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LAKESHORE LAW CENTER

Jeffrey Wilens, Esq. (State Bar No. 120371)
18340 Yorba Linda Blvd., Suite 107-610
Yorba Linda, CA 92886
Telephone No: (714) 854-7205
Facsimile No: (714) 854-7206
jeff@lakeshorelaw.org

SPENCER LAW FIRM

Jeffrey Spencer, Esq., (State Bar No. 182440)
2 Venture, Suite 220
Irvine, CA 92618
Telephone No: (949) 240-8595
Facsimile No: (949) 377-3272
jps@spencerlaw.net

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

MICHELL T. FRANKLIN, KARA)	Case No. 8:18-cv-02085-SB (DFMx)
SAMPSON, CYBELE A. MUNSON,)	
on behalf of themselves and all)	
persons similarly situated,)	CLASS ACTION
)	
Plaintiffs,)	DECLARATION OF JEFFREY
)	SPENCER IN SUPPORT OF
vs.)	MOTION FOR AWARD OF
)	ATTORNEYS' FEES AND COSTS
MIDWEST RECOVERY SYSTEMS,)	AND INCENTIVE AWARDS
LLC., COOPER FINANCIAL, LLC)	
PREVIOUSLY SUED AS DOE NO. 1,)	Hearing Date: September 24, 2021
MARK GRAY PREVIOUSLY SUED)	Time: 8:30 A.M.
AS DOE NO. 2, NATIONAL CREDIT)	Courtroom 6C
ADJUSTERS, LLC PREVIOUSLY)	Hon. Stanley Blumenfeld, Jr
SUED AS DOE NO. 3, DEBT)	
MANAGEMENT, LLC)	

1 PREVIOUSLY SUED AS DOE NO. 4,)
2 AND DOES 5 THROUGH 100)
3 INCLUSIVE,)
4)
5 Defendants.

6 **DECLARATION OF JEFFREY SPENCER**

7 I, JEFFREY SPENCER, hereby declare:

- 8 1. I am the principal of THE SPENCER LAW FIRM located at 2 Venture, Suite 220,
9 Irvine, CA 92618. I am one of the Counsel for the class in this matter. I have been
10 actively involved in all aspects of this litigation and I could and would competently
11 testify to the below stated facts of my own personal knowledge if called as a
12 witness.
13
- 14 2. My experience and qualifications to serve in that role are set forth below.
- 15 3. I am a graduate of the University of San Diego Law School. I was admitted to the
16 State Bar of California in 1996. I am admitted to practice before the Ninth Circuit
17 Court of Appeals and United States District Courts for the Central, Northern,
18 Eastern and Southern Districts. I was an associate with a law firm in Newport
19 Beach, California from 1996 to 1999. My practice consisted of complex civil
20 litigation in Federal and Superior Court. In August 1999, I co-founded Hansen &
21 Spencer. The firms' practice consisted of complex civil litigation, class actions and
22 criminal law. In September 2000, I founded the Law Offices of Jeffrey P. Spencer
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1 now the Spencer Law Firm. My firm's practice involves complex civil litigation
2 in Federal and Superior Court.

3 4. I have extensive experience in complex litigation and I am qualified to represent
4 the class in this action. I have been involved in leadership or class counsel positions
5 in complex litigation on an ongoing basis since 1996 to the present date. I have
6 never been ruled to be inadequate class counsel. Some of the cases in which I have
7 been appointed class counsel are listed below.
8

9
10 5. On July 31, 2020 the Honorable William Claster of the Orange County Superior
11 Court granted final approval of a class action settlement in the certified class action
12 consolidated cases of Pedroza v. El Dorado Inn and Valencia Inn, Case No. 30-
13 2014-00731601 in which I was appointed class counsel.
14

15 6. On June 22, 2020 the Honorable Jeffrey S. White Judge of the United States
16 District Court for the Northern District of California granted final approval of a
17 class action settlement in the certified class action case of Gilbert v. Money
18 Mutual, LLC, Case Number 13-cv-01171-JSW in which I was appointed class
19 counsel.
20
21

22 7. On December 10, 2019 the Honorable Elihu M. Berle of the Los Angeles Superior
23 Court granted a contested motion for class certification and appointed me class
24 counsel in the case of Howard v. The Roman Catholic Archdiocese of Los
25 Angeles, Case No. BC655179.
26
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1 8. On December 6, 2019 the Honorable William D. Claster of the Orange County
2 Superior Court granted final approval of a class action settlement and approved
3 me as class counsel in the case of Haddix v. Arena Inn & Suites Case No. 30-2016-
4 00892253-CU-BT-CXC.

5
6 9. On February 8, 2019 the Honorable Ronald F. Frazier of the San Diego Superior
7 Court granted final approval of a class action settlement and approved me as class
8 counsel in the case of Hansen v. California Suites Hotel, Case No. 37-2014-
9 00022185. The Court approved my hourly rate of \$750 per hour. A true and
10 correct copy of the Order is attached hereto as Exhibit 1.
11

12
13 10. On September 13, 2018 the Honorable Kenneth Freeman of the Los Angeles
14 Superior Court granted final approval of a class action settlement and approved
15 me as class counsel in the case of McClendon v. Airport Park View Hotel, Case
16 No. BC565521 and approved my hourly rate of \$750 per hour. A true and correct
17 copy of the Order is attached hereto as Exhibit 2.
18

19
20 11. On December 5, 2017 the Honorable John Shepard Wiley of the Los Angeles
21 Superior Court granted Final Approval of a class action settlement and approved
22 me as class counsel in the case of Cohen v. Chuck's Parking, Case No. BC 611085
23 and approved my hourly rate of \$750 per hour. A true and correct copy of the
24 Order is attached hereto as Exhibit 3.
25

26 12. On January 20, 2017, the Honorable Thierry P. Colaw granted final approval to a
27 class action settlement in which I had been appointed class counsel in Mingione v.
28

1 Events & Adventures, Orange County Superior Court Case No. 30-2012-00547490
2 and approved my hourly rate of \$700 per hour.

3 13. On December 12, 2016, the Fourth District Court of Appeals Ordered the case of
4 Hansen v. California Suites Hotels Inc. San Diego Superior Court Case No 37-
5 2014-00022185 certified as a class action in which I am co-class counsel. The case
6 alleged the Defendant violated Civil Code §1940.1 by engaging in the 28 day
7 shuffle practice.
8

9
10 14. On November 15, 2016 the Honorable David Carter Judge of the United States
11 District Court for the Central District of California granted a Final Approval of a
12 class action settlement and approved me as class counsel in the case of Hinshaw
13 v. Vizio Inc., case No. SACV 14-00876-DOC and approved my hourly rate of
14 \$700 per hour.
15

16
17 15. On October 17, 2016 The Honorable James V. Selna of the United States District
18 Court for the Central District of California granted a contested Motion for Class
19 Certification and approved me as class counsel in the case of Wilens v. Heart
20 Savers, LLC. Case No. SACV 15-0916-JVS.
21

22 16. On August 19, 2016 The Honorable William Claster of the Orange County
23 Superior Court granted two contested Motions for Class Certification and
24 appointed me to be class counsel in the consolidated case of Pedroza v. El Dorado
25 Inn and Valencia Inn, Case No. 30-2014-00731601.
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1 17. On June 9, 2016, the Honorable James v. Selna Judge of the United States District
2 Court for the Central District of California granted final approval of a class action
3 settlement and appointed me to be class counsel in the case of Keen v. Coral Reef
4 Productions, Case Number 8:14-cv-00814-JVS and approved my hourly rate of
5 \$700 per hour.
6

7 18. On February 8, 2016 the Honorable Jeffrey S. White Judge of the United States
8 District Court for the Northern District of California granted a contested motion
9 for class certification and approved me a class counsel in the case of Gilbert v.
10 Money Mutual, LLC, Case Number 13-cv-01171-JSW.
11

12 19. On December 18, 2015 the Honorable Wynne Carvill granted final approval of a
13 class settlement in Rainbolt v. Financial Assistance Inc., Alameda County
14 Superior Court Case No. RG12654833, and approved me as Class Counsel and
15 approved my hourly rate of \$700 per hour.
16
17

18 20. On July 17, 2015 the Honorable Judith F. Hayes granted final of a class action
19 settlement and approved me as class counsel in the case of Greco v. Selection
20 Management Systems Inc., San Diego Superior Court Case Number 37-2014-
21 00085074.
22

23 21. On December 13, 2013, the Honorable Wynne Carvill granted a contested motion
24 for class certification in Rainbolt v. Financial Assistance Inc., Alameda County
25 Superior Court Case No. RG12654833, and appointed me to be Class Counsel.
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1 22. On August 23, 2013, the Honorable Steven L. Perk granted a contested motion for
2 class certification in Mingione v. Events & Adventures, Orange County Superior
3 Court Case No. 30-2012-00547490, and appointed me to be Class Counsel.

4 23. On January 23, 2013, The Honorable Kim G. Dunning of the Orange County
5 Superior Court granted a contested Motion for Class Certification in the case of
6 Davis v. Citibank N.A. Case No. 30-2008-00060145 and appointed me to be class
7 counsel. The Court approved a class action settlement in that case on October 16,
8 2013.
9

10 24. On December 10, 2012 The Honorable John S. Wiley of the Los Angeles County
11 Superior Court granted final approval of a class action settlement in the case of
12 Walker v. Peninsula Beverly Hills, Inc., Case No. BC 414261 and approved me as
13 class counsel.
14

15 25. On October 11, 2012 The Honorable Steven A. Brick of the Alameda County
16 Superior Court granted final approval of a class action settlement in the case of
17 Hamilton v. Vitamin World, Case No. RG10524008 and approved me as class
18 counsel class counsel.
19

20 26. On October 5, 2011 The Honorable Kim G. Dunning of the Orange County
21 Superior Court granted final approval of a class action settlement in the case of
22 Lavergne v. Evergreen Royale LTD. Case No. 30-2008-00212468 in which I had
23 been previously appointed class counsel after a contested Motion for Class
24 Certification.
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1 27. On April 15, 2011 The Honorable Kim G. Dunning of the Orange County Superior
2 Court granted final approval of a class action settlement in the case of Adams v.
3 Luxottica Case No. 07CC01346 in which I had been appointed class counsel.

4 28. On March 24, 2011 The Honorable Gail A. Andler of the Orange County Superior
5 Court granted final approval of a class action settlement in case of Narcisse v.
6 Eyexam of California Case No. 30-2008-00074926 and approved me as class
7 counsel.
8

9 29. On March 11, 2011, The Honorable Kim G. Dunning of the Orange County
10 Superior Court granted final approval of a class action settlement in case of
11 Thompson v. Vitamin Shoppe Case No. 05CC00048 and approved me as class
12 counsel.
13

14 30. On September 23, 2010, The Honorable David Velasquez of the Orange County
15 Superior Court granted final approval to a class action settlement and approved me
16 as class counsel in Clark v. United Health Care Group, Inc. Case No. 30-2008-
17 00087508.
18

19 31. On June 3, 2010, The Honorable David Velasquez of the Orange County Superior
20 Court granted final approval to a class action in which I had been appointed class
21 counsel in Haynes v. Wetseal, Case No. 30-2009-00253682.
22

23 32. On December 4, 2009, the Honorable Thierry P. Colaw of the Orange County
24 Superior Court appointed me as Class Counsel after a contested motion for class
25
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1 certification in Lavergne v. Evergreen Royale, LTD., Case No. 30-2008-
2 00212468.

3 33. On April 9, 2009, the Honorable Gail A. Andler of the Orange County Superior
4 Court granted a contested motion for class certification and appointed me as a class
5 counsel in Bracamonte v. The May Department Store Company, Case No.
6 05CC00129, (Order entered December 1, 2009). That Court granted final approval
7 of a class action settlement January 7, 2011.
8

9
10 34. On July 6, 2009, the Honorable Ben T. Kayashima of the San Bernardino County
11 Superior Court granted final approval to a class action settlement and approved me
12 as class counsel in Amaya v. 3M, Case No. CIVRS702515.
13

14 35. On June 3, 2009, the Honorable Conrad A. Aragon of the Los Angeles County
15 Superior Court granted final approval 1 to a class action settlement and approved
16 me as class counsel in Coburn v. Stamps.com, Case Number BC353721.
17

18 36. On August 28, 2008, Judge Stephen Sundvold of the Orange County Superior
19 Court granted final approval to a class action settlement and approved me as class
20 counsel in Babasa v. Lenscrafters, Case No. 05CC00079.
21

22 37. On March 28, 2008, Judge David Velasquez of the Orange County Superior Court
23 granted final approval to a class action settlement and approved me as class
24 counsel in Devoe v. EZ Lube, Case No. 06CC00042.
25

26 38. On April 27, 2007, Judge Ronald Prager of the San Diego Superior Court granted
27 a contested motion for class certification and appointed me as a class counsel in
28

1 Landers v. Progress Management, Case No. GIC857866. That lawsuit settled
2 months after the class certification hearing.

3 39. In 2005 the Court granted final approval of a class action settlement and approved
4 me as class counsel in the case of Magdaleno v. Talent Tree, Los Angeles Superior
5 Court case number BC 272913.

6
7 40. In 2004, Judge Ronald L. Bauer of the Orange County Superior Court granted final
8 approval of a class action settlement and approved me as a class counsel in
9 Capelouto v. General Nutrition Centers, Case No. 01CC00138.

10
11 41. In 2004, I was approved as one of the counsel for the plaintiff class and was a
12 member of the Steering Committee and one of three attorneys on the settlement
13 committee that negotiated a \$65 million settlement in the Consolidated DSL
14 litigation against SBC in San Diego Superior Court, case no. JCCP No. 4151.

15
16 42. In June 2003, Judge Stephen Sundvold of the Orange County Superior Court
17 granted final approval to a class action settlement and approved me as class
18 counsel in McDonald v. RealNetworks, Case No. 816666.

19
20 43. In 2001 Judge Moore of the of the Los Angeles Superior Court granted final
21 approval of a class action settlement and approved me as class counsel in the case
22 of Brown v. Aureate, Case Number BC225886.

23
24
25 44. I am the attorney of record in several other representative and complex cases at
26 various stages of litigation throughout the State of California.

1 45. Plaintiffs were unable to pay Counsel their hourly rates and could not have brought
2 this action unless Counsel was willing to accept this case on a contingency fee
3 basis.

4 46. Class Counsel have a joint venture agreement that provides they will work together
5 on various lawsuits and class actions and each attorney will be paid attorneys' fees
6 in proportion to their respective lodestars for the amount of work done on the
7 particular case and each will be reimbursed for the costs they advanced. The Legal
8 Services Agreements signed by Plaintiffs provide that they were hiring both the
9 Spencer Law Firm and the Lakeshore Law Center to represent them and that both
10 attorneys would collectively apply to the Court for compensation in the event of a
11 class action settlement.
12

13 47. My current billing rate for non-contingency matters is \$775 per hour, however for
14 the purposes of this motion I am requesting fees at the rate of \$750 per hour. This
15 amount is supported by my academic and professional credentials as well as my
16 expertise in the prosecution of consumer and employee class action, and has been
17 approved by other courts in similar litigation as far back as 2017 and in Exhibits
18 1-3 attached hereto. I am familiar with the prevailing market rate for attorneys
19 with similar experience and credentials in consumer law cases, and particularly in
20 consumer class action and declare that the \$750 rate is consistent with the market
21 rate.
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48. As of the filing of this Declaration, attorney Jeffrey Spencer of the Spencer Law Firm has expended over 164.40 hours in the prosecution of this action billed at the rate of \$750 per hour for a lodestar of \$123,310. A true and correct copy of my contemporaneous time and expense records is attached as Exhibit 4.

49. The litigation has been time consuming and the time dedicated to the litigation has precluded my firm's ability to work on other matters.

50. There was no unnecessary duplication of effort and the combined efforts of Jeffrey Spencer and Jeffrey Wilens were required for the successful outcome in the case.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, except as to those matters stated on information and belief, and as to those matters I believe them to be true.

Executed on July 21, 2021 at Irvine, California.

By: 

JEFFREY SPENCER Esq.
Attorneys for Plaintiffs

1 **LAKESHORE LAW CENTER**
2 **Jeffrey Wilens, Esq. (State Bar No. 120371)**
3 **18340 Yorba Linda Blvd., Suite 107-610**
4 **Yorba Linda, CA 92886**
5 **714-854-7205**
6 **714-854-7206 (fax)**
7 **jeff@lakeshorelaw.org**

ELECTRONICALLY RECEIVED
Superior Court of California,
County of San Diego
01/14/2019 at 08:00:00 AM
Clerk of the Superior Court
By Jessica Pascual, Deputy Clerk

8 **SPENCER LAW FIRM**
9 **Jeffrey P. Spencer, Esq. (State Bar No. 182440)**
10 **2 Venture, Suite 220**
11 **Irvine, CA 92618**
12 **949-240-8595**
13 **949-377-3272 (fax)**
14 **jps@spencerlaw.net**

FILED
Clerk of the Superior Court
FEB 08 2019
By: L. Urie, Clerk

15 **Attorneys for Plaintiff**

16 **SAN DIEGO COUNTY SUPERIOR COURT, STATE OF**
17 **CALIFORNIA (Unlimited Civil), Hall of Justice**
18 **330 W. Broadway, San Diego, CA 92101**

19 LINDSEY MARIE HANSEN, et. al.) Case No. 37-2014-00022185-CU-BT-CTL
20) Assigned for All Purposes to:
21) Hon. Ronald F. Frazier
22) Dept. 65
23) Complaint Filed: July 7, 2014
24) Hearing Date: February 8, 2019, 8:30 a.m.
25)
26) CLASS ACTION
27) **ORDER GRANTING FINAL**
28) **APPROVAL OF SETTLEMENT, AWARD**
Plaintiff,) **OF ATTORNEY'S FEES AND INCENTIVE**
v.) **AND AUTHORITIES, DECLARATIONS**
CALIFORNIA SUITES HOTEL, et. al.,) **AWARD AND ENTRY OF FINAL**
Defendants.) **JUDGMENT**
) No reservation number needed per Kimberly

29 TO EACH PARTY AND THEIR ATTORNEY OF RECORD:

30 WHEREAS, the parties having made an application, pursuant to Code of Civil

1 Procedure § 382 and California Rule of Court 3.769, for an order finally approving the
2 settlement of this action (the “Action”) pursuant to the Stipulation of Settlement dated
3 as of August 6, 2018 (the “Stipulation”), which, together with its attached Exhibits, sets
4 forth the terms and conditions for a proposed settlement of the Action and entry of a
5 final judgment; and WHEREAS, the Court having read and considered the Stipulation
6 and its attached Exhibits, NOW HEREBY ORDERS:

7 The Application of Representative Plaintiff Lindsey Marie Hansen for orders
8 granting final approval of a class action settlement, award of attorney’s fees and costs,
9 incentive award, and entry of judgment pursuant to the terms of the Stipulation of
10 Settlement (“Settlement Agreement”), came on for hearing on February 8, 2019 before
11 the Honorable Ronald F. Frazier of the San Diego County Superior Court. Jeffrey
12 Wilens of the Lakeshore Law Center appeared for Plaintiff and the Class.

13 Defendants did not oppose Plaintiff’s motion and no Settlement Class Members
14 objected to the Settlement. Based on the oral and written arguments and evidence
15 presented in connection with the motion, the Court makes the following findings of fact:

16 **FINDINGS**

17 1. This Order and Judgment incorporates by reference the definitions in the Stipulation
18 of Settlement, and all terms used herein shall have the same meanings as set forth in
19 the Stipulation.

20 **Certification of the Settlement Class**

21 2. Pursuant to Code of Civil Procedure § 382 and California Rule of Court 3.769, this
22 Court previously certified the following class and subsequently reaffirmed that these
23 persons constitute the Settlement Class in granting preliminary approval to this class
24 action settlement: “All persons who resided at the California Suites Hotel for at least
25 14 consecutive days between July 7, 2011 and November 1, 2014 and who were
26 required to move out or to check out and reregister before the expiration of 30
27 consecutive days of occupancy.”

28 3. Excluded from the Settlement Class are: (a) persons living at California Suites Hotel

1 who were an employee of Defendants and any person not listed in the class list that
2 was used to provide notice; and (b) all Persons who “opted-out” after the prior
3 certification order; however, no one opted out.

- 4 4. The Court now reiterates its prior findings that (a) the Settlement Class is
5 ascertainable and so numerous that joinder of all Settlement Class Members in the
6 Action is impracticable; (b) in view of the Settlement, there are questions of law and
7 fact common to the Settlement Class that predominate over any individual
8 questions; (c) the claims of Representative Plaintiff Lindsey Marie Hansen are
9 typical of the claims of the Class; (d) Representative Hansen has fairly and
10 adequately represented and protected the interests of the Settlement Classes; and (e)
11 in the context of settlement, a class action is superior to other available methods for
12 the fair and efficient adjudication of the controversy; and (f) certification
13 substantially benefits the Court and the litigants by avoiding potentially time-
14 consuming, expensive, and uncertain litigation, providing relief to all Settlement
15 Class Members and permitting entry of a judgment binding on Settlement Class
16 Members, thereby avoiding repetitious litigation

17 **Settlement Notice**

- 18 5. The Court previously approved the form of Settlement Notice and the proposed
19 manner of its distribution to Settlement Class Members.
- 20 6. The Court again finds that the Settlement Notice reasonably and adequately
21 informed Settlement Class Members of the nature of this Action, the terms of the
22 proposed Settlement, the proposed release of claims, and Settlement Class Members’
23 rights to participate in the Action and Settlement or object to the Settlement.
- 24 7. In compliance with the Preliminary Approval Order, the Class Notice was mailed to
25 all members of the class with complete addresses or for whom a complete address
26 could be developed. CTP Group was able to mail notices to 689 of the 892 class
27 members. Notices were returned to sender for 235 class members, but CPT was able
28 (through various means) to remail those to 117 persons. Ultimately, 118 notices were

1 undeliverable. The Class Notice was also published by November 10, 2018 on the
2 website at <https://www.lakeshorelaw.org/californiasuiteshotel>.

3 8. The deadline to file objections or to opt-out was January 9, 2019. No objections have
4 been filed or served.

5 **Fairness of Settlement**

6 9. The Settlement is entitled to a presumption of fairness. (See Dunk v. Ford Motor Co.
7 (1996) 48 Cal.App.4th 1794, 1801-1802.)

8 a) The Settlement was reached through arm's-length negotiation between the
9 Parties and without any collusion between the parties.

10 b) Plaintiff's investigation, discovery, and analysis of discovery have been more than
11 sufficient to allow the Court and counsel to decide on the fairness of this
12 Settlement carefully and with deliberation.

13 c) Counsel are experienced in similar class action litigation and have recommended
14 approval of the Settlement.

15 d) There were no objectors to the settlement and no requests for exclusion from the
16 previous certification order.

17 10. The consideration to be given to the Settlement Class under the terms of the
18 Stipulation is reasonable considering the strengths and weaknesses of the claims
19 asserted in this Action and Defendants' financial resources and insurance coverage.

20 11. Moreover, the Settlement provides fair, reasonable, just and adequate compensation
21 for the dismissal of this action and release of Settlement Class Members' claims in
22 light of the uncertainties and risks of litigation and the delays that would ensue from
23 continued prosecution of this action.

24 12. Accordingly, the Settlement is fair, adequate, reasonable, and in the best interests of
25 the Settlement Class and its members.

26 **Adequacy of Representation**

27 13. At all times in the prosecution of this action, the negotiation of the Settlement, and
28 its presentation to this Court, the Settlement Class has been adequately represented

1 by Representative Plaintiff and by competent counsel, Jeffrey Wilens of the
2 Lakeshore Law Center and Jeffrey Spencer of the Spencer Law Firm.

3 14. Representative Plaintiff's Counsel have exercised skill and experience in
4 representing the Settlement Class and have adequately represented and protected
5 the interests of the Settlement Class in the action and in negotiating the Settlement.

6 **Attorneys' Fees and Costs**

7 15. The Stipulation provides for payment of up to \$250,000 to Class Counsel as
8 attorney's fees and up to \$10,000 for reimbursement of costs and expenses in the
9 Action, subject to the Court's approval. Settling Defendants agreed to pay fees, costs
10 and expenses in those amounts in addition to the benefits otherwise payable to the
11 Settlement Class Members under the terms of the Stipulation.

12 16. Class Counsel have spent in excess of 334 hours working on this case **as of January**
13 **11, 2019** and will spend some additional hours in the subsequent proceedings. At
14 the time of the Settlement, Class Counsel's normal hourly rates were \$750 for Jeffrey
15 Spencer and \$750 for Jeffrey Wilens. These hourly rates were within the range of
16 hourly fees reasonably and normally charged by attorneys in this area of comparable
17 experience in cases of similar nature and complexity. Representative Plaintiff's
18 Counsel also paid litigation costs and expenses in the amount of \$6,101 **as of**
19 **January 11, 2019.**

20 17. An award of \$250,000 in attorneys' fees and costs and expenses is reasonable in
21 light of the contingent nature of Representative Plaintiff's Counsel fees as well as the
22 novelty and difficulty of questions of law and fact involved in this case, some of
23 which had to be addressed on appeal, and the amount of compensation paid to class
24 members.

25 **Incentive Award**

26 18. The Stipulation provides for a payment of \$10,000 as an incentive award to
27 Representative Plaintiff Lindsey Marie Hansen subject to the Court's approval.

28 19. The payment of an incentive award to a named plaintiff and class representative is

1 often a feature of class action settlements. It is intended to advance public policy by
2 encouraging individuals to come forward and perform their civic duty in protecting
3 the rights of the class and to compensate class representatives for their time, effort
4 and inconvenience. The amount of the payment is reasonable in light of the risks,
5 burdens and responsibilities undertaken by the named Plaintiff in this Action. She
6 stepped up to bring this lawsuit on behalf of less sophisticated residents of California
7 Suites Hotel and necessarily exposed herself to embarrassing facts and well as
8 economic risk if she did not prevail. The payment of an incentive award in the
9 amounts stated above does not unduly favor the Representative Plaintiff.

10 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED**

11 20. For purposes of the Action, the Court has subject matter and personal jurisdiction
12 over the parties, including all Settlement Class Members.

13 21. This Final Approval Order shall serve as a Judgment against Defendants California
14 Suite Hotel, San Diego California Lodge, LLC, E Tse Lin, Jen Tao Lin, and Ing Wen
15 Hwang.

16 22. Consistent with its prior order granting a motion for class certification and pursuant
17 to Code of Civil Procedure § 382 and California Rule of Court 3.769, the Court
18 certifies, solely for purposes of effectuating the Settlement, the Settlement Class,
19 which consists of the following: "All persons who resided at the California Suites
20 Hotel for at least 14 consecutive days between July 7, 2011 and November 1, 2014
21 and who were required to move out or to check out and reregister before the
22 expiration of 30 consecutive days of occupancy."

23 23. The Court acknowledges that Settling Defendants would not have entered into the
24 Settlement without adequate assurance that they would not be precluded from trying
25 to contest class certification of the settlement class in the event the Settlement is not
26 consummated. Accordingly, in the event that the approval of the Settlement is
27 reversed on appeal or the Effective Date is not reached for any reason, the Parties
28 will be restored to the positions they held prior to preliminary approval.

- 1 24. The Effective Date of the Settlement is February 8, 2019.
- 2 25. As of the Effective Date, Plaintiff and each Settlement Class member acknowledges
3 full satisfaction of all Settled Claims (as defined below), and fully, finally and forever
4 releases, settles and discharges Defendants, their present and former parents,
5 stockholders, investors, subsidiaries, affiliates, predecessors, and successors and its
6 present and former officers, directors, insurers, employees, agents, and attorneys
7 (collectively, the "Released Persons"), from all Settled Claims, known and unknown.
- 8 26. For purposes of this Judgment, "Settled Claims" means and includes any and all
9 claims, demands, rights, liabilities and causes of action, including but not limited to
10 those for violation of Civil Code § 1940.1, Civil Code § 52.1, Business and Professions
11 Code § 17200, interference with the right to use or enjoyment of the room, wrongful
12 eviction or entry, trespass, deprivation of possessory interest in the room,
13 interference, or violation of the right of private occupancy of a room, which relate in
14 any way to the allegations presented in Plaintiff's Complaint in this action, or the
15 alleged practice or requiring occupants to depart by the 28th day of occupancy.
16 "Settled Claims" does not include any other claim related to the Class Member's
17 occupancy or tenancy at the California Suites Hotel with respect to any bodily injury
18 claim or emotional distress
- 19 27. As of the Effective Date, Plaintiff Lindsay Marie Hansen additionally generally
20 relieves and releases the Released Persons from all other claims, known and
21 unknown, in addition to the Settled Claims, which she may have against the Released
22 Persons. As of the Effective Date, Plaintiff also waives and relinquishes, to the fullest
23 extent permitted by law and subject any and all claims arising from the tenancy or
24 occupancy of class members except for claims of bodily injury. As of the Effective
25 Date, Plaintiff further waives and relinquishes, to the fullest extent permitted by law
26 and subject to the foregoing provisions, the benefits of California Civil Code § 1542
27 and all similar state or federal statutes or rules of law. California Civil Code § 1542
28 provides: "A general release does not extend to claims which the creditor

1 does not know or suspect to exist in his or her favor at the time of
2 executing the release, which if known by him or her must have
3 materially affected his or her settlement with the debtor.” The Parties
4 understand and acknowledge that a risk exists that they incurred or suffered or may
5 incur or suffer loss or damages as a result of the matters, facts, events, occurrences,
6 transactions, causes, and things referred to in this Agreement, which were unknown,
7 unsuspected, or unanticipated at the times this Agreement was executed. The Parties
8 each assume this risk, and agree that the foregoing release shall, in all respects, be
9 effective and not subject to termination or rescission.

10 28. CPT Group, Inc. has previously been named to be the Settlement Administrator.
11 That designation is confirmed.

12 29. Settling Defendants should already have created a common settlement fund,
13 hereinafter Gross Settlement Fund, by causing to be deposited the sum of \$750,000
14 (seven hundred fifty thousand dollars) into an interest-bearing trust or escrow
15 account administered by CPT for the sole purpose of funding this settlement. If they
16 have not done so already, they shall do so immediately.

17 30. CPT may reimburse itself out of the Gross Settlement Fund the sum of \$10,000 for
18 settlement administration expenses.

19 31. The Court awards attorney’s fees to Class Counsel collectively in the amount of
20 \$250,000 and court costs and expenses collectively in the amount of \$6,101. CPT is
21 directed to pay these sums to Class Counsel within five days of the Effective Date as
22 follows: \$164,000 in fees and \$5,683 in costs and expenses shall be paid to
23 Lakeshore Law Center; and \$86,000 in fees and \$418 in costs and expenses shall be
24 paid to the Spencer Law Firm.

25 32. An incentive award of \$10,000 is awarded to Representative Plaintiff Lindsey Marie
26 Hansen. CPT is directed to pay this sum by check payable to Lindsey Marie Hansen
27 delivered to the Lakeshore Law Center within ten days of the Effective Date.

28 33. The balance of the Gross Settlement Fund after the foregoing payments are made

1 shall constitute the Net Settlement Fund. CPT shall mail individual settlement
2 checks to each Class Member for whom there is a valid address. The amount of each
3 check shall be calculated as follows: (X / Y times NSF) where X = the number of
4 distinct 14-30 day stays of that Class Member and Y = the total number of such stays
5 for all Class Members. No Class Member shall be paid more than \$500 per distinct
6 stay. It is estimated there are approximately 1,179 violations suffered by Class
7 Members. Therefore, if the settlement is fully approved by the Court each class
8 member will receive **\$398 per violation** (14-30 day stay).

9 34. The aforementioned individual checks shall be mailed by CPT to the Class Members
10 within 90 days of the Effective Date.

11 35. Each Class Member's payment checks shall be valid for 120 days from date of
12 issuance and then will become void. A Class Member may attempt to exchange a void
13 check for a reissued one by contacting the Settlement Administrator up to 150 days
14 from date of issuance.

15 36. Any funds intended to be paid to Class Members, but which are not deliverable, or
16 which are not negotiated within 150 days will be forfeited and those funds will be
17 paid to the Cy Pres Organization identified below.

18 37. Some of the settlement payments owed to class members cannot be delivered
19 because the class member cannot be identified with sufficient accuracy due to
20 incomplete records maintained by Defendants. Based on CPT's analysis, 571 class
21 members can be sent an individual settlement payment. The money that would have
22 been paid to the remaining class members will be aggregated and paid to the Cy Pres
23 organization. That amount is \$157,065.32, but it might be altered if the Court does
24 not award the full amounts sought for attorney's fees and costs, the incentive award,
25 or compensation to the Settlement Administrator.

26 38. The Court has reviewed the material pertaining to the Cy Pres organization
27 provisionally approved at the preliminary approval hearing. The Court finds that the
28 San Diego Regional Task Force on the Homeless is an interagency organization

1 which includes governmental agencies and private charities. This is an appropriate
2 recipient of the Cy Pres funds because 1) It serves the greater San Diego community
3 where the California Suites Hotel is located and where many of the hotel residents
4 live; the Task Force aids homeless people and people who are vulnerable to falling
5 into that status; and 3) there is a reasonable connection between the violations
6 committed by the Defendants and persons who suffer from homelessness or the risk
7 of homelessness.

8 39. CPT is directed to pay the sum specified in paragraph 37 (adjusted as necessary) by
9 check payable to the San Diego Regional Task Force on the Homeless delivered to
10 the Lakeshore Law Center within thirty days of the Effective Date. CPT shall pay any
11 additional sums owed to the Cy Pres organization within 180 days after the Effective
12 Date.

13 40. Within 180 days after the Effective Date, CPT shall submit a sworn declaration to the
14 Court, confirming that all class members have been paid or that any payments which
15 were undeliverable have been paid to the Cy Pres Organization, confirming that all
16 other payments for attorney's fees and costs and for the incentive award have been
17 paid, confirming what amount has been paid to CPT for administrative costs and
18 disclosing the current balance in the Gross Settlement Fund trust/escrow account.

19 41. Any appellate challenge, reversal or future court order regarding the application for
20 attorneys' fees and costs by Representative Plaintiff and Class Counsel shall in no
21 way disturb or affect this Judgment and shall be considered separate from this
22 Judgment.

23 42. Without affecting the finality of this Judgment in any way, this Court hereby retains
24 continuing jurisdiction over: (a) implementation and enforcement of this Settlement
25 and any disputes concerning that implementation or enforcement and (b) all Parties
26 hereto solely for the purpose of construing, enforcing and administering the
27 Settlement as set forth above.

28 43. In the event that the Settlement does not become effective in accordance with the

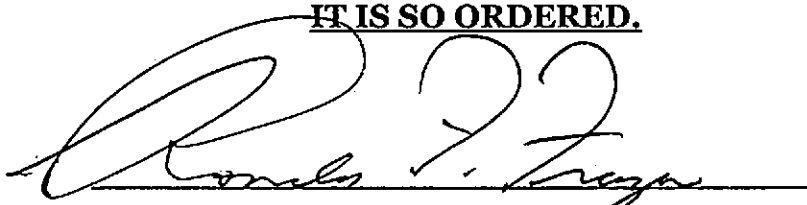
1 terms of the Settlement, then this Judgment shall be rendered null and void to the
2 extent provided by and in accordance with the Settlement and shall be vacated and,
3 in such event, all orders entered and releases delivered in connection with this
4 Judgment shall be null and void to the extent provided by and in accordance with the
5 Settlement.

6 44. Neither the Stipulation nor the Settlement, including the agreement by Defendants
7 to stipulate for settlement purposes only to a Settlement Class, nor any act
8 performed or document executed pursuant to or in furtherance of the Stipulation or
9 the Settlement: (a) is or may be deemed to be or may be used as an admission of, or
10 evidence of, the validity of any Settled Claim, or of any wrongdoing or liability of the
11 Defendants; (b) is or may be deemed to be or may be used as an admission of, or
12 evidence of, any fault or omission of the Defendants in any civil, criminal or
13 administrative proceeding in any court, administrative agency or other tribunal; or
14 (c) shall provide a basis for estopping or otherwise preventing Defendants from
15 opposing class certification in the Action or in any other case.

16 45. Notwithstanding the reservation of jurisdiction in Paragraph 42, this is a final and
17 appealable judgment that ends the litigation of all claims alleged in this Action. The
18 Clerk is directed to enter this Judgment forthwith.

19
20 **IT IS SO ORDERED.**

21
22 Date: February 8, 2019

23 

24 RONALD F. FRAZIER
25 San Diego County Superior Court
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Superior Court of California
County of Los Angeles

SEP 13 2018
Shari R. Gentry, Executive Officer/Clerk
Roxanne Arrais, Deputy

FILING WINDOW

1 **SPENCER LAW FIRM**
2 Jeffrey Spencer, Esq., (State Bar No. 182440)
3 2 Venture, Suite 220
4 Irvine, CA 92618
5 Telephone No: (949) 240-8595
6 Facsimile No: (949) 377-3272
7 jps@spencerlaw.net

8 Attorneys for Plaintiff

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11	PEARSON McCLENDON and DARRYL GREEN individually, and on behalf of all persons similarly situated, Plaintiff,)	CASE NO BC565521
12	vs.)	Assigned for All Purposes to the Honorable Kenneth Freeman Dept. 14
13)	CLASS ACTION
14	MEGA TEAM MANAGEMENT CORP. DBA AIRPORT PARK VIEW HOTEL, KUOK CHEONG WONG, THOMAS K. L. WONG, KUOK SU WONG and DOBS 1 THROUGH 100 INCLUSIVE, Defendants.)	Revised [REDACTED] ORDER and JUDGMENT GRANTING FINAL APPROVAL OF CLASS ACTION SETTLEMENT
15)	Date: September 13, 2018
16)	Time: 10:00 a.m.
17)	Dept.: 14

18
19 The Application of Representative Plaintiffs Pearson McClendon and Darryl Green for
20 Orders granting final approval of a class action settlement, award of attorney's fees and costs,
21 incentive award, and entry of judgment pursuant to the terms of the Stipulation of Settlement
22 ("Settlement Agreement"), came on for hearing on September 13, 2018 before the Honorable
23 Kenneth Freeman of the Los Angeles Superior Court.

24 Defendant did not oppose Plaintiffs' motion and no Settlement Class Members objected to
25 the Settlement. Based on the oral and written arguments and evidence presented in connection
26 with the motion, the Court makes the following findings of fact:

27 **FINDINGS**

- 1 1) This Order incorporates by reference the definitions in the Stipulation of Settlement, and all
2 terms used herein shall have the same meanings as set forth in the Stipulation.
- 3 2) Pursuant to Code of Civil Procedure Section 382 and California Rule of Court 3.769, the Court
4 previously conditionally certified, solely for purposes of effectuating the Settlement, a class
5 (the "Settlement Class") as follows:
- 6 All individuals who resided at the Airport Park View Hotel for at least
7 14 consecutive days and moved out or checked out before the
8 expiration of 30 consecutive days of occupancy between December
2, 2010 and May 1, 2016.
- 9 3) Excluded from the Settlement Class are: all Persons who "opt-out" of the Settlement in
10 accordance with the terms of this Stipulation.
- 11 4) Regarding the Settlement Class, the Court again finds and concludes solely for purposes of
12 effectuating the Settlement, that:
- 13 a) the Settlement Class is ascertainable;
- 14 b) the Settlement Class is so numerous that joinder of all Settlement Class Members in the
15 Action is impracticable;
- 16 c) there are questions of law and fact common to the Settlement Class that predominate over
17 any individual questions, including whether the Settlement is fair, adequate, and reasonable,
18 and in the best interests of the Settlement Class given the risks and benefits of proceeding to
19 trial on Representative Plaintiffs' claims;
- 20 d) the claims of the Representative Plaintiffs are typical of the claims of the Settlement Class;
- 21 e) Representative Plaintiffs and Representative Plaintiffs' Counsel Jeffrey Spencer and the
22 Spencer Law Firm have fairly and adequately represented and protected the interests of the
23 Settlement Class; and a class action is superior to other available methods for the fair and
24 efficient adjudication of the controversy because, among other reasons, (i) settlement of this
25 action is contingent on certification of the Settlement Class, and (ii) certification of the
26 Settlement Class will permit entry of a judgment binding on the Settlement Class.
- 27 f) Certification of the Settlement Class substantially benefits the Court and the litigants.
28 Certification permits approval of the Stipulation, avoiding potentially time-consuming,

expensive, and uncertain litigation.

1
2 g) Certification of the Settlement Class also provides relief to all Settlement Class Members,
whom Plaintiffs claim are aggrieved by Defendants' actions.

3
4 h) Settlement of this case on a class basis permits entry of a judgment binding on Settlement
Class Members, thereby avoiding repetitious litigation.

5 **Settlement Notice**

6 5) The Court previously approved the form of Settlement Notice and the proposed manner of its
7 distribution to Settlement Class Members.

8 6) The Court again finds that the Settlement Notice reasonably and adequately informed
9 Settlement Class Members of the nature of this Action, the terms of the proposed Settlement,
10 the proposed release of claims, and Settlement Class Members' rights to participate in the
11 Action and Settlement and to exclude themselves or object to the Settlement.

12 7) In compliance with the Preliminary Approval Order, the Class Notice and the Class Action
13 Claim Information Form was mailed by first class mail to Settlement Class Members at their
14 last known addresses on or about June 14, 2018.

15 8) This mailing of the aforementioned documents was the best notice practicable under the
16 circumstances and was reasonably calculated to communicate actual notice of the Settlement to
17 Settlement Class Members.

18 9) The deadline for opting out from or objecting to the Settlement was July 30, 2018. There was
19 an adequate interval between notice and the deadline to permit Settlement Class Members to
20 choose to opt out or to object and to take the necessary actions to effect their decision.

21 10) No Class Members opted out of the Settlement and no Class Members have objected to the
22 settlement.

23 **Fairness of Settlement**

24 11) The Settlement is entitled to a presumption of fairness. (See Dunk v. Ford Motor Co. (1996)
25 48 Cal.App.4th 1794, 1801-1802.)

26 a) The Settlement was reached through arm's-length negotiation between the parties and
27 without any collusion between the parties.

28 b) Plaintiff's investigation, discovery, and analysis of discovery have been more than sufficient

1 to allow the Court and counsel to decide on the fairness of this Settlement carefully and with
2 deliberation.

3 c) Counsel is experienced in similar class action litigation and has recommended approval of
4 the Settlement.

5 d) There were no objectors and no requests for exclusion.

6 12) The consideration to be given to the Settlement Class under the terms of the Stipulation is
7 reasonable considering the strengths and weaknesses of the claims asserted in this Action.

8 13) Moreover, the Settlement provides fair, reasonable, just and adequate compensation for the
9 dismissal of this action and release of Settlement Class Members' claims in light of the
10 uncertainties and risks of litigation and the delays that would ensue from continued prosecution
11 of this action.

12 14) Accordingly, the Settlement is fair, adequate, reasonable, and in the best interests of the
13 Settlement Class and its members.

14 **Adequacy of Representation**

15 15) At all times in the prosecution of this action, the negotiation of the Settlement, and its
16 presentation to this Court, the Settlement Class has been adequately represented by
17 Representative Plaintiffs and by competent counsel, Jeffrey Spencer of the Spencer Law Firm.

18 16) Representative Plaintiffs' Counsel Jeffrey Spencer of the Spencer Law Firm has exercised skill
19 and experience in representing the Settlement Class and has adequately represented and
20 protected the interests of the Settlement Class in the action and in negotiating the Settlement.

21 **Attorneys' Fees and Costs**

22 17) The Stipulation provides for payment of up to \$400,000 to Class Counsel as attorney's fees and
23 up to \$20,000 in costs and expenses in the Action, subject to the Court's approval. Defendants
24 have agreed to pay fees, costs and expenses in those amounts in addition to the benefits
25 otherwise payable to the Settlement Class Members under the terms of the Stipulation.

26 18) Class Counsel the Spencer Law Firm has spent or will spend in excess of 570 hours working
27 on this case over more than 3 ½ years, a reasonable amount of time given the nature of the case
28 and the claims at issue in the action. Class Counsel Jeffrey Spencer's normal hourly rate is
\$750. This hourly rate is within the range of hourly fees reasonably and normally charged by

1 attorneys in this area of comparable experience in cases of similar nature and complexity. Class
2 Counsel also incurred litigation costs and expenses in excess of \$5,091.25.

3 19) An award of \$400,000 in attorneys' fees and \$5,091.25 in costs and expenses to Class Counsel
4 Jeffrey Spencer and the Spencer Law Firm is reasonable in light of the amount of the settlement
5 fund, the contingent nature of Class Counsel's fees as well as the novelty and difficulty of
6 questions of law and fact involved in this case and the amount of compensation paid to class
7 members.

8 **Incentive Award**

9 20) The Stipulation provides for a payment of up to \$7,500 as an incentive award to Representative
10 Plaintiff Darryl Green and for a payment of up to \$7,500 as an incentive award to Representative
11 Plaintiff Pearson McClendon subject to the Court's approval. Defendants have agreed to pay
12 those amounts in addition to the benefits otherwise payable to the Settlement Class Members
13 under the terms of the Stipulation. The Court will approve incentive awards in the amount of
14 \$5,000 to Representative Plaintiff Pearson McClendon and \$5,000 to Representative Plaintiff
15 Darryl Green.

16 21) The payment of an incentive award to a named plaintiff and class representative is often a
17 feature of class action settlements. It is intended to advance public policy by encouraging
18 individuals to come forward and perform their civic duty in protecting the rights of the class
19 and to compensate class representatives for their time, effort and inconvenience. The amount
20 of the payments awarded by the Court is reasonable in light of the risks, burdens and
21 responsibilities undertaken by the named Plaintiffs in this Action. The payment of an incentive
22 award does not unduly favor the Representative Plaintiffs nor is the award paid at the expense
23 of the Settlement Class.

24 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED**

25 22) For purposes of the Action, the Court has subject matter and personal jurisdiction over the
26 parties, including all Settlement Class Members.

27 23) Consistent with its prior order granting a motion for preliminary approval and pursuant to Code
28 of Civil Procedure § 382 and California Rule of Court 3.769, the Court certifies, solely for
purposes of effectuating the Settlement, the Settlement Class, which consists of the following:

1 All individuals who resided at the Airport Park View Hotel for at least
2 14 consecutive days and moved out or checked out before the
3 expiration of 30 consecutive days of occupancy between December
4 2, 2010 and May 1, 2016.

5 24) The Court acknowledges that Defendants would not have entered into the Settlement without
6 adequate assurance that it would not be precluded from trying to contest class certification of
7 the settlement class in the event the Settlement is not consummated. Accordingly, in the event
8 that the approval of the Settlement is reversed on appeal or the Effective Date is not reached for
9 any reason, Defendants shall not be estopped or otherwise precluded from filing a motion
10 to decertify the class or otherwise contesting class certification.

11 25) The Effective Date of the Settlement is September 13, 2018, the date of entry of this final
12 judgment.

13 26) As of the Effective Date, Plaintiffs McClendon and Green and each Settlement Class Member
14 acknowledge full satisfaction of all Settled Claims, and release and forever discharge
15 Defendants from any and all claims alleged in the operative Complaint including the allegations
16 that Defendants' registration practices violated California Civil Code sections 1940.1, 52.1 and
17 Business & Professions Code Section 17200 et seq. during the settlement class period of
18 December 2, 2010 to May 1, 2016.

19 27) The Court awards attorney's fees to Class Counsel the Spencer Law Firm in the amount of
20 \$400,000. This amount shall be fully paid to the Spencer Law Firm. This amount shall be paid
21 within 5 days of the Effective Date. Nothing shall be paid to Victor Jacobovitz or Jacobovitz &
22 Associates.

23 28) The Court awards costs to Class Counsel the Spencer Law Firm in the amount of \$5,091.25.
24 This amount shall be paid within 5 days of the Effective Date.

25 29) An incentive award of \$5,000 is awarded to Representative Plaintiff Pearson McClendon and
26 an incentive award of \$5,000 is awarded to Representative Plaintiff Darryl Green. These
27 amounts shall be paid within 5 days of the Effective Date.

28 30) The Settlement Administrator, CPT Group may reimburse itself actual expenses not to exceed
\$17,500 from the Settlement Fund.

31) The Court approves the payment of \$20,000 to Defense Counsel Daniels, Fine, Israel,

Schonbuch & Lebovits, LLP for the time it expended to create the class list.

1
2 32) Each Settlement Class Member shall be paid his or her his or her pro rata share of the Net
3 Settlement Fund based on their number of Qualifying Stays during the Class Period as
4 calculated pursuant to Section 6.2 of the Settlement Agreement. The payments shall be made
5 by the Settlement Administrator within 15 days of the the Effective Date.

6 33) If any If any checks to the Settlement Class Members remain uncashed after one hundred and
7 eighty (180) days the checks will be void and pursuant to Code of Civil Procedure §384 any
8 unpaid cash plus any accrued interest shall be transmitted as follows shall be transmitted as
9 follows: 25% to the State Treasury for deposit in the Trial Court Improvement Modernization
10 Fund established Section 77029 of the Government Code, and subject to appropriation in the
11 annual Budget Act for the Judicial Counsel to provide grants to trial courts for new or expanded
12 collaborative courts or grants for Sargent Shriver Civil Counsel. Twenty-five percent to the
13 State Treasury for deposit into the Equal Access Fund of the Judicial Branch, to be distributed
14 in accordance with Sections 6216 to 6223, inclusive, of the Business and Professions Code,
15 except that administrative costs shall not be paid to the State Bar or the Judicial Council from
16 this sum. Fifty percent to The Legal Aid Foundation of Los Angeles for providing legal services
17 to the indigent.

18 34) Without affecting the finality of the Judgment in any way, this Court hereby retains continuing
19 jurisdiction pursuant to California Rule of Court 3.769(h) over: (a) implementation of this
20 Settlement and any disputes concerning that implementation; (b) hearing and determining
21 applications for attorneys' fees and costs in the Action; and (c) all parties hereto solely for the
22 purpose of construing, enforcing and administering the Settlement. The time to appeal from the
23 Judgment in this matter shall commence upon its entry.

24 35) In the event that the Settlement does not become effective in accordance with the terms of the
25 Settlement, then Judgment in this matter shall be rendered null and void to the extent provided
26 by and in accordance with the Settlement and shall be vacated and, in such event, all orders
27 entered and releases delivered in connection with Judgment in this matter shall be null and void
28 to the extent provided by and in accordance with the Settlement Agreement, and without
prejudice to the status quo ante rights of Plaintiffs, Settlement Class Members and the

Defendants..

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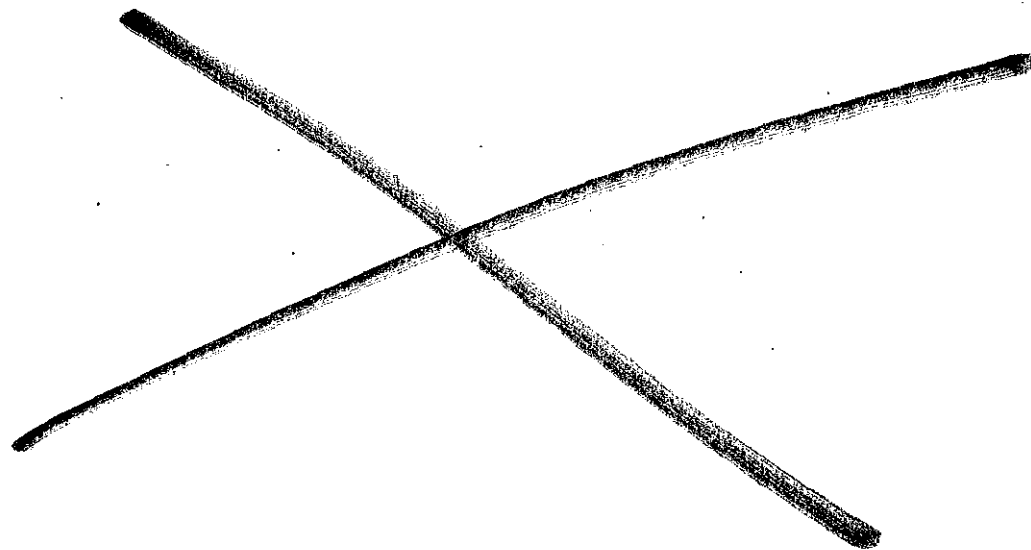
- 36) Neither the Stipulation nor the Settlement, including the agreement by Defendant to stipulate for settlement purposes only to a Settlement Class, nor any act performed or document executed pursuant to or in furtherance of the Stipulation or the Settlement: (a) is or may be deemed to be or may be used as an admission of, or evidence of, the validity of any Settled Claim, or of any wrongdoing or liability of the Defendant; (b) is or may be deemed to be or may be used as an admission of, or evidence of, any fault or omission of the Defendant in any civil, criminal or administrative proceeding in any court, administrative agency or other tribunal; or (c) shall provide a basis for estopping or otherwise preventing Defendant from opposing class certification in the Action or in any other case.
- 37) Notwithstanding the reservation of jurisdiction in Paragraph 34, this is a final and appealable judgment that ends the litigation of all claims alleged in this Action. The Clerk is directed to enter this Judgment forthwith.

IT IS SO ORDERED.

Date: September 13, 2018

KENNETH R. FREEMAN

The Honorable Kenneth R. Freeman
Los Angeles Superior Court



SPENCER LAW FIRM
Jeffrey Spencer, Esq., (State Bar No. 182440)
903 Calle Amanecer, Suite 220
San Clemente, CA 92673
Telephone No: (949) 240-8595
Facsimile No: (949) 240-8515
jps@spencerlaw.net

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COUNTY OF LOS ANGELES

DEC 05 2017

Shirley H. DeLoach Executive Officer/Clerk
By: [Signature] Deputy

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ALEX COHEN and BENJAMIN GAGE)
individually, and as private attorneys general)
and on behalf of all persons similarly situated,)

Case No. BC 611085

Plaintiffs,)

Assigned for All Purposes to:
The Honorable John S. Wiley
Dept. 311

vs.)

CLASS ACTION

CHUCK'S PARKING SERVICE, CHUCK)
PICK, JOEL GROVES and DOES 1)
THROUGH 100, INCLUSIVE,)

~~Proposed~~ ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT; AWARD OF
ATTORNEYS' FEES AND COSTS AND
INCENTIVE AWARDS

Defendants.)

The Application of Representative Plaintiffs Alex Cohen and Benjamin Gage for Orders granting final approval of a class action settlement, award of attorney's fees and costs, incentive award, and entry of judgment pursuant to the terms of the Stipulation of Settlement ("Settlement Agreement"), came on for hearing on October 3, 2017 before the Honorable John S. Wiley of the Los Angeles Superior Court.

Defendant did not oppose Plaintiffs' motion and no Settlement Class Members objected to the Settlement. Based on the oral and written arguments and evidence presented in connection with the motion, the Court makes the following findings of fact:

FINDINGS

- 1) This Order incorporates by reference the definitions in the Stipulation of Settlement, and all terms used herein shall have the same meanings as set forth in the Stipulation.

1 2) Pursuant to Code of Civil Procedure Section 382 and California Rule of Court 3.769, the Court
2 previously conditionally certified, solely for purposes of effectuating the Settlement, a class
3 (the "Settlement Class") as follows:

4 All current and former employees of Chuck's Parking Service Inc.,
5 employed in non-overtime exempt positions in California between
6 February 12, 2012 and the date of preliminary approval of this
7 Settlement by the Court.

8 3) Excluded from the Settlement Class are: all Persons who "opt-out" of the Settlement in
9 accordance with the terms of this Stipulation.

10 4) Regarding the Settlement Class, the Court again finds and concludes solely for purposes of
11 effectuating the Settlement, that:

- 12 a) the Settlement Class is ascertainable;
- 13 b) the Settlement Class is so numerous that joinder of all Settlement Class Members in the
14 Action is impracticable;
- 15 c) there are questions of law and fact common to the Settlement Class that predominate over
16 any individual questions, including whether the Settlement is fair, adequate, and reasonable,
17 and in the best interests of the Settlement Class given the risks and benefits of proceeding to
18 trial on Representative Plaintiffs' claims;
- 19 d) the claims of the Representative Plaintiff are typical of the claims of the Settlement Class;
- 20 e) Representative Plaintiffs and Representative Plaintiffs' Counsel have fairly and adequately
21 represented and protected the interests of the Settlement Class; and a class action is superior
22 to other available methods for the fair and efficient adjudication of the controversy because,
23 among other reasons, (i) settlement of this action is contingent on certification of the
24 Settlement Class, and (ii) certification of the Settlement Class will permit entry of a judgment
25 binding on the Settlement Class.
- 26 f) Certification of the Settlement Class substantially benefits the Court and the litigants.
27 Certification permits approval of the Stipulation, avoiding potentially time-consuming,
28 expensive, and uncertain litigation.
- g) Certification of the Settlement Class also provides relief to all Settlement Class Members,
whom Plaintiffs claim are aggrieved by Defendants' actions.

1 h) Settlement of this case on a class basis permits entry of a judgment binding on Settlement
2 Class Members, thereby avoiding repetitious litigation.

3 **Settlement Notice**

- 4 5) The Court previously approved the form of Settlement Notice and the proposed manner of its
5 distribution to Settlement Class Members.
6 6) The Court again finds that the Settlement Notice reasonably and adequately informed
7 Settlement Class Members of the nature of this Action, the terms of the proposed Settlement,
8 the proposed release of claims, and Settlement Class Members' rights to participate in the
9 Action and Settlement and to exclude themselves or object to the Settlement.
10 7) In compliance with the Preliminary Approval Order, the Class Notice and the Class Action
11 Claim Information Form was mailed by first class mail to Settlement Class Members at their
12 last known addresses on or about July 10, 2017.
13 8) This mailing of the aforementioned documents was the best notice practicable under the
14 circumstances and was reasonably calculated to communicate actual notice of the Settlement to
15 Settlement Class Members.
16 9) The deadline for opting out from or objecting to the Settlement was August 24, 2017. There
17 was an adequate interval between notice and the deadline to permit Settlement Class Members
18 to choose to opt out or to object and to take the necessary actions to effect their decision.
19 10) No Class Members opted out of the Settlement and no Class Members have objected to the
20 settlement.

21 **Fairness of Settlement**

- 22 11) The Settlement is entitled to a presumption of fairness. (See Dunk v. Ford Motor Co. (1996)
23 48 Cal.App.4th 1794, 1801-1802.)
24 a) The Settlement was reached through arm's-length negotiation between the parties and
25 without any collusion between the parties.
26 b) Plaintiff's investigation, discovery, and analysis of discovery have been more than sufficient
27 to allow the Court and counsel to decide on the fairness of this Settlement carefully and with
28 deliberation.
c) Counsel are experienced in similar class action litigation and have recommended approval

of the Settlement.

d) There were no objectors and no requests for exclusion.

12) The consideration to be given to the Settlement Class under the terms of the Stipulation is reasonable considering the strengths and weaknesses of the claims asserted in this Action.

13) Moreover, the Settlement provides fair, reasonable, just and adequate compensation for the dismissal of this action and release of Settlement Class Members' claims in light of the uncertainties and risks of litigation and the delays that would ensue from continued prosecution of this action.

14) Accordingly, the Settlement is fair, adequate, reasonable, and in the best interests of the Settlement Class and its members.

Adequacy of Representation

15) At all times in the prosecution of this action, the negotiation of the Settlement, and its presentation to this Court, the Settlement Class has been adequately represented by Representative Plaintiffs and by competent counsel, Jeffrey Spencer of the Spencer Law Firm and Jeffrey Wilens of the Lakeshore Law Center.

16) Representative Plaintiffs' Counsel have exercised skill and experience in representing the Settlement Class and have adequately represented and protected the interests of the Settlement Class in the action and in negotiating the Settlement.

Attorneys' Fees and Costs

17) The Stipulation provides for payment of up to \$122,500 to Class Counsel as attorney's fees and up to \$10,000 in costs and expenses in the Action, subject to the Court's approval. Defendant has agreed to pay fees, costs and expenses in those amounts in addition to the benefits otherwise payable to the Settlement Class Members under the terms of the Stipulation.

18) Class Counsel have spent or will spend in excess of 250.49 hours working on this case over more than 1 ½ years, a reasonable amount of time given the nature of the case and the claims at issue in the action. Class Counsel's normal hourly rates are \$750 for Jeffrey Spencer and \$750 for Jeffrey Wilens. These hourly rates are within the range of hourly fees reasonably and normally charged by attorneys in this area of comparable experience in cases of similar nature and complexity. Class Counsel also paid litigation costs and expenses in excess of \$6,684.52.

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19) An award of ~~\$22,500~~ in attorneys' fees and \$6,684.52 in costs and expenses is reasonable in light of the contingent nature of Class Counsel fees as well as the novelty and difficulty of questions of law and fact involved in this case and the amount of compensation paid to class members.

Incentive Award

20) The Stipulation provides for a payment of up to \$5,000 as an incentive award to Representative Plaintiff Alex Cohen and for a payment of up to \$5,000 as an incentive award to Representative Plaintiff Benjamin Gage subject to the Court's approval. Defendant has agreed to pay those amounts in addition to the benefits otherwise payable to the Settlement Class Members under the terms of the Stipulation.

21) The payment of an incentive award to a named plaintiff and class representative is often a feature of class action settlements. It is intended to advance public policy by encouraging individuals to come forward and perform their civic duty in protecting the rights of the class and to compensate class representatives for their time, effort and inconvenience. The amount of the payment is reasonable in light of the risks, burdens and responsibilities undertaken by the named Plaintiffs in this Action. The payment of an incentive award in the amount stated above does not unduly favor the Representative Plaintiffs nor is the award paid at the expense of the Settlement Class.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED

22) For purposes of the Action, the Court has subject matter and personal jurisdiction over the parties, including all Settlement Class Members.

23) Consistent with its prior order granting a motion for class certification and pursuant to Code of Civil Procedure § 382 and California Rule of Court 3.769, the Court certifies, solely for purposes of effectuating the Settlement, the Settlement Class, which consists of the following:

All current and former employees of Chuck's Parking Service Inc.,
employed in non-overtime exempt positions in California between
February 12, 2012 and June 8, 2017.

24) The Court acknowledges that Defendants would not have entered into the Settlement without adequate assurance that it would not be precluded from trying to contest class certification of

1 the settlement class in the event the Settlement is not consummated. Accordingly, in the event
2 that the approval of the Settlement is reversed on appeal or the Effective Date is not reached for
3 any reason, Defendant shall not be estopped or otherwise precluded from filing a motion to
4 decertify the class.

5 25) The Effective Date of the Settlement is October 3, 2017.

6 26) As of the Effective Date, Plaintiffs Cohen and Gage and each Settlement Class Member
7 acknowledge full satisfaction of all Settled Claims, and fully, finally and forever release, settle
8 and discharge Defendants CHUCK'S PARKING SERVICE, INC., and its respective agents,
9 attorneys, insurers, past, present and future divisions, affiliates, DBAs (if any), predecessors,
10 successors, shareholders, officers, directors, managers, employees, trustees, representatives,
11 administrators, fiduciaries, assigns, subrogees, executors, partners, parents, subsidiaries,
12 privies, and/or any and all persons and/or corporate entities acting by, through, under or in
13 concert with any of them, and specifically includes Defendants CHUCK PICK and JOEL
14 GROVES from all "Released Claims."

15 27) "Released Claims" means and includes: all claims, debts, liabilities, demands, obligations,
16 guarantees, costs, expenses, attorneys' fees, damages, or causes of action which relate to any
17 and all claims alleged in the operative Complaint filed by the named Representative Plaintiffs,
18 both on their behalf and on behalf of the Class Members in this Action during the Class Period,
19 including the date of preliminary approval of the Settlement under any federal, state or local
20 law, and shall specifically include, claims for: (1) unpaid wages including unpaid overtime
21 wages; (2) failure to provide meal periods (including unpaid meal period premium wages); (3)
22 failure to provide rest periods (including unpaid rest period premium wages); (4) failure to
23 provide accurate wage statements; (5) waiting time penalties pursuant to Labor Code sections
24 201 – 203 et seq.; (6) civil penalties pursuant to PAGA; (7) unreimbursed business expenses
25 (including mileage); and (8) unfair competition in violation of California Business and
26 Professions Code sections 17200, et seq.

27 28) The Court awards attorney's fees to Class Counsel collectively in the amount of ~~\$122,500~~
28 comprised of a fee award to the Spencer Law Firm in the amount of ~~\$106,575~~ ^{\$101,500.00} and a fee award
to the Lakeshore Law Center in the amount of ~~\$15,925~~ ^{\$15,166.67}. These amounts shall be paid within 5

\$116,666.67

days of the Effective Date.

- 1 29) The Court awards costs to Class Counsel collectively in the amount of \$6,684.52 comprised of
2 a cost award to the Spencer Law Firm in the amount of \$6,442.52 and a cost award to the
3 Lakeshore Law Center in the amount of \$242.00. These amounts shall be paid within 5 days
4 of the Effective Date.
- 5 30) An incentive award of \$5,000 is awarded to Representative Plaintiff Alex Cohen and an
6 incentive award of \$5,000 is awarded to Representative Plaintiff Benjamin Gage. These
7 amounts shall be paid within 5 days of the Effective Date.
- 8 31) The Settlement Administrator, CPT Group may reimburse itself actual expenses not to exceed
9 \$13,000 from the Settlement Fund.
- 10 32) Each Settlement Class Member shall be paid his or her his or her pro rata share of the Net
11 Settlement Fund as calculated pursuant to Section IV K of the Settlement Agreement. The
12 payments shall be made by the Settlement Administrator within 15 days of the entry of this
13 Order.
- 14 33) If any Claims Payment check is either not deliverable or is not negotiated within 180 days after
15 it was sent to the Class Member it shall be void and the amount shall be sent to the California
16 State Controller's Office under law as unclaimed property. There will be no reversion to the
17 Defendants.
- 18 34) Without affecting the finality of the Judgment in any way, this Court hereby retains continuing
19 jurisdiction over: (a) implementation of this Settlement and any disputes concerning that
20 implementation; (b) hearing and determining applications for attorneys' fees and costs in the
21 Action; and (c) all parties hereto solely for the purpose of construing, enforcing and
22 administering the Settlement. The time to appeal from the Judgment in this matter shall
23 commence upon its entry.
- 24 35) In the event that the Settlement does not become effective in accordance with the terms of the
25 Settlement, then Judgment in this matter shall be rendered null and void to the extent provided
26 by and in accordance with the Settlement and shall be vacated and, in such event, all orders
27 entered and releases delivered in connection with Judgment in this matter shall be null and void
28 to the extent provided by and in accordance with the Settlement Agreement, and without

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prejudice to the status quo ante rights of Plaintiffs, Settlement Class Members and the Defendants..

36) Neither the Stipulation nor the Settlement, including the agreement by Defendant to stipulate for settlement purposes only to a Settlement Class, nor any act performed or document executed pursuant to or in furtherance of the Stipulation or the Settlement: (a) is or may be deemed to be or may be used as an admission of, or evidence of, the validity of any Settled Claim, or of any wrongdoing or liability of the Defendant; (b) is or may be deemed to be or may be used as an admission of, or evidence of, any fault or omission of the Defendant in any civil, criminal or administrative proceeding in any court, administrative agency or other tribunal; or (c) shall provide a basis for estopping or otherwise preventing Defendant from opposing class certification in the Action or in any other case

IT IS SO ORDERED.

DEC 05 2017

Date: ~~October 3, 2017~~



The Honorable John S. Wiley
Los Angeles Superior Court

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Nickname Franklin | 212
Full Name
Address
Phone 1 Phone 2
Phone 3 Phone 4
In Ref To
Fees Arrg. By billing value on each slip
Expense Arrg. By billing value on each slip
Tax Profile Exempt
Last bill
Last charge 7/21/2021
Last payment Amount \$0.00

Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/9/2018 46993	JPS RP Review Pleading Joint CMC Statement	750.00	0.20	150.00	Billable
10/13/2018 47027	JPS DICT. LETTER DICTATE LETTER to and review Corres. from Co counsel re stat. conf	750.00	0.60	450.00	Billable
10/13/2018 47028	JPS RP Review Pleading Stip. to Continue Stat. Conf.	750.00	0.20	150.00	Billable
10/13/2018 47029	JPS RP Review Pleading Jt. Stat. Conf. Stmt	750.00	0.20	150.00	Billable
10/13/2018 47030	JPS RP Review Pleading complaint	750.00	0.20	150.00	Billable
10/13/2018 47032	JPS RP Review Pleading Minute Order assigning case and designating complex	750.00	0.20	150.00	Billable
10/13/2018 47033	JPS DICT. LETTER DICTATE LETTER to co counsel re status of case	750.00	0.20	150.00	Billable
10/15/2018 47036	JPS Phone Conf. PHONE Conference(s) court re hearing	750.00	0.20	150.00	Billable
10/15/2018 47037	JPS Review Corres review correspondence from Def. and co counsel re hearing	750.00	0.40	300.00	Billable
10/15/2018 47038	JPS RP Review Pleading, notice of ruling	750.00	0.20	150.00	Billable

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Franklin: (continued)

Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/18/2018 47071	JPS Review Corres review correspondence from Def Counsel and Co-Counsel re discovery	750.00	0.40	300.00	Billable
10/22/2018 47082	JPS Review Corres review correspondence from Def re discovery	750.00	0.20	150.00	Billable
11/1/2018 47159	JPS Review Corres review correspondence from co counsel to def. re discovery	750.00	0.20	150.00	Billable
11/7/2018 47230	JPS Review Corres review correspondence from co counsel to def. re service of complaint	750.00	0.20	150.00	Billable
11/9/2018 47246	JPS Review Corres review correspondence form co counsel and def. counsel	750.00	0.40	300.00	Billable
11/9/2018 47250	JPS Review Corres review correspondence additional corres. from Def. counsel and co counsel re meet and confer	750.00	0.40	300.00	Billable
11/16/2018 47301	JPS Review Corres review correspondence from Co Counsel and Def. Counsel re authority for removal	750.00	0.60	450.00	Billable
11/17/2018 47308	JPS Review Corres review correspondence from co counsel and def. counsel re removal	750.00	0.40	300.00	Billable
11/19/2018 47344	JPS RP Review Pleading Def. Answer to Complaint	750.00	0.20	150.00	Billable
11/21/2018 47382	JPS RP Review Pleading Notice of Removal and supporting pleadings	750.00	1.00	750.00	Billable
11/21/2018 47383	JPS RP Review Pleading Def. Civ. Case Cover Sheet	750.00	0.20	150.00	Billable
11/21/2018 47384	JPS RP Review Pleading Def. Cert. of interested parties	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/21/2018 47385	JPS RP Review Pleading Def. Not. of Related Cases	750.00	0.20	150.00	Billable
11/21/2018 47386	JPS Review Corres review correspondence from co counsel and def. counsel re removal	750.00	0.40	300.00	Billable
11/21/2018 47387	JPS discovery discovery review Def. Ins. Docs and collection agreement and corres from Def. Counsel	750.00	0.60	450.00	Billable
11/21/2018 47388	JPS Review Corres review further correspondence from co counsel re removal	750.00	0.40	300.00	Billable
11/21/2018 47389	JPS RP Review Pleading State Ct. Notice of Removal and State Ct. Notice of Stay	750.00	0.40	300.00	Billable
11/21/2018 47398	JPS Review Corres review correspondence from co counsel re removal	750.00	0.20	150.00	Billable
11/26/2018 47403	JPS Review Corres review correspondence from Def. Counsel and co counsel re removal	750.00	0.40	300.00	Billable
11/26/2018 47404	JPS DICT. LETTER DICTATE LETTER to and review corres. from co counsel re remand	750.00	0.40	300.00	Billable
11/26/2018 47406	JPS RP Review Pleading Notice of Assignment	750.00	0.20	150.00	Billable
11/26/2018 47407	JPS RP Review Pleading Notice re ADR	750.00	0.20	150.00	Billable
11/26/2018 47408	JPS RP Review Pleading Docket notices re Conformed copy of Complaint and non-conformed copies of amendments complaint	750.00	0.60	450.00	Billable
11/26/2018 47409	JPS RP Review Pleading Docket notice re non-conformed copy of Answer to Complaint	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/29/2018 47446	JPS RP Review Pleading Judge's Inital Standing Order	750.00	0.20	150.00	Billable
11/29/2018 47447	JPS RP Review Pleading Order setting scheduling conf.	750.00	0.20	150.00	Billable
12/6/2018 47509	JPS Review Corres review correspondence from Def. re motion to dismiss	750.00	0.20	150.00	Billable
12/6/2018 47510	JPS RESEARCH RESEARCH cases cited in meet and confer letter	750.00	0.40	300.00	Billable
12/6/2018 47511	JPS Phone Conf. PHONE Conference(s) co counsel re meet and confer letter re motion to dismiss	750.00	0.40	300.00	Billable
12/6/2018 47515	JPS Review Corres review correspondence from co counsel to Def. re motion to dismiss	750.00	0.20	150.00	Billable
12/7/2018 47516	JPS Review Corres review correspondence from co counsel and def. counsel re motion to dismiss and meet and confer	750.00	1.00	750.00	Billable
12/7/2018 47526	JPS RP Review Pleading further brief and Dec. in support of removal	750.00	0.40	300.00	Billable
12/7/2018 47527	JPS Phone Conf. PHONE Conference(s) co counsel re motion to dismiss	750.00	0.20	150.00	Billable
12/10/2018 47537	JPS Review Corres review correspondence from def. re meet and confer	750.00	0.20	150.00	Billable
12/10/2018 47538	JPS Phone Conf. PHONE Conference(s) co counsel	750.00	0.20	150.00	Billable
12/14/2018 47591	JPS RP Review Pleading Collier Pro Hac Vice App., Collier certs. of good standing NJ and PA	750.00	0.60	450.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/14/2018 47592	JPS RP Review Pleading Notice of deficiency re Collier Pro Hac Vice App.,	750.00	0.20	150.00	Billable
12/14/2018 47593	JPS RP Review Pleading Notice re striking Collier Pro Hac Vice App.,	750.00	0.20	150.00	Billable
12/14/2018 47594	JPS RP Review Pleading Coller re filed pro hac vice app, certs of good standing PA and NJ	750.00	0.60	450.00	Billable
1/3/2019 47697	JPS Review Corres review correspondence from Def. counsel and co counsel re Rule 26 Rpt.	750.00	0.40	300.00	Billable
1/4/2019 47709	JPS Phone Conf. PHONE Conference(s) co counsel re Rule 26 Conf.	750.00	0.20	150.00	Billable
1/4/2019 47751	JPS Review Corres review correspondence from co counsel and Def. Counsel re Rule 26 RPT	750.00	0.80	600.00	Billable
1/6/2019 47752	JPS RP Review Pleading Rule 26 Rpt	750.00	0.20	150.00	Billable
1/16/2019 47835	JPS RP Review Pleading, Scheduling Order, Trial Order and Referral to ADR Order	750.00	0.60	450.00	Billable
1/16/2019 47844	JPS RP Review Pleading and case management order dates	750.00	0.20	150.00	Billable
1/19/2019 47871	JPS Review Corres review correspondence to Def. Counsel re scheduling order	750.00	0.20	150.00	Billable
1/21/2019 47873	JPS Review Corres review correspondence from co counsel and Def. Counsel re initial disclosures and discovery	750.00	0.60	450.00	Billable
1/21/2019 47875	JPS RP Review Pleading, Plaintiff's intiial disclosures	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/21/2019 47876	JPS Review Corres review correspondence, Notice from Court re continued operations	750.00	0.20	150.00	Billable
1/24/2019 47909	JPS Review Corres review correspondence from def counsel and co counsel re motion to strike and discovery	750.00	0.60	450.00	Billable
1/24/2019 47911	JPS Review Corres review correspondence from def. counsel	750.00	0.20	150.00	Billable
2/7/2019 47993	JPS DICT. LETTER DICTATE LETTER to and review corres. from co counsel re mediation	750.00	0.40	300.00	Billable
2/11/2019 48011	JPS Review Corres review correspondence from co counsel re mediators	750.00	0.20	150.00	Billable
2/11/2019 48013	JPS RP Review Pleading proposed amended complaint	750.00	0.20	150.00	Billable
2/11/2019 48023	JPS Review Corres review correspondence from co counsel and Def. re amended complaint and mediator selection	750.00	0.40	300.00	Billable
2/12/2019 48029	JPS Review Corres review correspondence from co counsel and Def. Counsel re amended complaint and mediation	750.00	0.40	300.00	Billable
2/12/2019 48030	JPS RP Review Pleading Stip. to file FAC and proposed order	750.00	0.40	300.00	Billable
2/13/2019 48039	JPS RP Review Pleading Order re amended complaint	750.00	0.20	150.00	Billable
2/13/2019 48040	JPS RP Review Pleading request for issuance of summons re amended complaint	750.00	0.20	150.00	Billable
2/13/2019 48054	JPS RP Review Pleading Order granting leave to file amended complaint	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/13/2019 48055	JPS RP Review Pleading request for issuance of summons	750.00	0.20	150.00	Billable
2/13/2019 48056	JPS RP Review Pleading summons	750.00	0.20	150.00	Billable
2/13/2019 48057	JPS RP Review Pleading First Amended Complaint	750.00	0.20	150.00	Billable
2/26/2019 48125	JPS Review Corres review correspondence, meet and confer to Def. Counsel	750.00	0.20	150.00	Billable
2/27/2019 48135	JPS DICT. LETTER Letter to and review correspondence to and from Def. Counsel and co counsel re discovery, motion to dismiss and settlement	750.00	1.00	750.00	Billable
2/27/2019 48136	JPS Phone Conf. PHONE Conference(s) co counsel re discovery	750.00	0.20	150.00	Billable
3/7/2019 48162	JPS Review Corres review correspondence from co counsel and Def. Counsel re discovery and settlement discussions	750.00	1.00	750.00	Billable
3/8/2019 48168	JPS RP Review Pleading Notice of Assignment of mediator	750.00	0.20	150.00	Billable
3/21/2019 48278	JPS RP Review Pleading notice re assignment of mediator	750.00	0.20	150.00	Billable
4/10/2019 48396	JPS Phone Conf. PHONE Conference(s) co counsel re policy limits demand	750.00	0.20	150.00	Billable
4/10/2019 48397	JPS Review Corres review correspondence from co counsel, carrier and def. counsel re policy limits demand	750.00	0.60	450.00	Billable
4/10/2019 48405	JPS Phone Conf. PHONE Conference(s) co counsel re settlement demand	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/15/2019	JPS 48440 Review Corres review correspondence from co counsel re settlement demand and discovery conf.	750.00	0.20	150.00	Billable
4/15/2019	JPS 48441 Review Corres review correspondence from Def. counsel re discovery conf.	750.00	0.20	150.00	Billable
4/16/2019	JPS 48460 Review Corres review correspondence from co counsel to Def. re phone conf.	750.00	0.20	150.00	Billable
4/17/2019	JPS 48467 Review Corres review correspondence from co counsel and Def. Counsel re conference	750.00	0.20	150.00	Billable
4/17/2019	JPS 48468 Review Corres review correspondence from co counsel to court re informal discovery conference	750.00	0.20	150.00	Billable
4/24/2019	JPS 48539 Review Corres review correspondence from co counsel re Discovery statement	750.00	0.20	150.00	Billable
4/24/2019	JPS 48540 Review Corres review correspondence from Def. counsel re Discovery statement	750.00	0.20	150.00	Billable
4/24/2019	JPS 48541 Review Corres review correspondence from Court re Discovery conference	750.00	0.20	150.00	Billable
4/25/2019	JPS 48551 Review Corres review correspondence six letters from co counsel and Def. Counsel re discovery, depo. scheduling and class cert. motion	750.00	1.00	750.00	Billable
4/29/2019	JPS 48584 Review Corres review correspondence from Def. Counsel and Co counsel re meet and confer conference	750.00	0.40	300.00	Billable
4/29/2019	JPS 48590 Review Corres review correspondence from Def. Counsel memorializing meet and confer conf.	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/29/2019	JPS 48591 Review Corres review correspondence from Def. Counsel to Court re discovery conference	750.00	0.20	150.00	Billable
5/1/2019	JPS 48628 RP Review Pleading motion to supplement	750.00	0.20	150.00	Billable
5/1/2019	JPS 48629 Review Corres review correspondence from court and def. counsel re discovery conference	750.00	0.40	300.00	Billable
5/1/2019	JPS 48630 RP Review Pleading supplemental discovery statement	750.00	0.20	150.00	Billable
5/1/2019	JPS 48631 discovery discovery review Def. Supplemental resp. to RFP and interrogatories	750.00	0.40	300.00	Billable
5/3/2019	JPS 48632 Review Corres review correspondence from Def. re discovery responses	750.00	0.20	150.00	Billable
5/3/2019	JPS 48633 Phone Conf. Phone conf. co counsel re Def. re discovery responses and discovery conf.	750.00	0.20	150.00	Billable
5/3/2019	JPS 48643 Phone Conf. PHONE Conference(s) co counsel re discovery conference	750.00	0.20	150.00	Billable
5/3/2019	JPS 48644 RP Review Pleading Court minutes from discovery confernece	750.00	0.20	150.00	Billable
5/3/2019	JPS 48645 Review Corres review correspondence from Def. Counsel and Co Counsel re discovery and deposition issues	750.00	0.60	450.00	Billable
5/6/2019	JPS 48657 RP Review Pleading Minute Order on discovery motion	750.00	0.20	150.00	Billable
5/6/2019	JPS 48658 Phone Conf. Phone Conf. co counsel Minute Order on discovery motion	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/6/2019 48663	JPS Review Corres review correspondence from co counsel and def. counsel re discovery following court ruling	750.00	0.40	300.00	Billable
5/6/2019 48664	JPS Review Corres review correspondence from def. counsel to court re plaintiff depo. date	750.00	0.20	150.00	Billable
5/7/2019 48675	JPS Review Corres review correspondence - from co counsel and def. counsel re discovery issues	750.00	0.60	450.00	Billable
5/9/2019 48688	JPS DICT. LETTER DICTATE LETTER to and review corres from Def. counsel and co counsel re protective order	750.00	0.40	300.00	Billable
5/9/2019 48689	JPS Prep. Pleading Prepare Pleading review and sign stipulation re protective order	750.00	0.20	150.00	Billable
5/10/2019 48702	JPS RP Review Pleading Stipulated protective order and proposed order	750.00	0.40	300.00	Billable
5/15/2019 48720	JPS Review Corres review correspondence from co counsel and def. counsel re discovery	750.00	0.40	300.00	Billable
5/16/2019 48734	JPS Review Corres Review Corres from co counsel and def. counsel re deposition and discovery disputes	750.00	0.80	600.00	Billable
5/16/2019 48738	JPS Review Corres review correspondence from Def. Counsel re depo. notice	750.00	0.20	150.00	Billable
5/16/2019 48739	JPS discovery review depo. notice	750.00	0.20	150.00	Billable
5/16/2019 48740	JPS Phone Conf. Phone Conf. Co Counsel re depo. notice	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/21/2019 48773	JPS RP Review Pleading ex parte to change class cert filing deadlines and proposed order	750.00	0.40	300.00	Billable
5/23/2019 48792	JPS Review Corres review correspondence from co counsel	750.00	0.20	150.00	Billable
5/29/2019 48828	JPS Phone Conf. PHONE Conference(s) co counsel re discovery conference and discovery	750.00	0.40	300.00	Billable
5/29/2019 48830	JPS RP Review Pleading Def. Statement for Discovery Conf.	750.00	0.20	150.00	Billable
5/30/2019 48851	JPS Review Corres review correspondence from Def. Counsel and Co Counsel re deposition	750.00	0.60	450.00	Billable
5/31/2019 48867	JPS Review Corres review correspondence from co counsel and Def. Counsel re discovery dispute	750.00	0.40	300.00	Billable
5/31/2019 48868	JPS Review Corres review correspondence from co counsel to court re discovery dispute resolution	750.00	0.20	150.00	Billable
6/4/2019 48896	JPS discovery discovery review Plaintiff document production	750.00	0.20	150.00	Billable
6/4/2019 48897	JPS Phone Conf. Phone Conf. co counsel re Plaintiff document production	750.00	0.20	150.00	Billable
6/4/2019 48904	JPS Review Corres review correspondence to class member	750.00	0.20	150.00	Billable
6/5/2019 48916	JPS Review Corres review correspondence from co counsel to class member	750.00	0.20	150.00	Billable
6/7/2019 48925	JPS Prep. Pleading Prepare Pleading revise draft Second Amended Complaint and dictate letter to and review corres. from co counsel	750.00	0.60	450.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/28/2019 49095	JPS Review Corres review correspondence from co counsel and def. counsel re depositions	750.00	0.60	450.00	Billable
7/2/2019 49143	JPS Review Corres review correspondence from co counsel and Def. counsel re discovery and motion deadlines	750.00	0.40	300.00	Billable
7/2/2019 49144	JPS Review Corres review correspondence from co counsel and Def. counsel re settlement discussions	750.00	0.40	300.00	Billable
7/10/2019 49193	JPS Phone Conf. PHONE Conference(s) co counsel re policy limits demand	750.00	0.20	150.00	Billable
7/11/2019 49194	JPS Review Corres review correspondence from co counsel to def. re policy limits demand	750.00	0.20	150.00	Billable
7/31/2019 49410	JPS Review Corres review correspondence from Def. Counsel re settlement discussions and mediation	750.00	0.20	150.00	Billable
7/31/2019 49411	JPS Review Corres review correspondence from co counsel to Def. Counsel re settlement discussions and mediation	750.00	0.20	150.00	Billable
8/1/2019 49423	JPS Phone Conf. PHONE Conference(s) re policy limits demand and settlement discussions	750.00	0.40	300.00	Billable
8/5/2019 49461	JPS Phone Conf. PHONE Conference(s) co counsel re mediation	750.00	0.20	150.00	Billable
8/5/2019 49463	JPS RP Review Pleading, Def. Answer to complaint	750.00	0.20	150.00	Billable
8/13/2019 49541	JPS RP Review Pleading order setting settlement conference	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/13/2019 49542	JPS Review Corres Review corres to clients re order setting settlement conference	750.00	0.20	150.00	Billable
8/18/2019 49549	JPS Prep. Pleading Prepare Pleading, motion for class certification	750.00	1.60	1,200.00	Billable
8/18/2019 49550	JPS DICT. LETTER Letters to and review corres. from co counsel re motion for class certification	750.00	0.60	450.00	Billable
8/22/2019 49606	JPS Phone Conf. PHONE Conference(s) co counsel re settlement conf.	750.00	0.20	150.00	Billable
8/29/2019 49664	JPS Review Corres review correspondence from Def. Counsel re settlement discussions	750.00	0.20	150.00	Billable
9/3/2019 49685	JPS Review Corres review correspondence from co counsel re settlement conf. statement and addendum	750.00	0.20	150.00	Billable
9/3/2019 49686	JPS Prep. Pleading review and revise settlement conf. statement and addendum	750.00	0.40	300.00	Billable
9/3/2019 49687	JPS DICT. LETTER Letter to co counsel re settlement conf. statement and addendum	750.00	0.40	300.00	Billable
9/4/2019 49694	JPS Phone Conf. Phone Conf. co counsel re Def. Settlement Conf. Statement	750.00	0.20	150.00	Billable
9/4/2019 49697	JPS RP Review Pleading, Def. Settlement Conf. Statement	750.00	0.20	150.00	Billable
9/5/2019 49711	JPS Review Corres review correspondence from Def. Counsel re settlement conf.	750.00	0.20	150.00	Billable
9/10/2019 49739	JPS Phone Conf. PHONE Conference(s) co counsel re settlement conference	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/11/2019 49750	JPS HEARING Travel to and attend COURT HEARING Settlement Conference	750.00	6.60	4,950.00	Billable
9/11/2019 49751	JPS Phone Conf. PHONE Conference(s) co counsel re settlement conference and coverage analyiss	750.00	0.80	600.00	Billable
9/11/2019 49759	JPS Review Corres review correspondence to Def. Counsel re depositions and amendment to complaint	750.00	0.20	150.00	Billable
9/18/2019 49819	JPS Phone Conf. PHONE Conference(s) co counsel re settlement discussions and depositions and amended complaint and call re assignment of rights offer	750.00	0.20	150.00	Billable
9/20/2019 49829	JPS Phone Conf. PHONE Conference(s) co counsel re amended complaint and discovery	750.00	0.20	150.00	Billable
9/20/2019 49832	JPS Review Corres review correspondence from co counsel to Def. re stipulation	750.00	0.20	150.00	Billable
9/24/2019 49866	JPS Phone Conf. PHONE Conference(s) co counsel re conversations with Def. Counsel	750.00	0.20	150.00	Billable
9/26/2019 49898	JPS Review Corres review correspondence from Def. Counsel and Co-Counsel re amended complaint and class cert. motion	750.00	0.40	300.00	Billable
9/27/2019 49909	JPS Review Corres review correspondence from co counsel and Def. Counsel re stipulation and depositions	750.00	0.40	300.00	Billable
9/27/2019 49910	JPS Review Corres review correspondence further correspondence from Def. Counsel and Co Counsel re: depositions and stip.	750.00	0.40	300.00	Billable
9/27/2019 49924	JPS Review Corres review correspondence from Def. Counsel re service and depo. dates	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/27/2019 49926	JPS Review Corres review correspondence further exchanges with Def. Counsel re amended complaint and discovery	750.00	0.80	600.00	Billable
9/29/2019 49939	JPS RP Review Pleading Motion to Amend schedule and file 3AC and proposed order	750.00	0.40	300.00	Billable
9/30/2019 49942	JPS Review Corres review correspondence from Def. Counsel, co counsel and Def. Counsel re motion to amend, depo. dates and stipulation	750.00	0.60	450.00	Billable
9/30/2019 49945	JPS RP Review Pleading Def. Revisions to Stipulation continuing cert. motion dates	750.00	0.20	150.00	Billable
9/30/2019 49946	JPS RP Review Pleading Pltf.Revisions to Stipulation continuing cert. motion dates	750.00	0.20	150.00	Billable
9/30/2019 49947	JPS Review Corres Review corres. from co counsel and Def. Counsel re revisions to Stipulation continuing cert. motion dates	750.00	0.40	300.00	Billable
9/30/2019 49948	JPS RP Review Pleading filed Stipulation re class certification dates and review proposed order	750.00	0.40	300.00	Billable
10/2/2019 49995	JPS Review Corres review correspondence from Def. Counse re depositions	750.00	0.60	450.00	Billable
10/3/2019 49993	JPS Review Corres review correspondence exchange between co counsel and Def. Counsel re depositions	750.00	0.60	450.00	Billable
10/3/2019 49994	JPS discovery discovery, review Depo. Notices	750.00	0.60	450.00	Billable
10/3/2019 49999	JPS Phone Conf. Phone conf. co counsel re depositions	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/4/2019	JPS 50004 Review Corres review correspondence from Def. Counsel Coller to court clerk re stipulation	750.00	0.20	150.00	Billable
10/4/2019	JPS 50005 Review Corres review correspondence from Def. Counsel Taylor to court clerk re stipulation	750.00	0.20	150.00	Billable
10/4/2019	JPS 50010 Review Corres review correspondence from court clerk re stipulation	750.00	0.20	150.00	Billable
10/7/2019	JPS 50022 Review Corres Review Corres. from Def. Counsel and Co Counsel re telephonic conference	750.00	0.60	450.00	Billable
10/7/2019	JPS 50023 Review Corres Review Corres. from Court re telephonic conference	750.00	0.20	150.00	Billable
10/7/2019	JPS 50024 Phone Conf. PHONE Conference(s) Telephonic Conf. with Court re discovery	750.00	0.40	300.00	Billable
10/8/2019	JPS 50030 Review Corres review correspondence from Def. Counsel to court re status of stip. and order	750.00	0.20	150.00	Billable
10/8/2019	JPS 50031 Review Corres review correspondence from court re status of stip. and order	750.00	0.20	150.00	Billable
10/8/2019	JPS 50032 Review Corres review correspondence from Def. Counsel and Co Counsel re depositions and Def. Ex Parte	750.00	0.60	450.00	Billable
10/9/2019	JPS 50043 Phone Conf. PHONE Conference(s) Def. Counsel Coller re Def. Ex. Parte	750.00	0.20	150.00	Billable
10/9/2019	JPS 50051 Phone Conf. PHONE Conference(s) co counsel re Def. Exl. Parte	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/9/2019	JPS 50055 Phone Conf. PHONE Conference(s) Def. counsel re Def. Exl. Parte	750.00	0.20	150.00	Billable
10/9/2019	JPS 50056 Review Corres Rev. corres. from Def. counsel re Def. Exl. Parte	750.00	0.20	150.00	Billable
10/9/2019	JPS 50057 Review Corres review correspondence from Def. Counsel and Co counsel re depositions	750.00	0.60	450.00	Billable
10/9/2019	JPS 50061 Review Corres review correspondence from Def. Counsel re ex parte	750.00	0.20	150.00	Billable
10/9/2019	JPS 50062 Review Corres review correspondence from co counsel and Def. re expert	750.00	0.40	300.00	Billable
10/9/2019	JPS 50063 discovery Review expert, CV and info.	750.00	0.20	150.00	Billable
10/15/2019	JPS 50069 RP Review Pleading Order amending class cert. briefing deadlines	750.00	0.20	150.00	Billable
10/15/2019	JPS 50080 Phone Conf. PHONE Conference(s) co counsel re order re class cert. dates and pending depositions	750.00	0.20	150.00	Billable
10/18/2019	JPS 50103 Phone Conf. PHONE Conference(s) co counsel re depositions	750.00	0.40	300.00	Billable
10/21/2019	JPS 50120 Review Corres review correspondence from Def. Counsel to meet and confer re discovery issues and co counsel's response	750.00	0.40	300.00	Billable
10/21/2019	JPS 50121 Review Corres review correspondence from Def. Counsel re scheduling meet and confer conf.	750.00	0.40	300.00	Billable
10/21/2019	JPS 50122 Phone Conf. PHONE Conference(s) co counsel re discovery issues	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/28/2019	JPS 50185 Review Corres review correspondence from Def. Counsel re case scheduling issues	750.00	0.20	150.00	Billable
10/30/2019	JPS 50205 Review Corres review correspondence from Def. Counsel and co counsel re proposed stip.	750.00	0.40	300.00	Billable
10/30/2019	JPS 50206 RP Review Pleading proposed stip. re dates	750.00	0.20	150.00	Billable
10/30/2019	JPS 50207 discovery discovery, review portions of dep. transcript	750.00	0.20	150.00	Billable
10/30/2019	JPS 50213 RP Review Pleading stip. to amend case management dates	750.00	0.20	150.00	Billable
10/30/2019	JPS 50214 RP Review Pleading proposed order amending case management dates	750.00	0.20	150.00	Billable
11/1/2019	JPS 50234 Review Corres review correspondence exchanges with co counsel and Def. counsel re depositions and discovery	750.00	0.80	600.00	Billable
11/1/2019	JPS 50235 discovery discovery review Munson Docs. produced	750.00	0.20	150.00	Billable
11/1/2019	JPS 50236 RP Review Pleading Munson Objections to depo. notice	750.00	0.20	150.00	Billable
11/1/2019	JPS 50237 RP Review Pleading Objections to expert depo. notice	750.00	0.20	150.00	Billable
11/1/2019	JPS 50249 Review Corres review correspondence from Def. counsel re payment to expert for depo	750.00	0.20	150.00	Billable
11/1/2019	JPS 50250 Review Corres review further correspondence from Def. counsel re payment to expert for depo	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/4/2019	JPS 50271 Review Corres review correspondence from Def. Counsel re expert depo.	750.00	0.20	150.00	Billable
11/4/2019	JPS 50272 Review Corres review correspondence from co Counsel re expert depo.	750.00	0.20	150.00	Billable
11/7/2019	JPS 50303 Phone Conf. PHONE Conference(s) co counsel re depositions	750.00	0.20	150.00	Billable
11/7/2019	JPS 50331 discovery discovery review Munson document production	750.00	0.20	150.00	Billable
11/8/2019	JPS 50330 RP Review Pleading Order amending schd. ord. and granting leave to file amend. comp.	750.00	0.20	150.00	Billable
11/9/2019	JPS 50337 RP Review Pleading Third Amended Complaint filed	750.00	0.20	150.00	Billable
11/9/2019	JPS 50338 RP Review Pleading request for summons for Third Amended Complaint	750.00	0.20	150.00	Billable
11/12/2019	JPS 50349 RP Review Pleading Notice of Deficiencies re summons	750.00	0.20	150.00	Billable
11/17/2019	JPS 50395 Review Corres review correspondence from co counsel re Joint CMC statement	750.00	0.20	150.00	Billable
11/19/2019	JPS 50394 Review Corres review correspondence from co counsel and Def. counsel re phone conf.	750.00	0.20	150.00	Billable
11/20/2019	JPS 50386 Phone Conf. PHONE Conference(s) co counsel re Def. issues with complaint, representation of Defs. and discovery issues	750.00	0.20	150.00	Billable
11/20/2019	JPS 50387 Review Corres Review corres from Def. counsel issues with complaint, representation of Defs. and discovery issues	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/20/2019 50388	JPS Review Corres Review corres from co counsel re meet and confer conference	750.00	0.20	150.00	Billable
11/22/2019 50428	JPS RP Review Pleading Third Amended Complaint and Summons issued	750.00	0.20	150.00	Billable
11/22/2019 50433	JPS Review Corres review correspondence from Def. Counsel and Co Counsel re stipulation re Def. Answer to third Amended complaint	750.00	0.40	300.00	Billable
11/22/2019 50434	JPS RP stipulation re Def. Answer to third Amended complaint	750.00	0.20	150.00	Billable
11/22/2019 50548	JPS RP Review Pleading Stip. re 3AC	750.00	0.20	150.00	Billable
11/22/2019 50549	JPS RP Review Pleading Proposed Order. re 3AC	750.00	0.20	150.00	Billable
12/5/2019 50543	JPS RP Review Pleading Order granting stip. re 3AC	750.00	0.20	150.00	Billable
12/17/2019 50641	JPS Review Corres review correspondence from Def. Counsel and co counsel re CMC Statement	750.00	0.40	300.00	Billable
12/24/2019 50710	JPS Review Corres review correspondence from co counsel re status conf. statement and scheduling order	750.00	0.20	150.00	Billable
12/24/2019 50711	JPS RP Jt. status conf. statement and scheduling order	750.00	0.40	300.00	Billable
1/6/2020 50814	JPS Review Corres review correspondence from co counsel and Def. re scheduling order	750.00	0.40	300.00	Billable
1/6/2020 50815	JPS RP review pleading - scheduling order	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/10/2020 50890	JPS RP Review Pleading Jt. Status Conf. Statement	750.00	0.20	150.00	Billable
1/10/2020 50891	JPS RP Review Pleading Revised Scheduling Orderr	750.00	0.20	150.00	Billable
1/29/2020 51150	JPS Prep. Pleading Prepare Pleading, revise Class Cert. Reply	750.00	0.40	300.00	Billable
1/29/2020 51151	JPS DICT. LETTER Letter to co counsel re revisions to Class Cert. Reply	750.00	0.20	150.00	Billable
1/29/2020 51154	JPS Phone Conf. PHONE Conference(s) co counsel re reply brief	750.00	0.20	150.00	Billable
2/9/2020 51260	JPS Prep. Pleading Prepare Pleading, revise opp, to motion to dismiss	750.00	0.60	450.00	Billable
2/10/2020 51266	JPS Review Corres review correspondence from co counsel re revisions to motion to dismiss	750.00	0.20	150.00	Billable
2/12/2020 51289	JPS RP Review Pleading Opposition to motion to dismiss	750.00	0.20	150.00	Billable
2/12/2020 51290	JPS DICT. LETTER Letter to co counsel re Opposition to motion to dismiss	750.00	0.20	150.00	Billable
2/14/2020 51336	JPS Review Corres review correspondence from co counsel to clients re status of case and class cert. motion	750.00	0.20	150.00	Billable
3/5/2020 51487	JPS RP Review Pleading Notice of taking motion to dismiss under submission	750.00	0.20	150.00	Billable
3/9/2020 51513	JPS RP Review Pleading Order denying motion to dismiss	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/11/2020 51552	JPS RP Review Pleading, notice from the court re class cert. hearing	750.00	0.20	150.00	Billable
3/12/2020 51555	JPS RP Review Pleading Notice continuing class cert. motion	750.00	0.20	150.00	Billable
3/12/2020 51556	JPS Phone Conf. Phone Conf. co counsel re class cert. motion and arbitration clause	750.00	0.20	150.00	Billable
3/17/2020 51588	JPS Review Corres review correspondence from Def. Counsel and co counsel re settlement phone conf.	750.00	0.40	300.00	Billable
3/19/2020 51611	JPS RP Review Pleading Def. response re arbitration	750.00	0.20	150.00	Billable
3/19/2020 51612	JPS Phone Conf. Co Counsel re Def. response court order they file a motion to compel arb. or notice they are not moving to compel arbitratiion	750.00	0.20	150.00	Billable
6/30/2020 53107	JPS RP Review Pleading, Supplement to Class Cert. Motion	750.00	0.20	150.00	Billable
7/2/2020 53132	JPS RP Review Pleading Order from court settling class cert. hearing	750.00	0.20	150.00	Billable
7/2/2020 53133	JPS Phone Conf. Phone conf. co course re Order from court settling class cert. hearing	750.00	0.20	150.00	Billable
7/3/2020 53129	JPS Phone Conf. PHONE Conference(s) co counsel re changes to scheduling order	750.00	0.20	150.00	Billable
7/3/2020 53134	JPS Review Corres review correspondence exchange from co counsel and Def. Counsel re revising scheduling order	750.00	0.40	300.00	Billable
7/3/2020 53135	JPS RP Review Pleading, scheduling order	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/3/2020 53138	JPS Review Corres review correspondence further exchange with Def. Counsel re revising case management schedule	750.00	0.20	150.00	Billable
7/3/2020 53139	JPS Review Corres review correspondence to Def. Counsel re Def. continuing improper credit reporting	750.00	0.20	150.00	Billable
7/4/2020 53147	JPS DICT. LETTER DICTATE LETTER to and review corres. from co counsel re new cases filed against Midwest and review cases	750.00	0.40	300.00	Billable
7/13/2020 53156	JPS Review Corres review correspondence form Def. counsel re settlement offer	750.00	0.20	150.00	Billable
7/13/2020 53157	JPS Review Corres review correspondence form co counsel to Def. counsel re settlement offer	750.00	0.20	150.00	Billable
7/13/2020 53158	JPS Phone Conf. Phone Conf co counsel re settlement offer	750.00	0.20	150.00	Billable
7/16/2020 53249	JPS RP Review Pleading revised scheduling order	750.00	0.20	150.00	Billable
7/16/2020 53250	JPS RP Review Pleading stip re revised scheduling order	750.00	0.20	150.00	Billable
7/16/2020 53251	JPS Review Corres Review Corres. to Def. counsel re stip and revised scheduling order	750.00	0.20	150.00	Billable
7/22/2020 53323	JPS Review Corres Review Corres. from co counsel to Def. re stip.	750.00	0.20	150.00	Billable
7/29/2020 53387	JPS Review Corres review correspondence from mediator	750.00	0.20	150.00	Billable
7/29/2020 53391	JPS Review Corres review correspondence from co counsel and mediator	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/11/2020	JPS 53531 Review Corres review correspondence from co counsel to mediator re mediation	750.00	0.20	150.00	Billable
8/11/2020	JPS 53532 Review Corres review correspondence from mediator re mediation	750.00	0.20	150.00	Billable
8/11/2020	JPS 53533 Review Corres review correspondence from Def. Counsel to mediator re mediation	750.00	0.20	150.00	Billable
8/12/2020	JPS 53534 Review Corres review correspondence from Def. Counsel re mediation	750.00	0.20	150.00	Billable
8/13/2020	JPS 53535 Review Corres review correspondence from Mediator re mediation	750.00	0.20	150.00	Billable
8/13/2020	JPS 53536 Review Corres review correspondence from Def. Counsel to Mediator re mediation and scheduling order	750.00	0.20	150.00	Billable
8/14/2020	JPS 53537 Review Corres review correspondence from Mediator re mediation	750.00	0.20	150.00	Billable
8/17/2020	JPS 53538 Review Corres review correspondence from co counsel to mediator re mediation	750.00	0.20	150.00	Billable
8/18/2020	JPS 53540 Review Corres review correspondence from Hiscox re policy	750.00	0.20	150.00	Billable
8/18/2020	JPS 53541 Review Corres review correspondence exchange from co counsel, mediator and Def. Counsel re mediation and mediation issues	750.00	0.80	600.00	Billable
8/18/2020	JPS 53543 Phone Conf. PHONE Conference(s) co counsel re mediation	750.00	0.20	150.00	Billable
8/18/2020	JPS 53548 Review Corres review correspondence from Def. Counsel re mediatiion	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/18/2020 53549	JPS DICT. LETTER Letter to Def. Counsel re mediation	750.00	0.20	150.00	Billable
8/18/2020 53550	JPS Review Corres review correspondence from Def. Counsel re mediaton	750.00	0.20	150.00	Billable
8/18/2020 53551	JPS Review Corres review correspondence from mediator re Hiscox counsel's attendance at mediation	750.00	0.20	150.00	Billable
8/18/2020 53552	JPS RP Review Pleading, Plaintiff's mediation brief	750.00	0.20	150.00	Billable
8/24/2020 53567	JPS HEARING COURT HEARING - Mediation via zoom	750.00	6.00	4,500.00	Billable
8/25/2020 53581	JPS Review Corres review correspondence from mediator re mediation	750.00	0.20	150.00	Billable
8/25/2020 53584	JPS Phone Conf. PHONE Conference(s) co counsel re mediation	750.00	0.20	150.00	Billable
8/26/2020 53586	JPS Review Corres review correspondence from co counsel to mediator re mediation fees	750.00	0.20	150.00	Billable
8/27/2020 53597	JPS Review Corres review correspondence from co counsel and mediator re mediation	750.00	0.20	150.00	Billable
8/31/2020 53616	JPS Review Corres review correspondence from Def. re stip. to extend dates	750.00	0.20	150.00	Billable
8/31/2020 53617	JPS Review Corres review correspondence from co counsel to def. counsel re stip. to extend dates	750.00	0.20	150.00	Billable
8/31/2020 53618	JPS Review Corres review correspondence from co counsel and Def. Counsel re ex parte	750.00	0.40	300.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/31/2020	JPS 53619 Phone Conf. PHONE Conference(s) co counsel re ex parte	750.00	0.20	150.00	Billable
9/1/2020	JPS 53625 RP Review Pleading Def. ex parte	750.00	0.20	150.00	Billable
9/1/2020	JPS 53626 RP Review Pleading Def. proposed order extending deadlines	750.00	0.20	150.00	Billable
9/1/2020	JPS 53629 Review Corres review correspondence from Def. re ex parte	750.00	0.20	150.00	Billable
9/2/2020	JPS 53633 DICT. LETTER DICTATE LETTER to and review corres. from co counsel re opp. to ex parte	750.00	0.20	150.00	Billable
9/2/2020	JPS 53634 Prep. Pleading Prepare Pleading opposition to ex parte	750.00	3.00	2,250.00	Billable
9/2/2020	JPS 53635 Review Corres review correspondence from co counsel and mediator re mediaiton	750.00	0.60	450.00	Billable
9/2/2020	JPS 53644 Review Corres review correspondence from mediator	750.00	0.20	150.00	Billable
9/8/2020	JPS 53672 Review Corres review correspondence from mediator	750.00	0.20	150.00	Billable
9/8/2020	JPS 53673 Review Corres review correspondence from co counsel to mediator re mediation	750.00	0.20	150.00	Billable
9/9/2020	JPS 53685 Review Corres review correspondence from co counsel re mediation	750.00	0.20	150.00	Billable
9/9/2020	JPS 53686 Review Corres review correspondence from mediator re mediation	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/9/2020 53689	JPS Review Corres review correspondence exchange from co counsel and mediator re settlement discussions	750.00	0.20	150.00	Billable
9/10/2020 53697	JPS Review Corres review correspondence from co counsel and mediator re settlement demand	750.00	0.20	150.00	Billable
9/10/2020 53705	JPS Review Corres review correspondence from Def. Counsel to clerk re status of ex parte	750.00	0.20	150.00	Billable
9/11/2020 53713	JPS Review Corres review correspondence from Def. Counsel and co counsel re MSJ	750.00	0.40	300.00	Billable
9/11/2020 53714	JPS Phone Conf. Phone Conf. co counsel re MSJ	750.00	0.40	300.00	Billable
9/11/2020 53715	JPS Review Corres review correspondence to and from Def. Counsel re meet and confer re MSJ and discovery	750.00	0.60	450.00	Billable
9/14/2020 53723	JPS Review Corres review correspondence to Def. Counsel re depositions	750.00	0.20	150.00	Billable
9/14/2020 53729	JPS discovery discovery review depo. notices	750.00	0.20	150.00	Billable
9/15/2020 53738	JPS RP Review Pleading, mediation report	750.00	0.20	150.00	Billable
9/16/2020 53746	JPS RP Review Pleading Order denying def. ex parte to continue MSJ	750.00	0.20	150.00	Billable
9/16/2020 53747	JPS Phone Conf. Phone Conf. co counsel re Order denying def. ex parte to continue MSJ	750.00	0.20	150.00	Billable
9/16/2020 53754	JPS Review Corres review correspondence to Def. Counsel re hearing dates and stip. to modify scheduling order	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/16/2020 53761	JPS Review Corres review correspondence from Def. Counsel to clerk re ex parte	750.00	0.20	150.00	Billable
9/19/2020 53803	JPS Phone Conf. PHONE Conference(s) co counsel re MSJ	750.00	0.20	150.00	Billable
9/19/2020 53804	JPS RP Review Pleading, Notice of MSJ, Points and Authorities, Dec., Ex.A-F and proposed Judgment	750.00	1.00	750.00	Billable
9/21/2020 53830	JPS Phone Conf. PHONE Conference(s) co counsel re motion to modify scheduling order	750.00	0.20	150.00	Billable
9/21/2020 53831	JPS RP Review Pleading, motion to modify scheduling order, Wilens Dec. and proposed order	750.00	0.60	450.00	Billable
9/21/2020 53832	JPS DICT. LETTER Letter to Court re courtesy copy of motion to modify scheduling order	750.00	0.40	300.00	Billable
9/23/2020 53865	JPS Review Corres review correspondence from Mediator re Def. request for ext. to respond to settlement demand	750.00	0.20	150.00	Billable
9/23/2020 53866	JPS Review Corres review correspondence from co counsel to Def. re Def. request for ext. to respond to settlement demand	750.00	0.20	150.00	Billable
9/23/2020 53873	JPS Review Corres review correspondence from mediator	750.00	0.20	150.00	Billable
9/24/2020 53882	JPS DICT. LETTER DICTATE LETTER to and review corres. from class member	750.00	0.40	300.00	Billable
9/25/2020 53899	JPS Phone Conf. PHONE Conference(s) co counsel re MSJ	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/25/2020	JPS 53909 DICT. LETTER DICTATE LETTER to and review corres. from co counsel re motion to modify briefing schedule	750.00	0.20	150.00	Billable
9/28/2020	JPS 53933 Phone Conf. PHONE Conference(s) co counsel re settlement discussions	750.00	0.20	150.00	Billable
9/28/2020	JPS 53942 Review Corres review correspondence from Def. Counsel re settlement discussions	750.00	0.20	150.00	Billable
9/28/2020	JPS 53943 Review Corres review correspondence from co counsel to Def. Counsel re meet and confer	750.00	0.20	150.00	Billable
9/29/2020	JPS 53948 Phone Conf. PHONE Conference(s) co counsel re ex parte	750.00	0.20	150.00	Billable
9/29/2020	JPS 53949 Phone Conf. PHONE Conference(s) Defense counsel to meet and confer ex parte	750.00	0.40	300.00	Billable
9/29/2020	JPS 53952 RP Review Pleading Order reassigning Judge	750.00	0.20	150.00	Billable
9/29/2020	JPS 53953 DICT. LETTER DICTATE LETTER to and review corres. from counsel re ex parte meet and confer	750.00	0.40	300.00	Billable
9/29/2020	JPS 53954 Review Corres review correspondence from Def. Counsel re meet and confer conf.	750.00	0.20	150.00	Billable
9/29/2020	JPS 53957 Review Corres review correspondence from co counsel re ex parte	750.00	0.20	150.00	Billable
9/29/2020	JPS 53958 Phone Conf. phone conf. co counsel re reassignment	750.00	0.20	150.00	Billable
10/1/2020	JPS 53983 Review Corres review correspondence from Def. Counsel re stip. re case management dates	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/1/2020 53984	JPS Review Corres review correspondence from co counsel Counsel re stip. re case management dates	750.00	0.20	150.00	Billable
10/1/2020 54029	JPS Review Corres review correspondence from def. counsel and co counsel re ex parte and stip.	750.00	0.40	300.00	Billable
10/1/2020 54031	JPS Review Corres review further correspondence exchange with client and co counsel re stipl	750.00	0.40	300.00	Billable
10/2/2020 54026	JPS Review Corres review correspondence from Def. re stipulation	750.00	0.20	150.00	Billable
10/2/2020 54027	JPS Review Corres review correspondence from co counsel to Def. re stipulation	750.00	0.20	150.00	Billable
10/6/2020 54084	JPS Prep. Pleading Prepare Pleading Ex parte to shorten time on motion to revise sched. order, Wilens Dec. and proposed order	750.00	0.60	450.00	Billable
10/8/2020 54091	JPS Phone Conf. PHONE Conference(s) co counsel re ex parte	750.00	0.20	150.00	Billable
10/8/2020 54092	JPS RP Review Pleading Def. Opp to Ex Parte	750.00	0.20	150.00	Billable
10/9/2020 54101	JPS RP Review Pleading Order denying ex parte	750.00	0.20	150.00	Billable
10/9/2020 54102	JPS DICT. LETTER Dictate letter to co counsel re Order denying ex parte	750.00	0.20	150.00	Billable
10/10/2020 54103	JPS DICT. LETTER Dictate letter to and review corres. from co counsel re Order denying ex parte	750.00	0.40	300.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/10/2020	JPS 54107 Review Corres review correspondence to Defense Counsel	750.00	0.20	150.00	Billable
10/10/2020	JPS 56432 Review Corres review correspondence to Defense Counsel	750.00	0.20	150.00	Billable
10/12/2020	JPS 54116 Review Corres review correspondence from co counsel and Def. Counsel re settlement discussions	750.00	0.20	150.00	Billable
10/13/2020	JPS 54128 RP Review Pleading order rescheduling class cert. hearing	750.00	0.20	150.00	Billable
10/13/2020	JPS 54129 Phone Conf. Phone Conf. co counsel re order rescheduling class cert. hearing	750.00	0.20	150.00	Billable
10/14/2020	JPS 54130 RP Review Pleading further order changing class cert. hearing back to original date	750.00	0.20	150.00	Billable
10/16/2020	JPS 54142 Review Corres review correspondence def. counsel and co counsel re motions in limine	750.00	0.40	300.00	Billable
10/16/2020	JPS 54143 Review Corres review correspondence from Def. Counsel and co counsel re settlement discussions	750.00	0.40	300.00	Billable
10/19/2020	JPS 54154 Review Corres review correspondence from co counsel to Def. re assignemnt	750.00	0.20	150.00	Billable
10/19/2020	JPS 54166 Phone Conf. Phone Conf. co counsel to Def. re assignment and discovery	750.00	0.20	150.00	Billable
10/19/2020	JPS 54168 Review Corres Review corres. from co counsel to Def. re assignment and discovery	750.00	0.20	150.00	Billable
10/20/2020	JPS 54171 Review Corres review correspondence from co counsel to clients	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/24/2020	JPS 54208 Review Corres review correspondence from court re time of class cert. motion	750.00	0.20	150.00	Billable
10/27/2020	JPS 54224 Review Corres review correspondence from Court re class cert. hearing	750.00	0.20	150.00	Billable
10/29/2020	JPS 54250 Phone Conf. PHONE Conference(s) co counsel re class cert. hearing	750.00	0.20	150.00	Billable
10/30/2020	JPS 54251 HEARING COURT HEARING Class Cert. hearing via zoom	750.00	1.00	750.00	Billable
10/30/2020	JPS 54252 Phone Conf. PHONE Conference(s) co counsel re class cert. hearing	750.00	0.20	150.00	Billable
10/30/2020	JPS 54253 RP Review Pleading Def. Motions in limiine. Dec. Exhibits and proposed order	750.00	0.60	450.00	Billable
10/30/2020	JPS 54254 Prep. Pleading Prepare Pleading, opposition to motions in limine	750.00	0.60	450.00	Billable
10/31/2020	JPS 54259 RP Review Pleading Opposition to Motions in Limine	750.00	0.20	150.00	Billable
11/2/2020	JPS 54280 RP Review Pleading Minutes from Class Cert. Hearing	750.00	0.20	150.00	Billable
11/4/2020	JPS 54299 Review Corres review correspondence from Def. Counsel to Court re scheduling order	750.00	0.20	150.00	Billable
11/4/2020	JPS 54303 RP Review Pleading, Notice of Continuance of pre-trial conference	750.00	0.20	150.00	Billable
11/17/2020	JPS 54431 RP Review Pleading Notice from Court continuing hearing on motions in limine	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/4/2020 54529	JPS Phone Conf. PHONE Conference(s) co counsel re FTC settlement	750.00	0.20	150.00	Billable
12/4/2020 54530	JPS Review Corres Review Corres. from co counsel to Def. Counsel re FTC settlement	750.00	0.20	150.00	Billable
12/4/2020 54531	JPS RP Review FTC stipulated judgment	750.00	0.40	300.00	Billable
12/7/2020 54535	JPS Review Corres review correspondence from Def. Counsel and co counsel re Judgment and possible settlement discussions	750.00	0.40	300.00	Billable
12/7/2020 54537	JPS Phone Conf. PHONE Conference(s) Co Counsel	750.00	0.20	150.00	Billable
12/28/2020 54633	JPS Review Corres review correspondence from co counsel to Def. Counsel re settlement discussions	750.00	0.20	150.00	Billable
1/25/2021 54838	JPS Phone Conf. PHONE Conference(s) co counsel Wilens re MSJ opp.	750.00	0.20	150.00	Billable
1/28/2021 54880	JPS Phone Conf. PHONE Conference(s) co counsel re MSJ	750.00	0.20	150.00	Billable
1/28/2021 54881	JPS RESEARCH RESEARCH MSJ	750.00	0.80	600.00	Billable
1/28/2021 54882	JPS DICT. LETTER DICTATE LETTERs to co counsel re MSJ	750.00	0.60	450.00	Billable
1/28/2021 54885	JPS Phone Conf. PHONE Conference(s) co counsel re MSJ	750.00	0.20	150.00	Billable
1/29/2021 54890	JPS Phone Conf. PHONE Conference(s) co counsel re MSJ	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/29/2021 54891	JPS Prep. Pleading Prepare Pleading Opposition to MSJ	750.00	2.00	1,500.00	Billable
1/29/2021 54894	JPS DICT. LETTER DICTATE LETTER and review corres. from co counsel re MSJ	750.00	0.20	150.00	Billable
1/29/2021 54895	JPS RESEARCH Research re MSJ	750.00	0.20	150.00	Billable
1/29/2021 54896	JPS RP Review Pleading Def. Opp. to Motion to modify scheduling order	750.00	0.20	150.00	Billable
1/29/2021 54897	JPS RP Review Pleading Proposed Order denying Motion to modify scheduling order	750.00	0.20	150.00	Billable
1/29/2021 54898	JPS Review Corres review correspondence from Def. re pre-trial docs.	750.00	0.20	150.00	Billable
1/29/2021 54901	JPS Review Corres review correspondence from Def. Counsel	750.00	0.20	150.00	Billable
1/29/2021 54902	JPS Review Corres review correspondence from Co Counsel re request for entry of default	750.00	0.20	150.00	Billable
1/29/2021 54903	JPS Phone Conf. PHONE Conference(s) Def. Counsel's office re phone conf.	750.00	0.20	150.00	Billable
1/29/2021 54904	JPS DICT. LETTER DICTATE LETTER to Co Counsel re declaration	750.00	0.20	150.00	Billable
1/30/2021 54926	JPS Review Corres review correspondence from co Counsel re meet and confer conf.	750.00	0.20	150.00	Billable
1/30/2021 54928	JPS RP Review Pleading review Opp to MSJ, Sep. Statement, Wilens dec. and 11 exhibits	750.00	1.00	750.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/4/2021 54959	JPS Review Corres review correspondence from co counsel to Def. re stip. re re pre-trial conf.	750.00	0.20	150.00	Billable
2/4/2021 54960	JPS Review Corres review correspondence from clerk re pre-trial conf.	750.00	0.20	150.00	Billable
2/4/2021 54961	JPS Review Corres review correspondence from Def. re stip. re re pre-trial conf.	750.00	0.20	150.00	Billable
2/5/2021 54958	JPS RP Review Pleading class certification order	750.00	0.20	150.00	Billable
2/8/2021 54972	JPS RP Review Pleading, Def. Reply in supp. of MSJ, Evidentiary Objections and Response to Statement of Uncontroverted Facts	750.00	0.60	450.00	Billable
2/9/2021 55012	JPS Review Corres review correspondence exchanges from co counsel and Def. Counsel re settlement discussions and pre-trial docs	750.00	1.40	1,050.00	Billable
2/9/2021 55013	JPS DICT. LETTER DICTATE LETTERS to and review corres from co counsel	750.00	0.60	450.00	Billable
2/9/2021 55058	JPS Review Corres review correspondence from co counsel to DMC re notice	750.00	0.20	150.00	Billable
2/9/2021 55059	JPS Phone Conf. Phone conf. co counsel re notice	750.00	0.20	150.00	Billable
2/10/2021 55015	JPS Review Corres review correspondence from co counsel to Def. re class notice	750.00	0.20	150.00	Billable
2/10/2021 55016	JPS Review Corres review correspondence from co counsel to Def. re trial	750.00	0.20	150.00	Billable
2/10/2021 55017	JPS RP review draft of Joint statement re settlement	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/10/2021	JPS 55022 Review Corres review correspondence form Def. re settlement offer	750.00	0.20	150.00	Billable
2/10/2021	JPS 55055 Review Corres review correspondence from co counsel re settlement demand	750.00	0.20	150.00	Billable
2/10/2021	JPS 55056 Review Corres review correspondence from Def. counsel re settlement offer	750.00	0.20	150.00	Billable
2/10/2021	JPS 55057 Review Corres review correspondence exchange between co consel and DMC re notice	750.00	0.60	450.00	Billable
2/10/2021	JPS 56433 Review Corres review correspondence form Def. re settlement offer	750.00	0.20	150.00	Billable
2/11/2021	JPS 55024 Review Corres review correspondence from co counsel to Def. re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55025 Review Corres review correspondence from Def. re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55026 Review Corres review correspondence from co counsel to Def. re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55027 Review Corres review correspondence from Def. re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55028 Phone Conf. PHONE Conference(s) co counsel re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55029 Phone Conf. PHONE Conference(s) Def. counsel re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55030 Phone Conf. PHONE Conference(s) co counsel re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55031 Phone Conf. PHONE Conference(s) Def. counsel re settlement	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/11/2021	JPS 55032 Review Corres review correspondence from Def. re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55033 Phone Conf. PHONE Conference(s) co counsel re settlement	750.00	0.20	150.00	Billable
2/11/2021	JPS 55034 Prep. Pleading Prepare Pleading Notice of settlement	750.00	0.40	300.00	Billable
2/11/2021	JPS 55035 DICT. LETTER Letter to counsel re Notice of settlement	750.00	0.20	150.00	Billable
2/12/2021	JPS 55049 Phone Conf. PHONE Conference(s) co counsel	750.00	0.20	150.00	Billable
2/12/2021	JPS 55050 Review Corres review correspondence exchanges between co counsel and DMC re notice	750.00	0.60	450.00	Billable
2/16/2021	JPS 55082 RP Review Pleading, Notice of OSC re dismissal	750.00	0.20	150.00	Billable
2/17/2021	JPS 55091 Review Corres review correspondence to Def. counsel re settlement agreement docs.	750.00	0.20	150.00	Billable
2/17/2021	JPS 55092 Review Corres review correspondence from Def. counsel re settlement agreement docs.	750.00	0.20	150.00	Billable
2/17/2021	JPS 55094 Review Corres review correspondence from co counsel to Def. counsel re settlement agreement and prelim. approval motion	750.00	0.20	150.00	Billable
2/17/2021	JPS 55095 Review Corres review correspondence from Def. counsel re class	750.00	0.20	150.00	Billable
2/17/2021	JPS 55096 Review Corres review correspondence from co counsel to Def. counsel re class	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/17/2021	JPS 55097 Review Corres review correspondence exchange between co counsel to Def. counsel re class size	750.00	0.60	450.00	Billable
2/17/2021	JPS 55098 Phone Conf. PHONE Conference(s) co counsel	750.00	0.20	150.00	Billable
2/18/2021	JPS 55100 Review Corres review correspondence from Defense counsel re settlement	750.00	0.20	150.00	Billable
2/18/2021	JPS 55101 DICT. LETTER review correspondence from Defense counsel re settlement	750.00	0.20	150.00	Billable
2/18/2021	JPS 55102 Review Corres review correspondence from Def. re settlement	750.00	0.20	150.00	Billable
2/18/2021	JPS 55103 Review Corres review correspondence from co counsel to Def. re settlement	750.00	0.20	150.00	Billable
2/18/2021	JPS 55104 Phone Conf. PHONE Conference(s) co counsel re settlement discussions	750.00	0.20	150.00	Billable
2/19/2021	JPS 55114 Review Corres review correspondence from Def. Counsel re settlement agreement	750.00	0.20	150.00	Billable
2/23/2021	JPS 55169 Review Corres review correspondence from Def. re settlement agreement	750.00	0.20	150.00	Billable
2/23/2021	JPS 55170 Review Corres review corres. from co counsel to Def. re settlement agreement	750.00	0.20	150.00	Billable
2/27/2021	JPS 55171 Review Corres review correspondence from co counsel to def. re settlement agreement	750.00	0.20	150.00	Billable
2/27/2021	JPS 55172 RP review Wilens revisions to settlement agreement	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/27/2021 55173	JPS DICT. LETTER DICTATE LETTER to co counsel re settlement agreement	750.00	0.20	150.00	Billable
3/1/2021 55197	JPS Review Corres review correspondence from co counsel re settlement agreement	750.00	0.20	150.00	Billable
3/1/2021 55198	JPS Review Corres review correspondence from co counsel to Def. Counsel re settlement agreement	750.00	0.20	150.00	Billable
3/5/2021 55261	JPS Review Corres review correspondence from co counsel re settlement agreement	750.00	0.20	150.00	Billable
3/9/2021 55294	JPS Review Corres review correspondence exchange b/t Wilens and Def. Counsel re settlement docs	750.00	0.40	300.00	Billable
3/12/2021 55315	JPS RP Review Pleading conformed Jt. Status Conf. Stmt.	750.00	0.20	150.00	Billable
4/6/2021 55528	JPS RP Review Pleading minute order continuing OSC re settlement	750.00	0.20	150.00	Billable
4/7/2021 55552	JPS Review Corres review correspondence from co counsel and def. counsel re settlement agreement	750.00	0.40	300.00	Billable
4/7/2021 55590	JPS Review Corres review correspondence from co counsel and def. counsel re revisions to settlement agreement	750.00	0.40	300.00	Billable
4/7/2021 55591	JPS RP Review Pleading class settlement agreement	750.00	0.20	150.00	Billable
4/7/2021 55592	JPS RP Review Pleading individual settlement agreement	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/7/2021 55593	JPS Review Corres review correspondence from co counsel to Def. re finalization of settlement agreements	750.00	0.20	150.00	Billable
4/12/2021 55610	JPS Review Corres review correspondence from co counsel to Def. re motion for preliminary approval	750.00	0.20	150.00	Billable
4/14/2021 55620	JPS Review Corres review correspondence from co counsel re settlement agreements and prelim. approval	750.00	0.20	150.00	Billable
4/14/2021 55621	JPS Review Corres review correspondence from Def. counsel re settlement agreements	750.00	0.20	150.00	Billable
4/14/2021 55622	JPS RP review class settlement agreement	750.00	0.20	150.00	Billable
4/14/2021 55623	JPS RP review individual settlement agreement	775.00	0.20	155.00	Billable
4/14/2021 55624	JPS DICT. LETTER DICTATE LETTER to co counsel re settlement agreements and prelim approval	750.00	0.20	150.00	Billable
4/14/2021 55629	JPS Review Corres review correspondence from co counsel to Def. re settlement agreement	750.00	0.20	150.00	Billable
4/15/2021 55638	JPS Review Corres review correspondence exchange with Def. Counsel re additional data	750.00	0.60	450.00	Billable
4/15/2021 55639	JPS Review Corres review correspondence from co Counsel re prelim. approval motion	750.00	0.20	150.00	Billable
4/15/2021 55640	JPS Prep. Pleading prelim. approval motion	750.00	0.60	450.00	Billable
4/15/2021 55641	JPS DICT. LETTER letter to co counsel re prelim. approval motion	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/16/2021 55647	JPS Review Corres review correspondence from Def. and co counsel re def signatures on set. agreements	750.00	0.20	150.00	Billable
5/11/2021 55871	JPS RP Review Pleading minute order re preliminary approval motion	750.00	0.20	150.00	Billable
5/11/2021 55872	JPS Phone Conf. Phone Conf. co counsel re minute order re preliminary approval motion	750.00	0.20	150.00	Billable
5/17/2021 55928	JPS RP Review Pleading, Notice from Court re Prelim. Approval hearing	750.00	0.20	150.00	Billable
5/24/2021 55981	JPS RP Review Pleading Order granting preliminary approval	750.00	0.20	150.00	Billable
5/25/2021 56003	JPS Review Corres review correspondence from CPT re class notice	750.00	0.20	150.00	Billable
5/27/2021 56021	JPS Review Corres review correspondence from notice admin	750.00	0.20	150.00	Billable
5/27/2021 56022	JPS Review Corres review correspondence from co counsel	750.00	0.20	150.00	Billable
5/27/2021 56033	JPS Review Corres review correspondence further correspondence from CPT	750.00	0.20	150.00	Billable
6/1/2021 56038	JPS Review Corres review correspondence from CPT re notice admin	750.00	0.20	150.00	Billable
6/1/2021 56039	JPS Review Corres review correspondence from co counsel re notice admin	750.00	0.20	150.00	Billable
6/1/2021 56040	JPS Phone Conf. Phone conf co counsel re notice admin	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/2/2021 56057	JPS Review Corres review correspondence from co counsel to CPT	750.00	0.20	150.00	Billable
6/2/2021 56058	JPS Review Corres review correspondence from CPT	750.00	0.20	150.00	Billable
6/2/2021 56059	JPS Review Corres review correspondence, CAFA notice letter	750.00	0.20	150.00	Billable
6/8/2021 56116	JPS Review Corres review correspondence from CPT re notice	750.00	0.20	150.00	Billable
6/10/2021 56131	JPS Review Corres review correspondence form CPT re class list	750.00	0.20	150.00	Billable
6/10/2021 56132	JPS Review Corres review correspondence form Def. Counsel re class list	750.00	0.20	150.00	Billable
6/10/2021 56133	JPS Review Corres review correspondence form co. Counsel re class list	750.00	0.20	150.00	Billable
6/10/2021 56134	JPS Review Corres review correspondence form co. Counsel to Def. Counsel re website	750.00	0.20	150.00	Billable
6/14/2021 56156	JPS Review Corres review correspondence from notice admin.	750.00	0.20	150.00	Billable
6/16/2021 56166	JPS RP Review Pleading, notice from court	750.00	0.20	150.00	Billable
6/16/2021 56171	JPS Review Corres review correspondence from CPT re class notice	750.00	0.20	150.00	Billable
6/16/2021 56172	JPS Review Corres review correspondence from Def. Counsel	750.00	0.20	150.00	Billable
6/17/2021 56180	JPS Review Corres review correspondence to Def. counsel re class list info.	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/17/2021 56181	JPS Review Corres review correspondence to Def. counsel re class notice website	750.00	0.20	150.00	Billable
6/17/2021 56182	JPS DICT. LETTER DICTATE LETTER to co counsel re settlement website	750.00	0.20	150.00	Billable
6/19/2021 56196	JPS Review Corres review correspondence from CPT re class notice	750.00	0.20	150.00	Billable
6/19/2021 56197	JPS Review Corres review correspondence exchanges with co counsel and Def. Counsel re class notice, notice website and class member information	750.00	0.60	450.00	Billable
6/22/2021 56212	JPS Review Corres review correspondence from CPT re class notice	750.00	0.20	150.00	Billable
6/22/2021 56213	JPS Review Corres review correspondence from co counsel re class notice	750.00	0.20	150.00	Billable
6/22/2021 56214	JPS Review Corres review further correspondence from CPT re class website	750.00	0.20	150.00	Billable
6/29/2021 56275	JPS Review Corres review correspondence weekly report re class notice	750.00	0.20	150.00	Billable
7/12/2021 56364	JPS Review Corres review correspondence from CPT re weekly claims report	750.00	0.20	150.00	Billable
7/19/2021 56417	JPS Phone Conf. PHONE Conference(s) co counsel	750.00	0.20	150.00	Billable
7/20/2021 56418	JPS Phone Conf. PHONE Conference(s) co counsel	750.00	0.20	150.00	Billable
7/20/2021 56419	JPS DICT. LETTER Letter to co counsel	750.00	0.20	150.00	Billable

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Date ID	User Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/20/2021 56427	JPS DICT. LETTER DICTATE LETTER to and review corres from co counsel re motion	750.00	0.20	150.00	Billable
7/20/2021 56428	JPS Phone Conf. Phone Conf. co counsel re motion	750.00	0.20	150.00	Billable
7/21/2021 56430	JPS DICT. LETTER DICTATE LETTER to co counsel	775.00	0.20	155.00	Billable
7/21/2021 56431	JPS Prep. Pleading Prepare Pleading, motion for atty. fees and declaration in support of motion for final approval	750.00	2.60	1,950.00	Billable
TOTAL	Billable Fees		164.40	\$123,310.00	
Total of billable expense slips					\$0.00

Calculation of Fees and Costs

	Amount	Total
Fees Bill Arrangement: Slips By billing value on each slip.		
Total of billable time slips	\$123,310.00	
Total of Fees (Time Charges)		\$123,310.00
Total of Costs (Expense Charges)		\$0.00
Total new charges		\$123,310.00
New Balance Current	\$123,310.00	
Total New Balance		\$123,310.00