondence to D. Aaron and M. Frandsen re settlement notices	0.1	565.00	56.50
6/25/2021	Laura Ho	Review and respond to M. Frandsen memo re revised notices	0.2	990.00	198.00
6/25/2021	Stuart Kirkpatrick	Legal cite-check and edit Preliminary Approval brief	3.1	350.00	1085.00
6/25/2021	Jacqueline Thompson	Review correspondence from G. Grimes and S. Kirkpatrick re cite checking final approval brief	0.2	365.00	73.00
6/28/2021	Laura Ho	Correspondence w/ D. Aaron re cy pres	0.1	990.00	99.00
6/28/2021	Stuart Kirkpatrick	Complete legal cite check and edits of Preliminary Approval brief	2.3	350.00	805.00
6/28/2021	Jacqueline Thompson	Review correspondence from S. Kirkpatrick re cite checking preliminary approval brief	0.1	365.00	36.50
6/29/2021	Ginger Grimes	Review M. Wong edits to preliminary approval motion	0.1	565.00	56.50
6/29/2021	Ginger Grimes	Draft Ho declaration re preliminary approval	0.2	565.00	113.00
6/29/2021	Ginger Grimes	Review S. Kirkpatrick edits to preliminary approval brief	0.1	565.00	56.50
6/29/2021	Ginger Grimes	Revise preliminary approval motion	0.4	565.00	226.00
6/29/2021	Stuart Kirkpatrick	Add Defendant's edits to Preliminary Approval brief, for G. Grimes	0.1	350.00	35.00
6/29/2021	Stuart Kirkpatrick	Cite check and edit new legal citation additions to Preliminary Approval brief	0.2	350.00	70.00

Date	Professional	Narrative	Hours	Rate	Amount
6/29/2021	Stuart Kirkpatrick	Fact check and edit Preliminary Approval brief citations to Settlement Agreement	1.5	350.00	525.00
6/29/2021	Ginger Grimes	Review and revise D. Aaron declaration for preliminary approval	0.4	565.00	226.00
6/29/2021	Ginger Grimes	Review and revise preliminary approval brief	0.2	565.00	113.00
6/29/2021	Ginger Grimes	Correspondence with M. Frandsen re preliminary approval papers	0.2	565.00	113.00
6/29/2021	Ginger Grimes	Revise Dixon declaration	0.2	565.00	113.00
6/29/2021	Jacqueline Thompson	Review correspondence from G. Grimes re settlement agreement and fact checking preliminary approval brief (.4); exchange correspondence w/ S. Kirkpatrick re fact checking (.2); Review correspondence between G. Grimes and S. Kirkpatrick re cite checking preliminary approval brief (.2)	0.8	365.00	292.00
6/29/2021	Laura Ho	Correspondence w/ G. Grimes re revisions to memorandum of points and authorities re preliminary approval	0.2	990.00	198.00
6/30/2021	Ginger Grimes	Revise preliminary approval papers	2.3	565.00	1299.50
6/30/2021	Ginger Grimes	Correspondence with S. Kirkpatrick and J. Thompson re compiled final agreement	0.2	565.00	113.00
6/30/2021	Ginger Grimes	Correspondence with D. Dixon re preliminary approval declaration	0.1	565.00	56.50
6/30/2021	Ginger Grimes	Revise preliminary approval papers	0.5	565.00	282.50
6/30/2021	Ginger Grimes	Finalize preliminary approval papers	1.5	565.00	847.50
6/30/2021	Ginger Grimes	Prepare stipulation re second amended complaint for filing	0.5	565.00	282.50
6/30/2021	Stuart Kirkpatrick	Edit caption on settlement agreement, per G. Grimes instructions	0.2	350.00	70.00
6/30/2021	Stuart Kirkpatrick	Analyze Dixon declaration and edit memorandum of points and authorities with declaration citations	0.3	350.00	105.00
6/30/2021	Stuart Kirkpatrick	Finalize and assemble settlement agreement with all exhibits A-L	0.9	350.00	315.00
6/30/2021	Stuart Kirkpatrick	Finalize Second Amended Complaint, with three LWDA notice exhibits, in preparation for filing	0.5	350.00	175.00
6/30/2021	Stuart Kirkpatrick	Upload settlement agreement to OneDrive, for G. Grimes transmittal to opposing counsel	0.1	350.00	35.00
6/30/2021	Laura Ho	Review and revise Ho declaration and correspondence w/ G. Grimes re same	0.3	990.00	297.00
6/30/2021	Jacqueline Thompson	Fact check preliminary approval brief (2.0); review correspondence between S. Kirkpatrick and G. Grimes re preliminary approval briefing and supporting documents (.3); review correspondence between S. Kirkpatrick and G. Grimes re Order to file second amended complaint (.2)	2.5	365.00	912.50
7/1/2021	Ginger Grimes	Review order granting leave to file SAC	0.1	565.00	56.50
7/1/2021	Ginger Grimes	Review L. Ho edits to Ho declaration	0.3	565.00	169.50
7/1/2021	Ginger Grimes	Review SLG preliminary approval declaration	0.1	565.00	56.50
7/1/2021	Ginger Grimes	Finalize approval papers for filing	4.0	565.00	2260.00
7/1/2021	Stuart Kirkpatrick	Efile Second Amended Complaint	0.3	350.00	105.00
7/1/2021	Stuart Kirkpatrick	Analyze Ho Declaration and edit sections per G. Grimes comments	0.5	350.00	175.00
7/1/2021	Stuart Kirkpatrick	Assemble and finalize Ho Declaration exhibits	0.8	350.00	280.00
7/1/2021	Stuart Kirkpatrick	Analyze memorandum of points and authorities and edit Ho Declaration citations	1.6	350.00	560.00
7/1/2021	Stuart Kirkpatrick	Analyze Ho Declaration and edit Seltz and Meireles declaration citations	0.7	350.00	245.00
7/1/2021	Stuart Kirkpatrick	PDF and finalize Proposed Order	0.1	350.00	35.00
7/1/2021	Stuart Kirkpatrick	Edit captions of all preliminary approval supporting documents to match edits to memorandum of points and authorities caption	0.5	350.00	175.00
7/1/2021	Stuart Kirkpatrick	Exchange emails with J. Thompson to review e-filing rules re: exhibits and supporting documents	0.2	350.00	70.00
7/1/2021	Stuart Kirkpatrick	Analyze drafts of Table of Authorities, and email edits to WP	0.5	350.00	175.00
7/1/2021	Stuart Kirkpatrick	Analyze memorandum of points and authorities and email J. Thompson re: missing Aaron declaration citations	0.2	350.00	70.00
7/1/2021	Stuart Kirkpatrick	Analyze memorandum of points and authorities updated versions to confirm all G. Grimes requested edits were incorporated	0.6	350.00	210.00
7/1/2021	Stuart Kirkpatrick	Edit Proposed Order title and footer per G. Grimes request	0.2	350.00	70.00
7/1/2021	Stuart Kirkpatrick	Finalize all Preliminary Approval filing pdfs, and efile in N.D. Cal.	0.7	350.00	245.00
7/1/2021	Laura Ho	Correspondence w/ G. Grimes re preliminary approval filing	0.3	990.00	297.00
7/1/2021	Jacqueline Thompson	Fact check preliminary approval brief and supporting documents, finalize brief and supporting documents re filing	6.5	365.00	2372.50
7/2/2021	Ginger Grimes	Correspondence to J. Thompson and S. Kirkpatrick re preliminary approval hearing	0.1	565.00	56.50

Date	Professional	Narrative	Hours	Rate	Amount
7/15/2021	Jacqueline Thompson	Review defendant's statement of non opposition to preliminary approval	0.2	365.00	73.00
7/26/2021	Jacqueline Thompson	Respond to correspondence from L. Ho re mediation preparation	0.1	365.00	36.50
7/27/2021	Jacqueline Thompson	Respond to correspondence from L. Ho re hearing preparation (.2); Exchange correspondence w/ S. Kirkpatrick and D. Valdez re mediation preparation (.1); hearing preparation (.6);	0.9	365.00	328.50
7/28/2021	Jacqueline Thompson	Review correspondence from G. Grimes and L. Ho re appearance at hearing	0.1	365.00	36.50
7/29/2021	Jacqueline Thompson	Respond to correspondence from L. Ho and G. Grimes re appearance at hearing, email to L. Ho and G. Grimes re same	0.2	365.00	73.00
8/2/2021	Ginger Grimes	Conference with team re preparation for preliminary approval hearing	0.1	565.00	56.50
8/2/2021	Laura Ho	Phone call w/ co-counsel re preliminary approval hearing preparation	0.1	990.00	99.00
8/2/2021	Jacqueline Thompson	Respond to correspondence re hearing preparation	0.2	365.00	73.00
8/4/2021	Ginger Grimes	Review preliminary approval papers for hearing	0.8	565.00	452.00
8/4/2021	Laura Ho	Review court order re moving preliminary approval hearing and court questions	0.1	990.00	99.00
8/5/2021	Ginger Grimes	Review order requesting supplemental briefing	0.1	565.00	56.50
8/5/2021	Laura Ho	Review order re questions re settlement and strategy to answer	0.4	990.00	396.00
8/5/2021	Ginger Grimes	Review court's cited cases re reversions	0.2	565.00	113.00
8/5/2021	Jacqueline Thompson	Review order re supplemental briefing (.2); respond to correspondence from L. Ho re updating proalw re briefing schedule (.2);	0.4	365.00	146.00
8/5/2021	Scott Grimes (stat)	Update award distribution estimates	0.8	390.00	312.00
8/6/2021	Ginger Grimes	Conference with D. Aaron, L. Ho, and M. Frandsen re supplemental briefing	0.3	565.00	169.50
8/6/2021	Laura Ho	Review court's questions to preparation for call w/ co-counsel	0.3	990.00	297.00
8/6/2021	Laura Ho	Strategy w/ co-counsel re responding to court's questions	0.3	990.00	297.00
8/6/2021	Ginger Grimes	Draft supplemental briefing as requested by court	3.7	565.00	2090.50
8/6/2021	Ginger Grimes	Conference with S. Grimes re data questions for supplemental briefing	0.7	565.00	395.50
8/6/2021	Ginger Grimes	Draft supplemental briefing as requested by court	1.4	565.00	791.00
8/6/2021	Ginger Grimes	Conference with L. Ho re supplemental briefing	0.2	565.00	113.00
8/6/2021	Laura Ho	Correspondence w/ G. Grimes and S. Grimes re supplemental briefing	0.3	990.00	297.00
8/6/2021	Laura Ho	Phone call w/ G. Grimes re supplemental briefing	0.2	990.00	198.00
8/6/2021	Jacqueline Thompson	Respond to correspondence from G. Grimes re updating case file re settlement agreement	0.2	365.00	73.00
8/6/2021	Scott Grimes (stat)	Conference w/ G. Grimes re awards estiamtes and counts for supplemental briefing	0.7	390.00	273.00
8/6/2021	Scott Grimes (stat)	Revise award estimates; memo to G. Grimes re same	1.9	390.00	741.00
8/6/2021	Scott Grimes (stat)	Analyze class list and employment dates re awards estiamtes and counts for supplemental briefing; mutple emails w/ G. Grimes re same	2.7	390.00	1053.00
8/9/2021	Ginger Grimes	Research and draft supplemental briefing for preliminary approval	3.2	565.00	1808.00
8/9/2021	Ginger Grimes	Conference with L. Ho and S. Grimes re damages calculations for preliminary approval	0.6	565.00	339.00
8/9/2021	Ginger Grimes	Correspondence to M. Frandsen re revisions to settlement notices	0.1	565.00	56.50
8/9/2021	Laura Ho	Legal research re responding to court's questions and correspondence w/ G. Grimes re same	1.5	990.00	1485.00
8/9/2021	Laura Ho	Correspondence w/ S. Grimes and G. Grimes re damages estimates and settlement value	0.5	990.00	495.00
8/9/2021	Ginger Grimes	Conference with S. Grimes re damages estimates for preliminary approval	0.1	565.00	56.50
8/9/2021	Ginger Grimes	Confernce with L. Ho and S. Grimes (late) re exposure analysis for preliminary approval	0.2	565.00	113.00
8/9/2021	Laura Ho	Additional strategy w/ S. Grimes and G. Grimes re settlement value calculations and calculate same	2.0	990.00	1980.00
8/9/2021	Scott Grimes (stat)	Conferences w/ G. Grimes and L. Ho re damages calculations for prelinary approval briefing	1.0	390.00	390.00
8/9/2021	Scott Grimes (stat)	Revise damages estimaes	4.3	390.00	1677.00
8/10/2021	Ginger Grimes	Research and draft supplemental briefing for preliminary approval	2.7	565.00	1525.50
8/10/2021	Laura Ho	Review and respond to M. Frandsen email re issues for responding to judge's questions	0.8	990.00	792.00

Date	Professional	Narrative	Hours	Rate	Amount
8/10/2021	Ginger Grimes	Review correspondence from L. Ho and M. Frandsen re revisions to settlement notices	0.1	565.00	56.50
8/11/2021	Ginger Grimes	Research and draft supplemental briefing on preliminary approval	1.1	565.00	621.50
8/11/2021	Ginger Grimes	Correspondence to M. Frandsen re supplemental briefing	0.2	565.00	113.00
8/11/2021	Ginger Grimes	Research and draft supplemental briefing on preliminary approval	2.4	565.00	1356.00
8/12/2021	Ginger Grimes	Research and revise supplemental brief re preliminary approval	4.9	565.00	2768.50
8/12/2021	Laura Ho	Review and revise supplemental brief and correspondence w/ G. Grimes re same	2.0	990.00	1980.00
8/12/2021	Laura Ho	Review and revise class notice and correspondence w/ M. Frandsen re same	0.3	990.00	297.00
8/12/2021	Ginger Grimes	Conference with S. Grimes re settlement data	0.2	565.00	113.00
8/12/2021	Scott Grimes (stat)	Conference w/ G. Grimes re settlement data	0.2	390.00	78.00
8/12/2021	Scott Grimes (stat)	Analyze class data for supplement report to court	1.1	390.00	429.00
8/13/2021	Ginger Grimes	Research and revise supplemental brief re preliminary approval	1.3	565.00	734.50
8/13/2021	Jacqueline Thompson	Review correspondence from G. Grimes re supplemental briefing filing	0.1	365.00	36.50
8/13/2021	Laura Ho	Further edits to supplemental brief and correspondence w/ G. Grimes re edits	1.2	990.00	1188.00
8/13/2021	Scott Grimes (stat)	Emails to G. Grimes re risk calculation methodology for settlement, award estimates, award calculations	0.5	390.00	195.00
8/15/2021	Ginger Grimes	Review M. Frandsen draft section of supplemental brief on issues 4-6	0.1	565.00	56.50
8/16/2021	Ginger Grimes	Review L. Ho edits to supplemental brief in preparation for team call	0.1	565.00	56.50
8/16/2021	Ginger Grimes	Review Outten & Golden revisions to supplemental briefing in preparation for team call	0.1	565.00	56.50
8/16/2021	Ginger Grimes	Prepare for team call re supplemental briefing	0.2	565.00	113.00
8/16/2021	Ginger Grimes	Conference with L. Ho, M. Frandsen, D. Aaron re supplemental briefing	0.8	565.00	452.00
8/16/2021	Laura Ho	Review and revise Issues 4-6 section and correspondence w/ co-counsel re strategy	0.4	990.00	396.00
8/16/2021	Laura Ho	Phone call w/ G. Grimes and co-counsel re supplemental briefing	0.8	990.00	792.00
8/16/2021	Ginger Grimes	Revise draft of supplemental brief	3.3	565.00	1864.50
8/16/2021	Laura Ho	Additional edits to supplemental brief and correspondence w/ G. Grimes re edits	0.1	990.00	99.00
8/16/2021	Scott Grimes (stat)	Exchange email w/ L. Ho and re award estimates, damages estimates, settlement values and class data	0.5	390.00	195.00
8/17/2021	Ginger Grimes	Conference with L. Ho re supplemental briefing	0.1	565.00	56.50
8/17/2021	Ginger Grimes	Revise supplemental brief	0.8	565.00	452.00
8/17/2021	Laura Ho	Further revisions to supplemental brief, and correspondence w/ co-counsel re same	0.8	990.00	792.00
8/17/2021	Ginger Grimes	Draft L. Ho supplemental declaration in support of preliminary approval	1.0	565.00	565.00
8/17/2021	Jacqueline Thompson	Respond to correspondence from G. Grimes re Ho declaration and exhibits	0.6	365.00	219.00
8/17/2021	Ginger Grimes	Draft correspondence to opposing counsel re supplemental brief	0.2	565.00	113.00
8/17/2021	Ginger Grimes	Correspondence to J. Thompson and S. Kirkpatrick re legal cite checking supplemental brief	0.2	565.00	113.00
8/18/2021	Ginger Grimes	Correspondence with S. Kirkpatrick re cite checking supplemental brief	0.1	565.00	56.50
8/18/2021	Ginger Grimes	Revise Ho declaration in support of supplemental brief	0.2	565.00	113.00
8/18/2021	Jacqueline Thompson	Review correspondence from G. Grimes re supplemental preliminary approval filing and cite checking (1.3); exchange correspondence w/ S. Kirkpatrick re same (.1);	1.4	365.00	511.00
8/18/2021	Ginger Grimes	Correspondence to M. Frandsen re Seltz exposure justification for supplemental brief	0.2	565.00	113.00
8/18/2021	Laura Ho	Review/revise Ho declaration and correspondence w/ G. Grimes re edits	0.6	990.00	594.00
8/18/2021	Ginger Grimes	Revise Ho supplemental declaration	1.1	565.00	621.50
8/18/2021	Stuart Kirkpatrick	Legal cite-check and edit supplemental brief in support of motion for preliminary approval	3.8	350.00	1330.00
8/18/2021	Ginger Grimes	Finalize supplemental briefing papers	0.5	565.00	282.50
8/18/2021	Scott Grimes (stat)	Review damages calculations re inaccurate wage statement violations and email G. Grimes re same	0.3	390.00	117.00
8/19/2021	Ginger Grimes	Revise D. Aaron supplemental declaration	0.2	565.00	113.00

Date	Professional	Narrative	Hours	Rate	Amount
8/19/2021	Ginger Grimes	Revise supplemental brief in support of preliminary approval	0.3	565.00	169.50
8/19/2021	Ginger Grimes	Finalize supplemental briefing papers for filing	5.0	565.00	2825.00
8/19/2021	Ginger Grimes	Conferences with S. Grimes re class data issues related to preliminary approval	1.0	565.00	565.00
8/19/2021	Laura Ho	Correspondence w/ G. Grimes and S. Grimes re finalizing supplemental brief and edits	3.0	990.00	2970.00
8/19/2021	Scott Grimes (stat)	Revise award distribution estimates	3.9	390.00	1521.00
8/19/2021	Scott Grimes (stat)	Draft summary of damages exposur and settlement distribution	1.0	390.00	390.00
8/19/2021	Scott Grimes (stat)	Edit Ho declaration	0.5	390.00	195.00
8/19/2021	Scott Grimes (stat)	Review class list re class counts and emails w/ G. Grimes re same	0.5	390.00	195.00
8/19/2021	Stuart Kirkpatrick	Add string citation to supplemental brief, for G. Grimes	0.1	350.00	35.00
8/19/2021	Stuart Kirkpatrick	Add exhibit citations to Aaron declaration	0.2	350.00	70.00
8/19/2021	Stuart Kirkpatrick	Edit supplemental brief to add Aaron Declaration citations	0.2	350.00	70.00
8/19/2021	Stuart Kirkpatrick	Assemble Aaron declaration exhibits in preparation for efilng	0.8	350.00	280.00
8/19/2021	Stuart Kirkpatrick	Analyze and edit the Table of Authorities	0.4	350.00	140.00
8/19/2021	Stuart Kirkpatrick	Review updated L. Ho declaration, and edit supplemental brief citations and dollar totals linked to the declaration	0.3	350.00	105.00
8/19/2021	Stuart Kirkpatrick	Remove pages from two Aaron declaration exhibits, per G. Grimes instructions	0.1	350.00	35.00
8/19/2021	Stuart Kirkpatrick	Finalize supplemental brief filing pdf	0.1	350.00	35.00
8/19/2021	Stuart Kirkpatrick	Finalize Ho Declaration filing pdf	0.1	350.00	35.00
8/19/2021	Stuart Kirkpatrick	Efile Supplemental brief and supporting documents	0.4	350.00	140.00
8/19/2021	Jacqueline Thompson	Fact check supplemental brief and supporting documents, organize exhibits	5.0	365.00	1825.00
8/23/2021	Jacqueline Thompson	Respond to correspondence from G. Grimes re supplemental briefing (.2); respond to correspondence from L. Ho re hearing preparation (.3)	0.5	365.00	182.50
8/24/2021	Laura Ho	Review and respond to clerk memo re consent to magistrate	0.2	990.00	198.00
8/24/2021	Jacqueline Thompson	Review correspondence between S. Kirkpatrick and G. Chakraborty re hearing preparation	0.2	365.00	73.00
8/30/2021	Ginger Grimes	Review order granting preliminary approval	0.4	565.00	226.00
8/30/2021	Laura Ho	Review approval order and correspondence w/ G. Grimes re informing plaintiff	0.4	990.00	396.00
8/30/2021	Laura Ho	Correspondence w/ D. Aaron re implementing approval order	0.2	990.00	198.00
8/30/2021	Ginger Grimes	Conference with client D. Dixon re case update	0.2	565.00	113.00
8/30/2021	Jacqueline Thompson	Review order re preliminary approval (.1); review correspondence between G. Grimes and L. Ho re calendaring dates re preliminary approval (.2)	0.3	365.00	109.50
8/31/2021	Laura Ho	Phone call w/ G. Grimes re approval schedule	0.4	990.00	396.00
8/31/2021	Laura Ho	Review and respond to T. Petrides memo re notice schedule	0.2	990.00	198.00
8/31/2021	Laura Ho	Correspondence w/ CPT re notice schedule	0.2	990.00	198.00
8/31/2021	Ginger Grimes	Conference with L. Ho re class notice and final approval deadlines	0.4	565.00	226.00
8/31/2021	Stuart Kirkpatrick	Update settlement deadlines excel chart for G. Grimes	0.1	350.00	35.00
9/1/2021	Ginger Grimes	Correspondence to settlement class member M. Edlund re status of case	0.2	565.00	113.00
9/8/2021	Laura Ho	Correspondence w/ M. Wong re CAFA documents for CPT	0.2	990.00	198.00
9/14/2021	Ginger Grimes	Review correspondence from M. Frandsen re answers to questions from CPT	0.2	565.00	113.00
9/15/2021	Scott Grimes (stat)	Analyze class list re proposed corrections	0.3	390.00	117.00
9/17/2021	Laura Ho	Correspondence w/ S. Grimes re allocation data	0.2	990.00	198.00
9/17/2021	Laura Ho	Correspondence w/ D. Aaron re response date for notice	0.2	990.00	198.00
9/17/2021	Laura Ho	Review and respond re CPT allocation data corrections, including correspondence w/ S. Grimes and D. Aaron re same	0.6	990.00	594.00
9/17/2021	Scott Grimes (stat)	Review notice list re award calculations; memo to L. Ho re same	2.3	390.00	897.00
9/17/2021	Scott Grimes (stat)	Phone calls w/ L. Ho re class list analysis	0.4	390.00	156.00
9/20/2021	Laura Ho	Correspondence w/ M. Frandsen re opt out deadline	0.2	990.00	198.00
9/20/2021	Laura Ho	Correspondence w/ S. Grimes and M. Frandsen re corrected allocations	0.3	990.00	297.00
9/20/2021	Scott Grimes (stat)	Review and update class notice list; memo to L. Ho re same	0.3	390.00	117.00
9/21/2021	Laura Ho	Correspondence w/ J. Thompson re class notice	0.2	990.00	198.00
9/22/2021	Ginger Grimes	Correspondence to L. Ho re motion for attorneys' fees	0.1	565.00	56.50

Date	Professional	Narrative	Hours	Rate	Amount
9/22/2021	Laura Ho	Review and respond to CPT memo re whether managers know about claims	0.3	990.00	297.00
9/22/2021	Laura Ho	Correspondence w/ J. Thompson re notices and FAQs	0.2	990.00	198.00
9/22/2021	Laura Ho	Correspondence w/ G. Grimes, D. Aaron, M. Frandsen re fee petition	0.3	990.00	297.00
9/27/2021	Ginger Grimes	Correspondence to settlement class member about settlement	0.1	565.00	56.50
9/28/2021	Laura Ho	Phone call w/ co-counsel re fee motion strategy	0.5	990.00	495.00
9/28/2021	Ginger Grimes	Conference with L. Ho, M. Frandsen, and D. Aaron re preparing for motion for attorneys' fees	0.5	565.00	282.50
9/28/2021	Scott Grimes (stat)	Memo to G. Grimes re document database statistics	0.3	390.00	117.00
10/1/2021	Laura Ho	Correspondence w/ co-counsel re claims rate	0.20	990.00	198.00
10/1/2021	Laura Ho	Correspondence w/ J. Thompson re class members outside CA	0.30	990.00	297.00
10/1/2021	Laura Ho	Phone call w/ J. Thompson re class list	0.50	990.00	495.00
10/1/2021	Jacqueline Thompson	Review notice an settlement agreement re preparing case FAQ and case timeline (3.5); Review case files re correspondence from L. Ho re class members outside CA (.7); update prolaw re case related deadlines (.2); Correspondence w/ L. Ho re class members outside CA (.3); Phone call w/ L. Ho re class list (.5)	5.20	365.00	1898.00
10/4/2021	Laura Ho	Correspondence w/ CPT re updating settlement website	0.40	990.00	396.00
10/4/2021	Laura Ho	Correspondence w/ J. Thompson re settlement website corrections and FAQ	0.20	990.00	198.00
10/4/2021	Laura Ho	Phone call w/ J. Thompson re settlement website updates and FAQs for calls	0.20	990.00	198.00
10/4/2021	Laura Ho	Correspondence w/ co-counsel re claims rate	0.10	990.00	99.00
10/4/2021	Jacqueline Thompson	Review notice re finalizing FAQ (2.5); draft correspondence to L. Ho re FAQ and CPT website (.1); retrieve SAC, Settlement agreement, L. Ho declaration re preliminary approval and supplemental declaration re same and notice documents in respond to L. Ho request re CPT updating website (.3); review correspondence between L. Ho and CPT re updating website and weekly reports (.1); Phone call w/ L. Ho re settlement website updates and FAQs for calls (.2)	3.20	365.00	1168.00
10/5/2021	Laura Ho	Correspondence w/ D. Aaron re claims	0.20	990.00	198.00
10/5/2021	Laura Ho	Review and revise FAQs and correspondence w/ J. Thompson re same	0.60	990.00	594.00
10/5/2021	Laura Ho	Review and respond re T. Beaudais letter	0.30	990.00	297.00
10/5/2021	Jacqueline Thompson	Draft FAQ, (1.0); draft correspondence to L. Ho re FAQ (.1); Phone call w/ T. Baudais re settlement, review correspondence from T. Baudais re same (.3); draft correspondence to L. Ho re T. Baudais inquiry re repayment letter from Cushman (.2); exchange correspondence w/ L. Ho re outreach and FAQ (.2)	1.80	365.00	657.00
10/7/2021	Laura Ho	Work on fee motion and time records	2.50	990.00	2475.00
10/8/2021	Laura Ho	Review and respond re CPT notice report	0.20	990.00	198.00
10/8/2021	Laura Ho	Correspondence w/ M. Frandsen re their time records	0.10	990.00	99.00
10/8/2021	Jacqueline Thompson	Phone call w/ Judson and Jordan Cline and re settlement ();	0.50	365.00	182.50
10/11/2021	Ginger Grimes	Draft motion for attorneys fees and costs	2.30	565.00	1299.50
10/11/2021	Ginger Grimes	Correspondence to CPT re including J. Thompson on weekly report emails	0.10	565.00	56.50
10/11/2021	Ginger Grimes	Correspondence to CPT asking for declaration re settlement administration costs	0.20	565.00	113.00
10/11/2021	Laura Ho	Review and respond to CPT correspondence re opt ins, and correspondence w/ J. Thompson re same	0.20	990.00	198.00
10/11/2021	Laura Ho	Correspondence w/ G. Grimes re fee brief strategy	0.20	990.00	198.00
10/11/2021	Jacqueline Thompson	Respond to G. Grimes re contact w/ class members who responded to the notice (.1); exchange correspondence w/ G. Grimes re weekly reports (.1); review weekly report and correspondence between L. Ho re clarifications and CPT (.3); Compare claims received w/ appraiser and jr appraiser chart (.5); exchange correspondence w/ L. Ho re same (.1);	1.10	365.00	401.50
10/12/2021	Ginger Grimes	Research and draft motion for attorneys fees	1.90	565.00	1073.50
10/12/2021	Laura Ho	Correspondence w/ D. Aaron and J. Thompson re class member communications	0.30	990.00	297.00
10/12/2021	Laura Ho	Review and respond to M. Frandsen email re O&G and Shavitz time	0.20	990.00	198.00

Date	Professional	Narrative	Hours	Rate	Amount
10/12/2021	Jacqueline Thompson	Prepare class data in response to correspondence from L. Ho (.6); prepare phone script (.4); exchange correspondence w/ L. Ho re phone script (.2); review case file re Ho. supplemental declaration re preliminary approval re final approval preparation (.2);	1.40	365.00	511.00
10/13/2021	Ginger Grimes	Research and draft motion for attorneys' fees	2.40	565.00	1356.00
10/13/2021	Ginger Grimes	Correspondence to M. Frandsen re attorneys' fees declaration model	0.10	565.00	56.50
10/13/2021	Laura Ho	Correspondence w/ J. Thompson re M. Tindell	0.20	990.00	198.00
10/13/2021	Laura Ho	Correspondence w/ G. Grimes re fees and costs motion declarations	0.20	990.00	198.00
10/13/2021	Valdez, Damon	Teleconference w/ J. Thompson re class member communications	0.20	350.00	70.00
10/13/2021	Jacqueline Thompson	Review case file re M. Tidwell to respond to correspondence (.2); phone call w/ M. Tidwell re notice (.2); draft correspondence to L. Ho re phone call w/ M. Tidwell (.2); draft correspondence to M. Tidwell re notice (.1); Conference w/ D. Valdez re phone calls to case management conference (.2)	0.90	365.00	328.50
10/14/2021	Ginger Grimes	Research and drat motion or attorneys' fees	1.70	565.00	960.50
10/14/2021	Laura Ho	Correspondence w/ J. Thompson re class member responses	0.10	990.00	99.00
10/14/2021	Laura Ho	Correspondence w/ D. Aaron and G. Grimes re coding time and time records	0.30	990.00	297.00
10/14/2021	Laura Ho	Review and revise memorandum of points and authorities re fees and costs	1.00	990.00	990.00
10/14/2021	Jacqueline Thompson	Review class member phone calls (.2); prepare chart re tracking class member calls (.2); phone call w/ G. Chakraborty re class member phone calls (.3); class member communication and update tracking chart (1.0); exchange correspondence re w/ L. Ho re class member communications (.2)	1.90	365.00	693.50
10/14/2021	Gouri Chakraborty	Call with J. Thompson regarding class member calls	0.30	275.00	82.50
10/15/2021	Ginger Grimes	Review and revize billing records for billing judgment, work product, and privilege for motion for attorneys' fees	6.30	565.00	3559.50
10/15/2021	Jacqueline Thompson	Review weekly report re claims submitted (.2); review correspondence between G. Grimes and CPT re distribution of weekly report (.1); phone call w/ G. Chakraborty re phone call w/ (.2)	0.50	365.00	182.50
10/15/2021	Gouri Chakraborty	Class members calls re notice and claim form	0.80	275.00	220.00