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7 *and Collective Members, and Aggrieved*
8 *Employees*

9 *[Additional counsel on following page]*

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

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

15 Plaintiffs,

16 v.

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

20 Defendants.
21

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

**DECLARATION OF PAOLO C. MEIRELES
IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES AND COSTS**

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14 *Attorneys for Plaintiffs. Settlement Class*
15 *and Collective Members, and Aggrieved Employees*
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1 I, Paolo C. Meireles, declare as follows:

2 1. I am a Partner in the firm of the Shavitz Law Group, P.A. ("SLG") in Boca Raton, Florida.
3 SLG is an 8-attorney firm based in Boca Raton, Florida with an office in New York, New York that
4 focuses on representing workers as plaintiffs in employment-related matters, including claims based upon
5 individual and class-wide violations of state and federal wage and hour laws. Along with lawyers from
6 Goldstein, Borgen, Dardarian & Ho ("GBDH") and Outten & Golden LLP ("O&G"), SLG is counsel for
7 the Plaintiffs in the above-captioned matter.

8 2. I have been one of the lawyers primarily responsible for prosecuting Plaintiffs' claims on
9 behalf of the collective.

10 3. I am a member in good standing of the bars of the states of Florida, New Jersey, and New
11 York. My motion for *pro hac vice* is forthcoming, pending my receipt of a current certificate of good
12 standing to include with same.

13 4. I make these statements based on personal knowledge and would so testify if called as a
14 witness.

15 **Firm and Attorney Background**

16 5. For the past 20 years, SLG has focused on representing workers in wage and hour matters,
17 including claims based upon individual and class-wide violations of state and federal wage and hour laws
18 across the United States. My background and those of other SLG employees who worked on this matter
19 are below.

20 6. I became an Associate Attorney with SLG in 2012, and became a Partner in January
21 2018. After receiving my Juris Doctor degree from Fordham University in 2010, I was admitted to the
22 New Jersey and New York Bars in November 2010 and February 2011, respectively. I relocated to Florida
23 and became a member of the Florida Bar in September 2011. I am also admitted to the Second Circuit
24 Court of Appeals and the U.S. District Courts for the Southern District of Florida, the Middle District of
25 Florida, the Northern District of Florida, the Northern District of New York, the Southern District of New
26 York, the District of New Jersey, the Eastern District of Michigan, the Northern District of Ohio, and the
27 District of Colorado.

1 7. Gregg I. Shavitz, founder of the Shavitz Law Group, is a graduate of the University of
2 Miami School of Law with an undergraduate degree from Tufts University.

3 8. Mr. Shavitz is an experienced trial attorney and member of the bar of the U.S. District
4 Court for the Southern District of Florida and the Florida Bar since 1994, and is also admitted to U.S.
5 District Courts for the Middle and Northern Districts of Florida, the United States Eleventh Circuit Court
6 of Appeals, and United States Third Circuit Court of Appeals.

7 9. Additionally, Mr. Shavitz has lectured in the past at seminars sponsored by the Labor and
8 Employment Section of the Florida Bar, and has spoken at the Labor and Employment Section
9 Certification Review Seminar on two separate occasions as well as the Academy of Florida Trial Lawyers
10 Workhorse Seminars. Mr. Shavitz has also been awarded Florida Trend Magazine's Legal Elite for
11 various years including 2014, 2015, and 2020 in the area of Labor & Employment law; Florida Super
12 Lawyers – Super Lawyer, Employment & Labor – 2013-2020; Top Lawyer Up and Comer – Wage and
13 Hour law – 2004, 2006 and 2009; and South Florida Legal Guide – Top Lawyers List – 2009-2019, among
14 other awards and honors. Mr. Shavitz has also earned the distinction of Top Lawyer in Palm Beach
15 Illustrated – 2018-2020, and am a lifelong fellow of the Florida Bar Foundation.

16 10. Mr. Shavitz has held the highest AV Peer Review Rating from LexisNexis Martindale-
17 Hubbell for preeminent attorneys from 2000 to the present.

18 11. Attorney Christine M. Duignan has been an associate with SLG for over ten years. Ms.
19 Duignan is an employment attorney with nearly 30 years' experience. Ms. Duignan provides litigation
20 support in complex wage and hour actions arising under the Fair Labor Standards Act and Fed. R. Civ. P.
21 Rule 23, in a variety of jurisdictions nationally. Ms. Duignan has been a member of the Florida Bar since
22 1991 when she received her Juris Doctor degree with high honors, from University of Florida. She is
23 admitted to the Florida Bar, the U.S. District Court for the Southern District of Florida, the Eleventh
24 Circuit Court of Appeals and the U.S. Supreme Court.

25 12. Attorney Logan A. Pardell has been an Attorney with SLG since 2017. Since joining SLG,
26 Mr. Pardell has represented employees in in federal and state courts throughout the United States,
27 primarily litigating complex wage and hour class and collective cases. After receiving his Juris Doctor
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1 and Masters in Business Administration degrees, *cum laude*, from the University of Florida in 2015, Mr.
 2 Pardell was admitted to the Florida Bar in September 2015. Mr. Pardell is also admitted to the U.S.
 3 District Courts for the Southern District of Florida, Middle District of Florida and District of Colorado.

4 13. SLG has significant experience prosecuting wage and hour class and collective actions
 5 such as this one. In recent years, the firm has served or been appointed as class counsel or co-class counsel
 6 in the following cases, among others:

7 *Biscoe-Grey v. Sears Holding Corp.*, Case No. 09-81408-Civ-Marra / Johnson (S.D. Fla.)

8 *Cerrone v. KB Home Florida, LLC et al.*, Case No. 07-14402-Civ-Martinez (S.D. Fla.)

9 *Danley v. Office Depot, Inc., et al.*, Case No. 9:14-cv-81469-KAM (S.D. Fla.)

10 *Ellerd v. County of Los Angeles*, Case No. CV05-1211 SVW (CWX) (C.D. Cal.)

11 *Fiore v. Goodyear Tire & Rubber Co.*, Case No. 2:09-CV-843-FtM-29SPC (M.D. Fla.)

12 *Heitzenrater, et al. v. Officemax, Inc., et al.*, No. 12 Civ. 900S (W.D.N.Y.)

13 *Hosier v. Mattress Firm, Inc.*, Case No. 3:10-cv-00294-TJC-JRK (M.D. Fla.)

14 *Lewis v. Iowa College Acq. Corp. & Kaplan Higher Educ. Corp.*, Case No.
 15 08-61011-Civ-Jordan (S.D. Fla.)

16 *Mayfield v. Lennar Corp.*, Case No. 6:08-cv-426-Orl-31-DAB (M.D. Fla.)

17 *Nash v. CVS Caremark Corp.*, Case No. 09 Civ. 79 (D.R.I.)

18 *Patterson v. Palm Beach County School Board*, No. 07 Civ. 80240 (S.D. Fla.)

19 *Raley v. Kohl's Corporation, et al.*, Case No. 8:09-cv-2340 (M.D. Fla.)

20 *Robbins v. Abercrombie & Fitch Co.*, Case No. 15-cv-6187 (W.D.N.Y.)

21 *Roberts v. TJX Companies, Inc., et al.*, Case No. 13-cv-13142 (D. Mass)

22 *Romero v. Florida Power & Light Company*, Case No. 6:09-cv-1401-Orl-35-GJK (M.D. Fla.)

23 *Simpkins v. Pulte Home Corporation*, 6:08-cv-00130-PCF-DAB (M.D. Fla.)

24 *Snodgrass v. Bob Evans Farms, Inc.*, No. 12-cv-768 (S.D. Ohio)

25 *Stewart v. Prince Telecom, et al.*, Case No. 10-civ-4881 (S.D.N.Y.)

26 *Zolkos v. Scriptfleet, Inc.*, No. 12 Civ. 8230 (N.D. Ill.)

Time Spent on the Litigation

14. Plaintiffs' Counsel is requesting one-third of the settlement fund for attorneys' fees. In our experience, law firms that represent plaintiffs in employment matters like this matter typically charge their clients legal fees of at least one-third of their gross recoveries when they represent them on a contingency fee basis.

15. Moreover, Class Counsel's rates do not account for contingent risk and are well within the range of rates charged by similarly experienced and qualified attorneys practicing in this area, and are those charged other clients who pay for attorneys' fees on an hourly basis.

16. When SLG lawyers spend time on selected contingency matters, they do so at significant risk and opportunity cost for the firm. SLG frequently turns away additional cases, including hourly litigation matters and other contingency matters, in order to enable its attorneys to work on pending contingency matters, primarily (though not exclusively) class or collective actions.

17. Counsel's skill and experience was directly responsible for bringing about the positive settlement in the instant case and weigh in favor of granting the requested fees.

18. Due to the experience of its attorneys in representing workers in litigation of this type, SLG is adept at minimizing duplication of efforts and maximizing billing judgment. SLG makes every effort to have the work performed by the attorney or paralegal with the lowest hourly rate who is able to effectively perform each task.

19. To date, SLG has spent more than 402.2 hours investigating, researching, litigating, mediating, and settling this case. Attached as **Exhibit A** is a spreadsheet of SLG's detailed time records for this case listed in chronological order. This number includes approximately 375.9 attorney hours and 26.3 paralegal hours. To date, SLG's lodestar on the case is approximately \$201,690.00. However, SLG has also applied an across-the-board discount of 5%. SLG's final lodestar is thus \$ \$191,605.50. This is in addition to co-counsel GBDH's and O&G's lodestar incurred in this matter.

20. Specifically, SLG has spent the following number of hours on each phase of the litigation:

- a. Investigation through first mediation (11/28/17 to 7/31/18): 97.5 hours
- b. Mediation through stay of *Seltz & Dixon* (8/1/18 to 11/26/2018): 3.5 hours

c. Stay through second mediation (11/27/2018 to 6/27/2019): 64.0 hours

d. Post-second mediation through resuming of settlement discussions (6/28/2019 to 10/30/2020): 119.1 hours

e. Settlement discussions through third mediation (10/31/2020 – 3/11/2021): 101.3 hours

f. Third mediation through preliminary approval (3/12/2021 – 8/30/2021): 15.5 hours

g. Preliminary approval through present (8/21/2021-10/15/2021): 1.3 hours

21. The hours reported are reasonable for a case of this complexity and size and were compiled from contemporaneous time records maintained by each attorney and paralegal participating in the case.

22. SLG ordinarily and regularly bills legal time on an hourly fee basis by the tenth of an hour, based upon each attorney's standard hourly rate. Currently, SLG's complex litigation rates range from \$400 to \$700 per counsel's hour, \$150 per law clerk's hours, and \$150 per hour for paralegals and legal assistants. The rates of the SLG attorneys who worked on this matter are as follows:

Attorney	Hourly Rate	Law School Graduation Year	Hours	Total
Gregg Shavitz	\$ 700.00	1994	66.40	\$ 46,480.00
Paolo Meireles	\$ 550.00	2010	179.30	\$ 98,615.00
Christine Duignan	\$ 600.00	1991	3.30	\$ 1,980.00
Logan Pardell	\$ 400.00	2015	129.40	\$ 51,760.00
Paralegal	\$ 150.00	n/a	26.30	\$ 3,945.00

SLG's hourly rates have been approved by other federal courts. *Lawson, et al. v. Love's Travel Stops & Country Stores, Inc.*, No. 17 Civ. 1266, 2021 U.S. Dist. LEXIS 33983, at *16-17 (M.D. Pa. Feb. 24, 2021) (approving attorney fee request based on rates of \$750/hour, \$575/hour, and \$400/hour, for Gregg I. Shavitz, Paolo C. Meireles, and Logan A. Pardell, respectively); *see also Johnson v. Himage Sols., Inc.*, No. 20 Civ. 574, 2021 U.S. Dist. LEXIS 118410, at *22-23 (E.D. Mo. June 25, 2021); *Meo v. Lane Bryant, Inc.*, No. 18 Civ. 6360, 2020 WL 4047897, at *3 (E.D.N.Y. July 17, 2020) (finding SLG's

lodestar estimate and requested fees to be reasonable, after it reviewed “the billing rates for the respective attorneys” at SLG and “carefully reviewed the biographical information on each of the attorneys, along with their professional affiliations, publications and prior cases.”); *Slaughter v. Sykes Enters.*, No. 17 Civ. 02038, 2019 U.S. Dist. LEXIS 21767 (D. Colo. Feb. 11, 2019).

23. The requested attorneys’ fees are not based solely on time and effort already expended; they are also meant to compensate SLG for time that they will be required to spend administering the settlement in the future. In our experience, administering class settlements of this nature and size requires a substantial and ongoing commitment. SLG expects to respond to more inquiries after final approval.

24. SLG has reviewed their time records in this matter and has exercised billing judgment by closely reviewing the records and exercising billing judgment by eliminating vague or duplicative entries.

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

Costs Incurred in the Litigation

26. In addition to its fees, SLG has incurred approximately \$12,388.56 in out-of-pocket costs prosecuting this litigation, which were incidental and necessary to the representation of the class and which include investigation of Plaintiffs’ claims and travel to and from out-of-state mediation. SLG’s costs are summarized as follows:

Category	Cost Incurred
Travel – airline/car/mileage/taxi/gas	\$4,849.84
Meals	\$422.54
Special Masters/Mediators/Arbitrators:	\$6,350.00
216(b) Notice Administration Costs:	\$449.18
Court Fees/Filing Fees/Service Fees	\$317.00
SLG Total Costs:	\$12,388.56

* * *


Paolo C. Meireles

EXHIBIT A

Date	Rate	Working Lawyer	Hours	Amount	Explanation
12/5/17	\$ 700.00	GS - Gregg Shavitz	0.6	\$ 420.00	edits to tolling agreement
12/5/17	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Edits to tolling agreement.
12/7/17	\$ 550.00	PM - Paolo Meireles	0.6	\$ 330.00	Edits to data request letter.
12/8/17	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with co-counsel re: scope of tolling agreement.
12/8/17	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	team emails re tolling agreement
12/11/17	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt and review of fully executed tolling agreement
12/11/17	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Edits to data request letter.
4/22/18	\$ 700.00	GS - Gregg Shavitz	1.3	\$ 910.00	edits to liability statement to D
4/23/18	\$ 600.00	CD - Christine Duignan	1.0	\$ 600.00	Legal research (LEXIS) re admin exempt for appraisers
4/23/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	Prep for team call to strategize re: settlement
4/23/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	team call to strategize re: settlement
4/23/18	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	Conference with co-counsel re: preparing for mediation conference with opposing counsel .
4/23/18	\$ 550.00	PM - Paolo Meireles	0.8	\$ 440.00	Intake of Mark Goldberg and memo to file re: intake notes.
4/23/18	\$ 550.00	PM - Paolo Meireles	3.7	\$ 2,035.00	Data analysis and creation of damages spreadsheet. Email to opposing counsel re: questions about data produced to date.
4/23/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	telephone conference with co-counsel to prepare for mediation
4/24/18	\$ 600.00	CD - Christine Duignan	1.8	\$ 1,080.00	WL and on line research re admin exempt for appraisers
4/24/18	\$ 700.00	GS - Gregg Shavitz	7.6	\$ 5,320.00	travel from Florida to NY for settlement conference
4/24/18	\$ 550.00	PM - Paolo Meireles	1.6	\$ 880.00	Research re: salary basis satisfied by draw.
4/24/18	\$ 550.00	PM - Paolo Meireles	2.6	\$ 1,430.00	Analysis of supplemental data and continued creation of damage analysis for mediation purposes.

Date	Rate	Working Lawyer	Hours	Amount	Explanation
4/25/18	\$ 700.00	GS - Gregg Shavitz	1.6	\$ 1,120.00	Prep for meeting with D counsel and their representatives in NY
4/25/18	\$ 700.00	GS - Gregg Shavitz	2.0	\$ 1,400.00	meeting with D counsel and their representatives in NY
4/25/18	\$ 700.00	GS - Gregg Shavitz	7.8	\$ 5,460.00	travel home after pre-mediation meeting
5/21/18	\$ 150.00	AK - Abram Kreeger	0.4	\$ 60.00	Review emails (3) from Gregg Shavitz, review Cushman Wakefield website, sent 3 emails to Gregg Shavitz
5/21/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	team strategy call
5/21/18	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	telephone conference with team re next steps
6/18/18	\$ 150.00	re - Ryan Elias	1.5	\$ 225.00	Researched case law regarding first-filed rule in Florida and Washington.
6/19/18	\$ 150.00	re - Ryan Elias	4.0	\$ 600.00	Researched case law regarding first-filed doctrine.
6/21/18	\$ 150.00	re - Ryan Elias	3.5	\$ 525.00	Researched California case law on first-filed rule.
6/25/18	\$ 550.00	PM - Paolo Meireles	1.6	\$ 880.00	Editing and drafting complaint.
6/29/18	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	review and analysis of finalized and filed complaint
6/29/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	review and analysis of finalized and filed complaint
7/5/18	\$ 550.00	PM - Paolo Meireles	2.6	\$ 1,430.00	Additional data analysis to prepare for mediation. Drafted memo re: data points outstanding and needed for mediation.
7/20/18	\$ 700.00	GS - Gregg Shavitz	1.7	\$ 1,190.00	tracked edits to mediation statement
7/23/18	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Coordinating travel for mediation
7/26/18	\$ 550.00	PM - Paolo Meireles	3.5	\$ 1,925.00	Continued data analysis with new data provided by Opposing counsel and creation of damages analysis for mediation.
7/30/18	\$ 550.00	PM - Paolo Meireles	6.2	\$ 3,410.00	Travel from Boca Raton to mediation site.

Date	Rate	Working Lawyer	Hours	Amount	Explanation
7/30/18	\$ 550.00	PM - Paolo Meireles	2.8	\$ 1,540.00	Review of case file and mediation briefs to prepare for mediation.
7/30/18	\$ 700.00	GS - Gregg Shavitz	2.1	\$ 1,470.00	Prepared for mediation
7/30/18	\$ 550.00	PM - Paolo Meireles	7.0	\$ 3,850.00	Attending mediation.
7/30/18	\$ 700.00	GS - Gregg Shavitz	7.0	\$ 4,900.00	attended mediation
7/31/18	\$ 550.00	PM - Paolo Meireles	8.0	\$ 4,400.00	Travel from mediation to office.
7/31/18	\$ 700.00	GS - Gregg Shavitz	8.0	\$ 5,600.00	travel from mediation to home
9/13/18	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	review and analysis of answer and affirmative defenses
9/13/18	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	receipt and review of answer and affirmative defenses
10/12/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	review and analysis of meet and confer report
10/12/18	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	review of joint meet and confer report
10/15/18	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	review and analysis of minute order
10/16/18	\$ 150.00	er - Erma Rodriguez	0.4	\$ 60.00	Preparation of Calendaring of Minute order for Gregg and Paolo Meireles in ACT and Outlook
10/25/18	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with Goldberg re: case status update. Email to Goldberg re: case status update.
10/25/18	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Call with Goldman re: case status update.
11/18/18	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	prepared stipulation to extend stay
11/20/18	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with Outten & Golden re: edits to stipulation to stay and toll claims.
11/20/18	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	email exchange with co-counsel re: stipulation to extend stay
11/21/18	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	edits to stipulation to extend stay
11/28/18	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Review of email with documents requested from opposing counsel .

Date	Rate	Working Lawyer	Hours	Amount	Explanation
11/29/18	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	Call with opposing counsel re: outlining mediation production.
11/29/18	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Edits to email to opposing counsel re: mediation data request.
11/29/18	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	Call with opposing counsel re: outlining mediation production.
1/17/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email from opposing counsel re: new attorneys assigned to file.
1/19/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Email to Mark. G. re: case status update.
2/28/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with co-counsel re: coordinating conference re: preparing for mediation.
3/1/19	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Conference with co-counsel re: preparing for mediation.
3/1/19	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	team call on strategy and mediation prep
3/4/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email to opposing counsel re: status of producing updated data /documents for mediation.
3/14/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email to opposing counsel re: status of defendant's data production.
3/22/19	\$ 150.00	er - Erma Rodriguez	0.1	\$ 15.00	Preparation of Calendaring Mediation date in ACT and Outlook
4/2/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Edits to joint stipulation to stay case pending settlement.
4/2/19	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	review and analysis of stipulation to continue stay
6/2/19	\$ 550.00	PM - Paolo Meireles	1.1	\$ 605.00	Preliminary review of documents produced by defendants for settlement purposes.
6/3/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with co-counsel re: issues accessing defendants' production.
6/11/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Case status updates to clients.

Date	Rate	Working Lawyer	Hours	Amount	Explanation
6/13/19	\$ 550.00	PM - Paolo Meireles	1.9	\$ 1,045.00	Review and analysis of confidential document production
6/13/19	\$ 550.00	PM - Paolo Meireles	1.4	\$ 770.00	Edits to mediation statement.
6/14/19	\$ 550.00	PM - Paolo Meireles	3.8	\$ 2,090.00	Damages analysis and creation of damages model.
6/17/19	\$ 550.00	PM - Paolo Meireles	0.8	\$ 440.00	Team conference re: settlement strategy.
6/17/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Conference with Goldberg re: case status update.
6/17/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with Deirdre Aaron re: finalizing damages analysis.
6/17/19	\$ 550.00	PM - Paolo Meireles	8.3	\$ 4,565.00	Continued data analysis and creation of damages model for mediation.
6/17/19	\$ 700.00	GS - Gregg Shavitz	1.8	\$ 1,260.00	Review of mediation statement and damages to prepare for team call
6/17/19	\$ 700.00	GS - Gregg Shavitz	0.8	\$ 560.00	team call re mediation strategy
6/20/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with Laura ho re: edits to damages model.
6/20/19	\$ 550.00	PM - Paolo Meireles	3.4	\$ 1,870.00	Continued data analysis and creation of damages model.
6/23/19	\$ 550.00	PM - Paolo Meireles	0.7	\$ 385.00	Conference with team re: preparing for mediation.
6/24/19	\$ 700.00	GS - Gregg Shavitz	0.4	\$ 280.00	team call for mediation prep
6/25/19	\$ 550.00	PM - Paolo Meireles	4.7	\$ 2,585.00	Continued damages analysis
6/25/19	\$ 600.00	CD - Christine Duignan	0.5	\$ 300.00	review data and damages calculations with Paolo Meireles
6/26/19	\$ 550.00	PM - Paolo Meireles	3.7	\$ 2,035.00	Review and analysis of case file to prepare for mediation.
6/26/19	\$ 550.00	PM - Paolo Meireles	4.6	\$ 2,530.00	Continued damages analysis.
6/26/19	\$ 550.00	PM - Paolo Meireles	11.4	\$ 6,270.00	Travel from boca to San Francisco for mediation.
6/26/19	\$ 700.00	GS - Gregg Shavitz	0.7	\$ 490.00	telephone conference with Paolo Meireles re: mediation
6/26/19	\$ 550.00	PM - Paolo Meireles	0.7	\$ 385.00	telephone conference with Gregg Shavitz re: mediation
6/27/19	\$ 550.00	PM - Paolo Meireles	5.5	\$ 3,025.00	Attending mediation.
6/27/19	\$ 700.00	GS - Gregg Shavitz	2.9	\$ 2,030.00	multiple telephone conferences/emails re updates and recap on mediation

Date	Rate	Working Lawyer	Hours	Amount	Explanation
6/27/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	telephone conference with Gregg Shavitz re recap of mediation
6/28/19	\$ 550.00	PM - Paolo Meireles	10.3	\$ 5,665.00	Travel from mediation in California to boca Raton.
7/1/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	review and analysis of joint status report following mediation
7/1/19	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	review of finalized joint status report
7/15/19	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	Review and edits to draft stipulated order to lift stay and continue discovery.
7/15/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with co-counsel re: discovery plan edits.
7/15/19	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	team emails re discovery plan
7/18/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Edits to proposed scheduling order.
7/18/19	\$ 550.00	PM - Paolo Meireles	0.6	\$ 330.00	Conference with opposing counsel re: edits to proposed scheduling order.
7/22/19	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Conference with opposing counsel re: discovery conferral.
7/22/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Edits to joint stipulation amending schedule
7/23/19	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	Edits to joint discovery stipulation.
7/23/19	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Further edits to draft discovery stipulation.
7/24/19	\$ 150.00	er - Erma Rodriguez	0.1	\$ 15.00	Preparation of Calendaring telephone call with judge in act
7/24/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Conference with co-counsel re: preparing for call with opposing counsel to discuss discovery issues.
7/24/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Conference with opposing counsel re: discovery structure and case schedule.
7/24/19	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Further edits re: joint letter outlining discovery disputes.

Date	Rate	Working Lawyer	Hours	Amount	Explanation
8/9/19	\$ 400.00	lp - Logan Pardell	0.6	\$ 240.00	review and analysis of amended discovery request
8/9/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	review and analysis of plaintiffs amended discovery requests
8/12/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Edits to tolling agreement.
8/13/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Drafting case status update to clients.
8/14/19	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Preparation of saved and calendared discovery
8/14/19	\$ 150.00	RC - Rita Claude	0.3	\$ 45.00	Emailed case update to clients and update files
8/14/19	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	Edits to initial disclosures.
8/14/19	\$ 700.00	GS - Gregg Shavitz	0.3	\$ 210.00	review of initial disclosures
8/14/19	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of initial disclosures and team emails re same
8/20/19	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	Review of Bursey complaint to prepare for team conference re: same.
8/20/19	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Conference with co-counsel re: discovery and 216(b) strategy.
8/20/19	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	team call re 216b and discovery
9/13/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	review and analysis of discovery responses
9/18/19	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	Review and analysis of second tolling agreement
9/21/19	\$ 400.00	lp - Logan Pardell	0.4	\$ 160.00	review and analysis of discovery response and email from Paolo Meireles re same
9/23/19	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt and review of fully executed second tolling agreement
9/28/19	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Review and edits to letter to opposing counsel re: compelling production of names and contact information of putative member
10/3/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email to opposing counsel re: seeking leave to add new defendants.

Date	Rate	Working Lawyer	Hours	Amount	Explanation
10/4/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Receipt of email re: PAGA/amended complaint
10/7/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Receipt of email from D re: need for proposed amended complaint
10/8/19	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Receipt of email from O&G re: proposed amended complaint and review of same
10/8/19	\$ 700.00	GS - Gregg Shavitz	0.3	\$ 210.00	Review of proposed amended complaint and emails with OC re same
10/10/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Edits to stipulation to file amended complaint.
10/10/19	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	review and analysis of stipulation to file amended complaint
10/12/19	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with logan re: preparing pro hac for Gregg.
10/12/19	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	email exchange with Paolo Meireles re: phv applications
10/25/19	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	receipt and review of consent motion of extension of time to respond to complaint
10/29/19	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	receipt and review of corporate disclosure statement
11/1/19	\$ 550.00	PM - Paolo Meireles	0.4	\$ 220.00	additional data analysis.
11/6/19	\$ 550.00	PM - Paolo Meireles	2.6	\$ 1,430.00	Began review and analysis of documents produced by Defendants
11/9/19	\$ 550.00	PM - Paolo Meireles	3.1	\$ 1,705.00	Continued review and analysis of documents produced by Defendants
11/15/19	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of form pro hac vice application to provide direction to Erma Rodriguez to prepare
11/18/19	\$ 150.00	er - Erma Rodriguez	0.7	\$ 105.00	Preparation of Application for Pro Hac Vice for Gregg
11/18/19	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis and edit to phv admission for Gregg Shavitz and email exchange with Erma Rodriguez re: same

Date	Rate	Working Lawyer	Hours	Amount	Explanation
11/21/19	\$ 550.00	PM - Paolo Meireles	0.6	\$ 330.00	Edits to witness letter.
11/22/19	\$ 150.00	er - Erma Rodriguez	0.4	\$ 60.00	Preparation of notice of appearance for Gregg
11/25/19	\$ 150.00	er - Erma Rodriguez	0.4	\$ 60.00	Preparation, service and filing of Dkt. #:33 Docket Text: NOTICE of Appearance by Gregg I Shavitz
12/19/19	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team call re: discovery status and motion for conditional cert
12/19/19	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	conference with co counsel re: 216(b) strategy.
1/7/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	emails with Outten & golden re: preparing 216(b) motion.
1/7/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	team emails re 216b motion
1/8/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	team call re: next steps (including filing 216b)
1/8/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Conference with co-counsel re: 216(b) strategy.
1/8/20	\$ 400.00	lp - Logan Pardell	3.1	\$ 1,240.00	review and analysis of case file (including mediation statement/notes, relevant pleadings and discovery) to prepare for team
1/13/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Emails with opposing counsel re: 216(b) strategy.
1/13/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email from opposing counsel re: coordinating conference to discuss settlement.
1/14/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:34
1/21/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of documents produced and email exchange with Erma Rodriguez re: saving productions
2/11/20	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	Review of draft 216b motion and decs and receipt of email from LP advising he would do edits first
2/14/20	\$ 400.00	lp - Logan Pardell	1.2	\$ 480.00	review and analysis and edits of declarations drafted by co-counsel iso motion for conditional cert

Date	Rate	Working Lawyer	Hours	Amount	Explanation
2/16/20	\$ 400.00	lp - Logan Pardell	2.9	\$ 1,160.00	review and analysis and edit to motion for conditional certification
2/20/20	\$ 550.00	PM - Paolo Meireles	4.2	\$ 2,310.00	Edits to 216(b) motion and supporting declarations.
2/21/20	\$ 700.00	GS - Gregg Shavitz	1.3	\$ 910.00	review and analysis of 216 motion and exhibits
2/24/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:35 ?
2/24/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of docket and email exchange with Paolo Meireles and Erma Rodriguez re: appropriate calendaring of same
2/25/20	\$ 150.00	er - Erma Rodriguez	0.4	\$ 60.00	Preparation of calendaring deadlines in act and outlook
2/27/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	receipt and review of email from co-counsel re: mediation and motion for conditional cert
2/27/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	team emails re mediation and 216b
2/27/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	email exchange with team re mediation and 216b
2/28/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Review of CO case docket
2/28/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email from O&G re: status of CO case
2/29/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of tolling agreement and team emails re: same
2/29/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Edits to third tolling agreement.
3/4/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt and review of fully executed third tolling agreement
3/5/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Emails re: outreach to OC re: settlement
3/25/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email from opposing counsel re: coordaining mediation.
4/10/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	email exchange with co-counsel re: settlement discussions

Date	Rate	Working Lawyer	Hours	Amount	Explanation
4/15/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	email exchange with co-counsel re: Colorado case status and impact on our case
4/17/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #36
4/17/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	review and analysis of proposed scheduling order and email exchange with logan Pardell re same
4/17/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	email exchange with Paolo Meireles re: proposed scheduling order
4/22/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	review and analysis of orders re: conditional cert and motion for summary judgment in CO case and team emails re: same
5/8/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	emails with opposing counsel re: settlement discussions.
5/8/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	emails re settlement discussions
5/19/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	email exchange with co-counsel re: case update
5/27/20	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Review of and edits to case management report.
5/28/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	receipt and review of joint motion to align deadlines and email exchange with co-counsel re: same
6/1/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #37
6/3/20	\$ 150.00	er - Erma Rodriguez	0.6	\$ 90.00	Initial receipt and docketing of minute order
6/8/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and calendaring of motion deadlines
6/8/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	prep for team call re: discovery
6/8/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	team call re: next steps in discovery
6/16/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	receipt and review of emails re: status of discovery
6/26/20	\$ 150.00	RC - Rita Claude	0.3	\$ 45.00	Initial receipt of clients info create new ACT contacts

Date	Rate	Working Lawyer	Hours	Amount	Explanation
6/29/20	\$ 150.00	RC - Rita Claude	0.3	\$ 45.00	Initial receipt of update preparation of list, email to clients and update files
7/6/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	receipt and review of emails from opposing counsel and co-counsel re: confidentiality of exhibit iso motion for conditional cert
7/6/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	email to co-counsel re: latest production
7/8/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	receipt and review of email from opposing counsel re: status of production
7/9/20	\$ 150.00	er - Erma Rodriguez	0.4	\$ 60.00	Initial receipt and docketing of ¶ 216(b) motion
7/9/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of motion to seal
7/9/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt, calendaring, and docketing of minute order
7/9/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	team emails and emails with opposing counsel re: consenting to 216b notice
7/9/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	team emails re 216 discussion
7/9/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	team emails re: 216b
7/10/20	\$ 700.00	GS - Gregg Shavitz	0.3	\$ 210.00	Review of finalized and filed 216b motion
7/10/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of sealed exhibit
7/13/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	Email exchange with co-counsel re: correspondence with named plaintiff
7/13/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:41 ¶
7/14/20	\$ 150.00	er - Erma Rodriguez	0.3	\$ 45.00	Initial receipt and docketing of minute order
7/16/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	receipt and review of production and email exchange with Erma Rodriguez re: organizing same
7/21/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:42

Date	Rate	Working Lawyer	Hours	Amount	Explanation
7/21/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Receipt of email from opposing counsel: re status of supplemental production
7/21/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:43
7/22/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of minute order
7/23/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:44
7/23/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Review and analysis of discovery requests
7/23/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Receipt and review of emails from co-counsel and opposing counsel re: supplemental production
7/24/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Receipt of email from opposing counsel re: supplemental production
7/24/20	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	receipt and review of supplemental production and emails with Erma Rodriguez re same
7/26/20	\$ 550.00	PM - Paolo Meireles	2.5	\$ 1,375.00	Review and analysis of supplemental document production
7/28/20	\$ 550.00	PM - Paolo Meireles	1.6	\$ 880.00	Continued review and analysis of supplemental document production
7/29/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email from co-counsel re: stip to 216v
7/31/20	\$ 400.00	lp - Logan Pardell	1.2	\$ 480.00	review and analysis of notice and ctj and emails from opposing counsel and team emails re: same
7/31/20	\$ 550.00	PM - Paolo Meireles	0.7	\$ 385.00	Edits to notice materials.
7/31/20	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	review and analysis of notice material edits and team emails re same
8/3/20	\$ 700.00	GS - Gregg Shavitz	0.3	\$ 210.00	Emails re: notice materials negotiation with D counsel
8/3/20	\$ 400.00	lp - Logan Pardell	0.4	\$ 160.00	team emails re: notice and ctj forms and next steps

Date	Rate	Working Lawyer	Hours	Amount	Explanation
8/3/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	receipt and review of email from opposing counsel re: discovery update
8/3/20	\$ 400.00	lp - Logan Pardell	2.6	\$ 1,040.00	Continued review and analysis of Defendant's document production
8/3/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	emails with co-counsel re: edits to the notice materials.
8/5/20	\$ 400.00	lp - Logan Pardell	1.9	\$ 760.00	prepared joint stipulation re: notice
8/5/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of edits to stipulation and emails with co-counsel re: same
8/5/20	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	Edits to stipulation.
8/5/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	review and analysis of edits to stipulation re notice
8/6/20	\$ 400.00	lp - Logan Pardell	2.4	\$ 960.00	Continued review and analysis of Defendant's document production
8/6/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:45 ?
8/10/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:46 ?
8/11/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Receipt of updated wage data; preliminary review and emails with Erma Rodriguez re: same
8/14/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email from co-counsel re: settlement admins
8/15/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails with co-counsel re: potential administrators
8/17/20	\$ 150.00	RC - Rita Claude	0.3	\$ 45.00	Preparation of email list sent case update and update files
8/18/20	\$ 150.00	RC - Rita Claude	0.3	\$ 45.00	Preparation of list and send case update to clients and update files
8/18/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	email exchange with opposing counsel and co-counsel re: discovery responses
8/21/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	receipt and review of email from opposing counsel re: class list

Date	Rate	Working Lawyer	Hours	Amount	Explanation
8/21/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Emails from admin and co-counsel re: coordinating notice mailing/admin
9/3/20	\$ 150.00	er - Erma Rodriguez	0.3	\$ 45.00	Preparation of calendaring deadlines in ACT and outlook
9/3/20	\$ 550.00	PM - Paolo Meireles	0.8	\$ 440.00	Review and analysis of list of potential custodians and review of discovery responses and document production to evaluate same
9/4/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	Receipt of confirmation of notice mailing and emails re email notice
9/4/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Receipt of email from admin confirming notice mailing, email notice and coordinated calendaring of same
9/8/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of meet and confer letter from opposing counsel
9/8/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	team emails re: next steps on case
9/8/20	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	telephone conference with co-counsel re: data for demand
9/8/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	team emails re case strategy
9/8/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	email exchange with co-counsel re next steps
9/9/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	Review of D's interrogatory response and emails from co-counsel and D re: deficiencies
9/9/20	\$ 400.00	lp - Logan Pardell	0.6	\$ 240.00	receipt and review of responses to discovery in Dixon
9/10/20	\$ 400.00	lp - Logan Pardell	3.8	\$ 1,520.00	began preparing damages analysis
9/10/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	Emails with Erma Rodriguez re: coordinating receipt of discovery responses/production
9/10/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	Receipt and review of emails from O&G re relevant dates for SOLs for damages model
9/10/20	\$ 550.00	PM - Paolo Meireles	1.9	\$ 1,045.00	review and analysis of data.

Date	Rate	Working Lawyer	Hours	Amount	Explanation
9/11/20	\$ 400.00	lp - Logan Pardell	4.6	\$ 1,840.00	continued preparing damages model
9/11/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Email to Gregg Shavitz re update to damages model
9/11/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Emails with Logan re: status of damages model
9/12/20	\$ 400.00	lp - Logan Pardell	5.1	\$ 2,040.00	continued preparing damages model
9/12/20	\$ 700.00	GS - Gregg Shavitz	1.0	\$ 700.00	Preliminary review of damages model prepared by Logan
9/14/20	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	telephone conference with Paolo Meireles to explain damages
9/14/20	\$ 550.00	PM - Paolo Meireles	1.3	\$ 715.00	Review and analysis of data and damages model, call with logan re: same.
9/16/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	team emails re: damages model
9/16/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	team emails regarding damages
9/16/20	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	review and analysis of damages model and emails re same
9/20/21	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email from OC re ESI custodians
9/21/20	\$ 400.00	lp - Logan Pardell	2.1	\$ 840.00	continued preparing damages model and team emails re: same
9/23/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email from O&G re status of preparing demand
9/23/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	email exchange with team re: calculation of commissions overtime
9/23/20	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	conducted research re: how to calculate commissions overtime
9/23/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	team emails re: damages model
9/23/20	\$ 400.00	lp - Logan Pardell	4.3	\$ 1,720.00	continued preparing damages model
9/24/20	\$ 400.00	lp - Logan Pardell	0.8	\$ 320.00	updated damages model and email exchange with team re: same

Date	Rate	Working Lawyer	Hours	Amount	Explanation
9/24/20	\$ 550.00	PM - Paolo Meireles	1.1	\$ 605.00	conference with team re: considering settlement position.
9/24/20	\$ 400.00	lp - Logan Pardell	1.1	\$ 440.00	team call re: damages model
9/25/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	Emails with O&G re: coordinating call re demand
9/25/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	Conference with Outten & Golden re settlement demand consideration .
9/26/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Emails with LP re: weekly reports
9/26/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Emails with Paolo re weekly reports
9/28/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:47 ?
9/28/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:48 ?
9/29/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:49 ?
9/29/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	email exchange with co-counsel re: damages model
9/29/20	\$ 400.00	lp - Logan Pardell	3.7	\$ 1,480.00	prepared comprehensive damages model for sr appraisers
9/30/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	email exchange with Paolo Meireles and co-counsel re: damages
9/30/20	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	emails with logan Pardell and team re explanation of damages calculations
10/1/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:50 ?
10/2/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Emails with LP re: weekly reports
10/2/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Emails with Paolo re weekly reports
10/6/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:51 ?
10/7/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:52 ?
10/7/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	Team emails re coordinating demand and review of damages model

Date	Rate	Working Lawyer	Hours	Amount	Explanation
10/8/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of minute order
10/8/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:53 ?
10/13/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:54 ?
10/13/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:55 ?
10/13/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Email exchange with O&G re potential mediators and coordinating mediation
10/14/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Continued email exchange with O&G re potential mediators and coordinating mediation
10/14/20	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	Receipt and review of emails re reminder postcard and review of version to be sent by admin
10/14/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Review of reminder notice and emails from admin and OC re same
10/15/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:56 ?
10/17/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Coordination of internal mediation scheduling
10/19/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email confirming distribution of reminder notice
10/19/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email to rottman re: coordinating mediation.
10/22/20	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Coordination of mediation scheduling
11/2/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of email from O&G re CO settlement
11/2/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:57 ?
11/2/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:58 ?
11/2/20	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	review and analysis of proposed stipulation re: notice and email exchange re: same
11/3/20	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Review of draft stip edits from D counsel and emails re same

Date	Rate	Working Lawyer	Hours	Amount	Explanation
11/11/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	Receipt and review of order granting joint motion to stay and email exchange with Erma re how it affects calendaring of the case
11/11/20	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt and review of order granting motion to stay
12/2/20	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:59 ?
12/23/20	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Receipt and review of invoice from administrator and email with Erma re same
12/27/20	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	review and analysis of weekly reports
12/30/20	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	Review of prior settlement agreement in CO and email from O&G re same
12/30/20	\$ 550.00	PM - Paolo Meireles	0.8	\$ 440.00	Review and analysis of CO settlement with Cushman and email re same from co-counsel
1/11/21	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt and review of email from co-counsel re prior settlement and context of our case
1/11/21	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Receipt of email from co-counsel re: other settlement in CO
2/4/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team call re: mediation prep
2/4/21	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	team call re mediation prep
2/4/21	\$ 550.00	PM - Paolo Meireles	0.8	\$ 440.00	Receipt of email from Molly re: previous damages model and review of same to compare to our current model
2/11/21	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Receipt of emails re: coordinating mediation
2/13/21	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	Coordinate team call re mediation strategy
2/22/21	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Email to Scott Grimes re: data
2/22/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team call re: mediation data
2/22/21	\$ 400.00	lp - Logan Pardell	0.8	\$ 320.00	continued damages analysis
2/22/21	\$ 400.00	lp - Logan Pardell	3.4	\$ 1,360.00	Review and analysis of document production for mediation statement

Date	Rate	Working Lawyer	Hours	Amount	Explanation
2/22/21	\$ 400.00	lp - Logan Pardell	1.6	\$ 640.00	review and analysis and edit of mediation statement and email exchange with team re same
2/22/21	\$ 700.00	GS - Gregg Shavitz	0.8	\$ 560.00	Review of mediation statement and edits from LP to same
2/22/21	\$ 550.00	PM - Paolo Meireles	0.9	\$ 495.00	Review and analysis of mediation statement and emails re edits to same
2/24/21	\$ 400.00	lp - Logan Pardell	0.9	\$ 360.00	continued data analysis in prep for mediation
2/24/21	\$ 400.00	lp - Logan Pardell	2.5	\$ 1,000.00	began updating comprehensive data analysis for mediation
2/25/21	\$ 550.00	PM - Paolo Meireles	1.5	\$ 825.00	Review and analysis of mediation statement
2/25/21	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	Emails with team to coordinate call re data
2/25/21	\$ 400.00	lp - Logan Pardell	1.4	\$ 560.00	Continued review and analysis of document production to prepare for mediation
2/25/21	\$ 400.00	lp - Logan Pardell	0.7	\$ 280.00	Receipt and review of updated mediation statement and team emails re same
2/26/21	\$ 700.00	GS - Gregg Shavitz	0.1	\$ 70.00	Team emails re mediation statement
2/26/21	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Email re mediation statement
2/26/21	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Emails with team re mediation statement
2/26/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team strategy call re: mediation
2/26/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	telephone conference with opposing counsel re: mediation
2/26/21	\$ 550.00	PM - Paolo Meireles	2.3	\$ 1,265.00	conference with logan re: data analysis and analysis of same.
2/26/21	\$ 400.00	lp - Logan Pardell	8.4	\$ 3,360.00	continued damages model in advance of mediation
2/26/21	\$ 550.00	PM - Paolo Meireles	0.5	\$ 275.00	telephone conference with opposing counsel re: mediation prep

Date	Rate	Working Lawyer	Hours	Amount	Explanation
2/28/21	\$ 400.00	lp - Logan Pardell	2.3	\$ 920.00	continued preparing damages model
2/28/21	\$ 400.00	lp - Logan Pardell	2.9	\$ 1,160.00	continued review and analysis of document production
3/1/21	\$ 400.00	lp - Logan Pardell	3.9	\$ 1,560.00	continued preparing damages model
3/1/21	\$ 400.00	lp - Logan Pardell	1.0	\$ 400.00	team call re: mediation and damages
3/4/21	\$ 400.00	lp - Logan Pardell	4.2	\$ 1,680.00	continued damages analysis
3/4/21	\$ 400.00	lp - Logan Pardell	0.6	\$ 240.00	telephone conference with co-counsel re: data
3/5/21	\$ 400.00	lp - Logan Pardell	2.3	\$ 920.00	updated damages model
3/5/21	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	team emails re: term sheet and damages model
3/8/21	\$ 400.00	lp - Logan Pardell	2.7	\$ 1,080.00	continued preparing damages model
3/9/21	\$ 150.00	er - Erma Rodriguez	0.3	\$ 45.00	Preparation of uploading of documents
3/9/21	\$ 400.00	lp - Logan Pardell	0.9	\$ 360.00	team call re: data analysis
3/9/21	\$ 400.00	lp - Logan Pardell	4.6	\$ 1,840.00	continued preparing damages model
3/10/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team call re: mediation prep
3/10/21	\$ 400.00	lp - Logan Pardell	2.8	\$ 1,120.00	Continued review and analysis of document production in preparation for mediation
3/11/21	\$ 400.00	lp - Logan Pardell	1.0	\$ 400.00	team call re: mediation prep to determine demand
3/11/21	\$ 400.00	lp - Logan Pardell	1.2	\$ 480.00	telephone conference with Paolo Meireles to prepare for mediation
3/11/21	\$ 400.00	lp - Logan Pardell	1.9	\$ 760.00	continued updating damages model in preparation for mediation
3/11/21	\$ 550.00	PM - Paolo Meireles	5.5	\$ 3,025.00	Review case file and conferences with Logan and Deirdre to prepare for mediation.
3/11/21	\$ 550.00	PM - Paolo Meireles	13.0	\$ 7,150.00	attending mediation.
3/11/21	\$ 400.00	lp - Logan Pardell	13.0	\$ 5,200.00	attended mediation
3/11/21	\$ 700.00	GS - Gregg Shavitz	3.2	\$ 2,240.00	telephone conferences throughout mediation to receive updates and provide input

Date	Rate	Working Lawyer	Hours	Amount	Explanation
3/15/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	continued updating damages model and email exchange with co-counsel re: same
3/15/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team call re: settlement strategy
3/16/21	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	team emails re; potential settlement allocation and confirming calculations
3/16/21	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	review and analysis of model prepared by co-counsel re: allocation and team emails r
3/16/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	team call re: allocation formula
3/31/21	\$ 150.00	er - Erma Rodriguez	0.3	\$ 45.00	Initial receipt and docketing of Dkt. #:00 ?
3/31/21	\$ 150.00	er - Erma Rodriguez	0.3	\$ 45.00	Initial receipt and docketing of minute order
4/5/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and calendaring of status report deadline
4/6/21	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	conference with Deirdre re: settlement negotiation strategy.
4/8/21	\$ 400.00	lp - Logan Pardell	0.8	\$ 320.00	assist co-counsel in determining finalized workweek numbers for settlement agreement
4/9/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	email exchange with co-counsel re: list of opt-ins and weeks at issue and develop excel model for settlement agreement purpose
4/15/21	\$ 550.00	PM - Paolo Meireles	1.6	\$ 880.00	review of draft settlement documents.
4/15/21	\$ 700.00	GS - Gregg Shavitz	1.2	\$ 840.00	review and analysis of settlement documents
4/29/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:01 ?
5/28/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:02 ?
6/9/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of minute order
6/15/21	\$ 550.00	PM - Paolo Meireles	0.2	\$ 110.00	team emails re next steps in settlement and approval

Date	Rate	Working Lawyer	Hours	Amount	Explanation
6/15/21	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	team emails re: finalizing settlement
6/18/21	\$ 550.00	PM - Paolo Meireles	1.8	\$ 990.00	Began preparing declaration ISO motion for approval
6/20/21	\$ 400.00	lp - Logan Pardell	0.5	\$ 200.00	Review of declaration of GIS in support of approval
6/22/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:103 ?
6/23/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of minute order
6/24/21	\$ 700.00	GS - Gregg Shavitz	0.5	\$ 350.00	Review of GIS dec
6/28/21	\$ 150.00	er - Erma Rodriguez	0.5	\$ 75.00	Preparation of attorney admission forms
6/29/21	\$ 550.00	PM - Paolo Meireles	0.3	\$ 165.00	team emails re approval
6/29/21	\$ 700.00	GS - Gregg Shavitz	0.2	\$ 140.00	emails re motion for approval
6/29/21	\$ 400.00	lp - Logan Pardell	0.2	\$ 80.00	team emails re motion for approval and dec
7/1/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:104 ?
7/6/21	\$ 150.00	er - Erma Rodriguez	0.5	\$ 75.00	Preparation, service and filing of Dkt. #:121
7/8/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:122 ?
7/15/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:123 ?
7/30/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:105 ?
8/5/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of minute order
8/5/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:126 ?
8/5/21	\$ 150.00	er - Erma Rodriguez	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:127
8/23/21	\$ 150.00	RC - Rita Claude	0.1	\$ 15.00	Initial receipt and docketing of Dkt. #:130
8/23/21	\$ 150.00	RC - Rita Claude	0.2	\$ 30.00	Initial receipt and docketing of Dkt. #:129
8/23/21	\$ 150.00	RC - Rita Claude	0.2	\$ 30.00	Initial receipt and docketing of Dkt. # 128

Date	Rate	Working Lawyer	Hours	Amount	Explanation
8/26/21	\$ 150.00	RC - Rita Claude	0.1	\$ 15.00	Initial receipt and docketing of Dkt. # 131: Consent and Declaration to Proceed Before a US Magistrate Judge by Ryan Seltz
8/30/21	\$ 400.00	lp - Logan Pardell	0.3	\$ 120.00	review and analysis of order granting preliminary approval
9/2/21	\$ 150.00	RC - Rita Claude	0.2	\$ 30.00	Calendared Motion deadlines
9/24/21	\$ 550.00	PM - Paolo Meireles	0.1	\$ 55.00	Email exchange with O&G re fee application
10/6/21	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Email exchange with O&G re status of fee application support
10/10/21	\$ 400.00	lp - Logan Pardell	0.8	\$ 320.00	Consolidated information necessary for support of fee application
10/12/21	\$ 400.00	lp - Logan Pardell	0.1	\$ 40.00	Email exchange with O&G re information ISO fee application