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8 **THE SPENCER LAW FIRM**
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15 **Attorneys for Plaintiffs**

16 **UNITED STATES DISTRICT COURT,**
17 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

18 MICHELL T. FRANKLIN,) Case No. 8:18-cv-02085-SB-DFMx
19 KARA SAMPSON,)
20 CYBELE A. MUNSON,)
21 on behalf of themselves and all) Complaint filed July 11, 2018
22 persons similarly situated,) Trial Date:
23) Pre-Trial Date:
24 Plaintiff,) Discovery Cutoff:
25) **Class Action**
26 v.)
27) **DECLARATION OF JEFFREY**
28) **WILENS IN SUPPORT OF**
MIDWEST RECOVERY) **MOTION FOR AWARD OF**
SYSTEMS, LLC., ET. AL.,) **ATTORNEY’S FEES AND COSTS**
) **AND INCENTIVE AWARDS**
)
) Hrng Date: September 24, 2021, 8:30am
) Department 6C (1st Street)
) Hon. Stanley Blumenfeld, Jr.
)
Defendants.)

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I, JEFFREY WILENS, hereby declare:

1. I am an attorney of record for Plaintiffs in this matter. I could and would competently testify to the below stated facts of my own personal knowledge if called as a witness.

2. Plaintiffs Sampson and Munson, along with Michell Franklin, who originally filed this class action, sued Defendant Midwest Recovery Systems, a collection agency, and its owners, which attempted to extort payment on old payday loan debt from 11,000 California residents. Because the debt was not enforceable due to the passage of time, not to mention the loans were themselves illegal, Midwest decided to use the leverage of credit-reporting to compel borrowers to make payments on the alleged debt. Accordingly, on various dates in 2017 and 2018, Midwest furnished information to consumer credit reporting agencies, including Equifax, Experian, and TransUnion, stating that Plaintiffs and the other Class Members owed money to the illegal lenders.

3. Plaintiffs Sampson and Munson and 187 other persons paid money under duress to Midwest in order to have the adverse information deleted from their credit report. The total amount paid was \$94,366.34. Plaintiff Franklin and the rest of the putative class members did not and continued to suffer the adverse consequences. Eventually, in response to this

1 litigation, Midwest Recovery asked the credit bureaus to delete all 11,000
2 tradelines.

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4 4. On February 5, 2021, the Court granted in part and denied in part
5 Plaintiffs' motion for class certification. The Court denied the motion
6 brought by Franklin to certify a class of all persons who had their credit
7 damaged by Defendants' actions. Franklin subsequently has negotiated a
8 settlement to resolve her individual claims, but (at Defendants'
9 insistence) it will not go into effect unless the class action settlement
10 (discussed below) is granted final approval.
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13 5. On the other hand, the Court granted the certification motion with respect
14 to the class (formerly a subclass) of persons who paid money under duress
15 to Defendants. Subsequently, Plaintiffs Sampson and Munson negotiated
16 a class action settlement on behalf of the class with Defendants, which was
17 granted preliminary approval.
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20 6. The settlement class is the same as the restitution subclass certified by the
21 Court. However, after the class was certified, Defendants located 23
22 additional instances where consumers paid money to Midwest Recovery
23 after the subject payday loan debt was reported. This batch of consumers
24 paid another \$9,376.45 to Defendants, but did so around April 2020,
25 while the members of the certified class paid between 2017 and 2018. This
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1 raises the total amount of money paid by class members to \$103,742.79.
2 Because some individuals paid on more than one loan, the new total
3 number of class members is 209. The average payout is \$429 but some
4 class members will receive more than one payment. The range of
5 payments is \$25 to \$1,380.
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8 7. On February 5, 2021, and again on May 20, 2021, the Court previously
9 approved me to serve as Counsel for the Class. My experience and
10 qualifications to serve in that role are set forth below.
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12 8. The class settlement agreement provided that in the “motion for an award
13 of attorneys’ fees, costs, and service awards, Plaintiffs shall disclose the
14 amount of attorneys’ fees that are to be paid pursuant to an individual
15 settlement agreement with Plaintiff Franklin.” That amount is \$136,257
16 total for both of Plaintiff’s law firms.
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19 9. During the prosecution of the case, I utilized the services of paralegal
20 Macy Wilens, who was at that time, a recent law school graduate and who
21 took and passed the California bar examination later that year. Before
22 then she had three years of paralegal/law clerk experience. She was billed
23 at \$165 per hour which is consistent with the market rate for such services.
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25 10. My current billing rate for noncontingency matters is \$750 per hour,
26 the amount is supported by my academic and professional credentials as
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1 well as my expertise in the prosecution of consumer and employee class
2 actions, and which is in the range of what other courts have approved, as
3 set forth below. I am familiar with the prevailing market rate for attorneys
4 with similar experience and credentials in consumer law cases, and
5 particularly in consumer class actions, taken on a noncontingency fee
6 basis and declare that the \$750 rate is consistent with the market rate.
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9 11. I have extensive experience in complex litigation and have been appointed
10 by numerous courts to serve as Class Counsel as set forth below.
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12 12. I was graduated from the University of California, Berkeley School of Law
13 in 1985 and have had a mixed practice including civil and criminal
14 litigation and appellate work for over 30 years, the last 18 years of which
15 have been in Orange County area. I was certified by the California State
16 Bar Board of Legal Specialization as a specialist in Appellate Law (which
17 includes civil appeals and writs) from 1999-2009 and was certified as a
18 specialist in criminal law (which requires extensive trial experience) from
19 1994 to 2004.
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22 13. I am duly admitted and qualified to appear before all California state
23 courts since December 1985, and before the United States Supreme Court,
24 before the Ninth Circuit Court of Appeals and before the federal courts for
25 the Northern, Central, Eastern and Southern Districts of California and
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District of Colorado.

14. A number of cases I handled on appeal (and usually in the trial court as well) resulted in published appellate opinions including the following: Sosa v. CashCall, Inc. (2020) 49 Cal.App.5th 42; Andrews v. Sirius XM Radio Inc. (9th Cir. 2019) 932 F.3d 1253; Derderian v. Southwestern & Pacific Specialty Finance, Inc. (9th Cir. 2016) 673 Fed.Appx. 736; Maloney v. Verizon Internet Services, Inc. (9th Cir. 2011) 413 Fed.Appx. 997; Hernandez v. Vitamin Shoppe Industries (2009) 174 Cal.App.4th 1441; Mark v. Spencer (2008) 166 Cal.App.4th 219; Rose v. Chase Bank USA, N.A. (9th Cir. 2008) 513 F.3d 1032; Ortiz v. Lyon Management Group (2007) 157 Cal.App.4th 604; Trujillo v. First American Registry, Inc. (2007) 157 Cal.App.4th 628; Schulz v. Neovi Data Corp. (2007) 152 Cal.App.4th 86; Freeman v. DirecTV, Inc. (9th Cir. 2006) 457 F.3d 1001; Experian Information Solutions, Inc. v. Superior Court (2006) 138 Cal.App.4th 122; Jones v. Citigroup, Inc. (2006) 135 Cal.App.4th 1491, review granted; Wolski v. Fremont Investment & Loan (2005) 127 Cal.App.4th 347; Morris v. Redwood Empire Bancorp (2005) 128 Cal.App.4th 1305; Blanchard v. Directv, Inc. (2004); 123 Cal.App.4th 903; Janik v. Rudy, Exelrod & Zieff (2004) 119 Cal.App.4th 930; Ansley v. Ameriquest Mortgage Co. (9th Cir. 2003) 340 F.3d 858; Decker v. U.D.

1 Registry (2003) 105 Cal.App.4th 1382; People v. Bau Mooc (2002) 26
2 Cal.4th 1216; Chavez v. Whirlpool Corp. (2001) 93 Cal.App. 4th 363;
3 County of Orange v. Wu (2000) 79 Cal. App. 4th 759; Nelson v. City of
4 Irvine (9th Cir. 1998) 143 F.3d 1196.

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6 15. I am currently prosecuting at least 25 consumer or employment law
7 actions in the state or federal court system at various procedural stages
8 and have successfully obtained recoveries on claims under various
9 consumer and employee protection statutes. In just the past five years, I
10 have personally litigated as lead counsel more than 100 civil actions,
11 including more than 40 class actions, in which there were statutory
12 provisions for the awarding of attorney's fees. I have been appointed by
13 the court to be class counsel on some of those and have never been ruled
14 to be an inadequate class counsel.
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18 16. Courts have awarded me attorney's fees as class counsel in numerous
19 cases at different hourly rates over the years. Most recently, on June 22,
20 2020, the Honorable Jeffrey S. White of the United States District Court,
21 Northern District of California granted final approval to a class action
22 settlement in which I had been appointed as Class Counsel in the case of
23 Sean L. Gilbert v. MoneyMutual, LLC, Case No. 13-cv-01171-JSW and
24 approved my hourly rate of \$750. A copy of this order is attached to this
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1 declaration as Exhibit 2 and incorporated thereby. See page 4.

2 17. Similarly, on February 8, 2019, the Honorable Ronald F. Frazier of the
3 San Diego Superior Court granted final approval to a class action
4 settlement in which I had been appointed as Class Counsel in the case of
5 Hansen v. California Suites Hotel, Case No. 37-2014-00022185 and
6 approved my hourly rate of \$750. A copy of this order is attached to the
7 Spencer Declaration and incorporated thereby.
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10 18. Similarly, on December 5, 2017, the Honorable John S. Wiley granted
11 final approval to a class action settlement in which I had been appointed
12 as Class Counsel in Cohen v. Chuck's Parking Service, Los Angeles County
13 Superior Court case no. BC611085 and awarded me attorney's fees at the
14 hourly rate of \$750. A copy of this order is attached to the Spencer
15 Declaration and incorporated thereby.
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19 19. I was also appointed to be class counsel in class actions granted final
20 approval and awarded attorney's fees at the rate of \$700 per hour between
21 2013 and 2018 in the following cases: Winkler v. Media Entertainment
22 Partners, Alameda County Superior Court case no. RG13667619;
23 Mingione v. Events & Adventures, Orange County Superior Court Case
24 No. 30-2012-00547490; Hinshaw v. Vizio, Inc., United States District
25 Court Case No. SACV14-00876-DOC (ANx); Keen v. Coral Reef
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1 Productions, Inc., United States District Court Case No. 8:14-cv-00814-
2 JVS-JCG; Rainbolt v. Financial Assistance Inc., Alameda County Superior
3 Court case no. RG12654833.
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5 20. I was also appointed to be class counsel in class actions granted final
6 approval and awarded attorney's fees between 2008 and 2015 in the
7 following cases: Greco v. Selection Management Systems, Inc., San Diego
8 County Superior Court Case No. 37-2014-00085074; Davis v. Citibank,
9 Orange County Superior Court Case No. 30-2008-00060145; In Re ISTA
10 Utility Billing Cases, JCCP No. 4491, San Diego County Superior Court;
11 Souttaphonh v. ALC-Partner, Inc., Orange County Superior Court Case
12 No. 07CC01378; Lavergne v. Evergreen Royale, LLC, Orange County
13 Superior Court Case No. 30-2008-00212468; Hamilton v. Vitamin
14 World, Alameda County Superior Court Case No. RG10524008; Adams v.
15 Luxottica U.S. Holdings Corp., Orange County Superior Court case no.
16 07CC01346; Narcisse v. Eyexam of California, Orange County Superior
17 Court Case No. 30-2008-00074926; Thompson v. Vitamin Shoppe,
18 Orange County Superior Court Case No. 05CC00048; Clark v. United
19 Healthcare, Orange County Superior Court Case No. 30-2008-00087508;
20 Aguilard v. E-Commerce Exchange, Orange County Superior Court Case
21 No. 05CC02794; Amaya v. 3M, San Bernardino County Superior Court
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1 Case No. CIVRS702515; Babasa v. Lenscrafters, Orange County Superior
2 Court Case No. 05CC00079; Devoe v. EZ Lube, the Orange County
3 Superior Court Case No. 06CC00042.
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5 21. I also served as court-approved class counsel in the following cases, all of
6 which were granted final approval between 2000 and 2007 and I was
7 awarded attorney's fees: Ardoin v. American Express Company, Orange
8 County Superior Court, Case No. 03CC00244; Litalien v. GE Capital,
9 Orange County Superior Court, Case No. 04CC10082; Janik v. Rudy
10 Exelrod & Zieff, Alameda County Superior Court, Case No. 2002070478;
11 Behm, Edge v. Tool City dba City Loan, Orange County Superior Court,
12 Case No. 04CC00705; Freeman v. Ricochet Networks, Orange County
13 Superior Court, Case No. 03CC00525; Ansley v. Ameriquest, Orange
14 County Superior Court Case No. 01CC00220; Smith v. Galaxy Mall,
15 Orange County Superior Court Case No. 03CC05871; Martin v. Axin
16 Financial, Orange County Superior Court Case No. 03CC04236; White v.
17 Hedstrom, Orange County Superior Court Case No. 03CC00274; Smith
18 v. Kellogg Company, Orange County Superior Court Case No. 03CC00101;
19 Deke v. Cardservice International, Los Angeles County Superior Court
20 Case No. BC271679; McDonald v. RealNetworks, Orange County Superior
21 Court Case No. 816666; Boyd v. The Finance Company, Orange County
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1 Superior Court Case No. 01CC13645; Roy v. Inglewood Park Cemetery,
2 Los Angeles County Superior Court Case No. BC 249751; Coyle v. Westec,
3 Orange County Superior Court Case No. 792589; Balboa v. Leasecomm,
4 Orange County Superior Court Case No. 01CC00284; Wilens v. American
5 Benefit Mortgage, Case No. 01CC06156; Brown v. Aureate Media
6 Corporation, Los Angeles County Superior Court No. BC225886; Dumas
7 v. Enterprise Rent-A-Car, Orange County Superior Court case no.
8 798800.
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12 22. As of July 21, 2021, the Lakeshore Law Center has spent 392.3 hours
13 in the prosecution of this lawsuit. The Lakeshore Law Center's fees
14 breakdown as follows: 386.9 hours by Jeffrey Wilens and 5.4 hours by
15 Macy Wilens. The Lakeshore Law Center's lodestar as of July 21, 2021, is
16 \$291,066. A report of our contemporaneous time records and expenses
17 is attached hereto as Exhibit 1 and incorporated thereby.
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20 23. Our work product includes these events as well as routine court
21 hearings and communications with co-counsel or opposing counsel:

- 22 • Drafting the original complaint and multiple amendments
- 23 • Drafting deposition notices, interrogatories and requests for
- 24 production, multiple briefings and hearings on discovery disputes
- 25 • Responding to interrogatories, requests for admissions, and
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requests for production of documents

- Defending four depositions
- Drafting motion for class certification which was contested but granted
- Drafting motions for preliminary approval and this motion for fees (and future motion for final approval)
- Drafting settlement conference brief and later mediation brief, Preparation for and attending two settlement conference/mediation sessions
- Meeting with clients on multiple occasions, regular phone and email communication with clients
- Review and analyzing extensive document production including spreadsheet of 11,000 violations, efforts to contact and obtain statements from witnesses from that list
- Briefing opposition to motion to dismiss and later motion for summary judgment and in limine motions.

24. In addition, Lakeshore Law Center incurred \$10,699 in costs and expenses. Reports of my costs records are also found in Exhibit 1.

25. There was no unnecessary duplication of effort and the combined efforts of Lakeshore Law Center and Spencer Law Firm were required for

1 the successful outcome in the case.

2 26. It is estimated that I will expend an additional 20 hours of time beyond
3 my current lodestar for work done after the fees petition is filed, including
4 preparing the motion for final approval, traveling to and attending the
5 final approval hearing and through the settlement distribution process.
6 However, given the fees cap in this case this additional time may not need
7 to be considered.
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10 27. Plaintiffs were represented on a contingency fee basis. Plaintiffs were
11 unable to pay Counsel their hourly rate and could not have brought this
12 action unless Counsel was willing to accept this case on a contingency fee
13 basis.
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16 28. This was a very time consuming and difficult case to litigate and
17 required me to dedicate significant time and expense to obtain the
18 successful outcome. These efforts limited my availability to take other
19 work.
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21 29. I recommend the settlement as fair, reasonable and adequate and in
22 the best interest of the class.
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24 Executed on July 21, 2021, at Yorba Linda, California.

25 By /s/ Jeffrey Wilens

26 JEFFREY WILENS
27 Attorney for Plaintiffs
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Re: Franklin v. Midwest Recovery Systems, LLC

Date	Staff	Description	Rate	Hours	Amount
07/10/2018	JW	Draft complaint, summons, civil case cover sheet	\$750.00	3.00	\$2,250.00
07/10/2018	JW	Research defendant, review credit reports, background information	\$750.00	4.00	\$3,000.00
07/11/2018	JW	Email correspondence with client	\$750.00	0.20	\$150.00
07/11/2018	JW	Redo summons	\$750.00	0.10	\$75.00
07/12/2018	JW	Email correspondence with St. Louis process server, phone conference with him to arrange service, prepare proof of service template	\$750.00	0.30	\$225.00
07/15/2018	JW	Review non-service of debt report, research additional service info, email correspondence with process server	\$750.00	0.40	\$300.00
07/16/2018	JW	Phone Conference with debt to develop new service address, email correspondence with process server	\$750.00	0.30	\$225.00
07/17/2018	JW	Email correspondence with client, review new docs	\$750.00	0.20	\$150.00
07/20/2018	JW	Phone conference with Pam of process server	\$750.00	0.10	\$75.00
07/21/2018	JW	Review proof of service, email correspondence with process server	\$750.00	0.20	\$150.00
08/06/2018	JW	Email correspondence with client	\$750.00	0.10	\$75.00
08/10/2018	JW	Review 8-10-18 CMC order, make future plans	\$750.00	0.20	\$150.00
08/13/2018	JW	Phone conference with debt	\$750.00	0.10	\$75.00
08/14/2018	JW	Email correspondence with debt	\$750.00	0.10	\$75.00
08/14/2018	JW	Phone conference with debt	\$750.00	0.20	\$150.00
08/15/2018	JW	Phone conference with Kenny Conway for debt	\$750.00	0.50	\$375.00
09/06/2018	JW	Email correspondence with debt re: getting lawyer	\$750.00	0.10	\$75.00
09/19/2018	JW	Email correspondence with debt atty	\$750.00	0.20	\$150.00
09/20/2018	JW	Phone conference with debt atty Taylor	\$750.00	0.10	\$75.00
09/26/2018	JW	Email correspondence with client	\$750.00	0.10	\$75.00
10/03/2018	JW	Phone conference with debt atty Taylor re: case status	\$750.00	0.20	\$150.00
10/04/2018	JW	Email correspondence with debt atty re: meet and confer	\$750.00	0.10	\$75.00
10/05/2018	JW	Phone conference with debt attys re: CMC	\$750.00	0.60	\$450.00

10/09/2018	JW	Review stipulation to continue, finalize Joint CMC statement, email correspondence with deft atty	\$750.00	0.40	\$300.00
10/13/2018	JW	Email correspondence with co-counsel	\$750.00	0.20	\$150.00
10/15/2018	JW	Email correspondence with Taylor re: defense cooperation	\$750.00	0.10	\$75.00
10/15/2018	JW	Email correspondence with deft atty re: CMC	\$750.00	0.10	\$75.00
10/17/2018	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.20	\$150.00
10/29/2018	JW	Draft Doe Amendments 1 & 2, create service list	\$750.00	0.50	\$375.00
10/29/2018	JW	Set up court call for 11-5-18	\$750.00	0.10	\$75.00
10/29/2018	JW	Email correspondence with deft atty re: informal discovery	\$750.00	0.10	\$75.00
11/05/2018	JW	Case Management Conference	\$750.00	0.50	\$375.00
11/05/2018	JW	Confer with process and set up service of process on Cooper Financial	\$750.00	0.30	\$225.00
11/07/2018	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.10	\$75.00
11/09/2018	JW	Email correspondece with deft atty re: Doe defendants	\$750.00	0.30	\$225.00
11/15/2018	JW	Email correspondence with process server re: Cooper Financial	\$750.00	0.10	\$75.00
11/15/2018	JW	Email correspondence with deft atty re: removal, research removal cases cited	\$750.00	0.50	\$375.00
11/15/2018	JW	Phone conference with deft atty re: Cooper Financial & insurance	\$750.00	0.40	\$300.00
11/16/2018	JW	Email correspondence with atty Rogers who prevoiusly sued Cooper	\$750.00	0.10	\$75.00
11/16/2018	JW	Additional research on locating Cooper Financial and other litigation against it	\$750.00	2.00	\$1,500.00
11/17/2018	JW	Email correspondence with deft atty re: informal discovery	\$750.00	0.30	\$225.00
11/19/2018	JW	Email correspondence with atty Rogers who prevoiusly sued Cooper	\$750.00	0.20	\$150.00
11/19/2018	JW	Review Answer to Complaint	\$750.00	0.30	\$225.00
11/21/2018	JW	Email correspondence with deft atty, review Notice of Removal, doc production	\$750.00	1.10	\$825.00
11/22/2018	JW	Review insurance policy, research coverage issues	\$750.00	1.40	\$1,050.00
11/26/2018	JW	Email correspondence with deft atty re: removal to federal court	\$750.00	0.20	\$150.00

11/27/2018	JW	Review Initial Standing Order & Order Setting Scheduling Conference, make future plans	\$750.00	1.00	\$750.00
12/06/2018	JW	Email correspondence with deft atty, review 12-6-18 letter meeting and conferring	\$750.00	0.60	\$450.00
12/06/2018	JW	Review supplement to notice of removal	\$750.00	0.20	\$150.00
12/06/2018	JW	Email correspondence with deft Mark Gray	\$750.00	0.20	\$150.00
12/07/2018	JW	Initial research on actual damages issue raised by Defendant	\$750.00	1.10	\$825.00
12/10/2018	JW	Phone conference with Mark Gray	\$750.00	0.10	\$75.00
12/10/2018	JW	Email correspondence with deft atty re: motion JOP meet and confer	\$750.00	0.20	\$150.00
12/10/2018	JW	Review application for Pro Hac Vice for Coller	\$750.00	0.20	\$150.00
12/12/2018	JW	Phone conference with deft atty Coller, meet and confer on motions	\$750.00	1.00	\$750.00
12/12/2018	JW	Email correspondence with deft Mark Gray	\$750.00	0.10	\$75.00
12/14/2018	JW	Email correspondence with Mark Gray, review document bill of sale	\$750.00	0.20	\$150.00
12/17/2018	JW	Review third pro hac vice application by deft	\$750.00	0.10	\$75.00
12/26/2018	JW	Email correspondence with deft atty re: early meeting	\$750.00	0.10	\$75.00
12/26/2018	JW	Email Correspondence with deft atty re: early meeting	\$750.00	0.10	\$75.00
12/27/2018	JW	Phone conference with deft atty Coller early meeting of counsel	\$750.00	1.00	\$750.00
12/29/2018	JW	Draft Joint Report Rule 26(f)	\$750.00	1.30	\$975.00
01/03/2019	JW	Review revised Joint Report 26(f), finalize, email correspondence with deft atty	\$750.00	1.10	\$825.00
01/04/2019	JW	Email correspondence with deft atty re: Joint Report, scheduling	\$750.00	0.20	\$150.00
01/16/2019	JW	Review order for mediation	\$750.00	0.10	\$75.00
01/19/2019	JW	Email correspondence with deft atty Coller re: initial disclosures	\$750.00	0.10	\$75.00
01/19/2019	JW	Review Scheduling Order, prepare for various deadlines, make plans	\$750.00	1.10	\$825.00
01/21/2019	JW	Email correspondence with deft atty re: initial disclosures	\$750.00	0.20	\$150.00
01/21/2019	JW	Draft Plaintiff's Initial Disclosures	\$750.00	0.50	\$375.00

01/23/2019	JW	Phone conference with Mark Gray re: chain of title on the loans	\$750.00	0.20	\$150.00
01/23/2019	JW	Draft interrogatories, requests for production set 1 on Midwest Recovery	\$750.00	2.30	\$1,725.00
01/24/2019	JW	Email correspondence with deft atty re: motion to strike	\$750.00	0.20	\$150.00
01/30/2019	JW	Email correspondence with client	\$750.00	0.10	\$75.00
02/06/2019	JW	Email Correspondence with deft atty re: mediation	\$750.00	0.10	\$75.00
02/10/2019	JW	Draft First Amended Complaint, email correspondence with deft atty	\$750.00	1.00	\$750.00
02/11/2019	JW	Email correspondence with deft atty re: mediation & insurance coverage	\$750.00	0.10	\$75.00
02/11/2019	JW	Further revisions to proposed FAC, draft stipulation to file, email correspondence with deft atty, finalize stipulation for filing & proposed order	\$750.00	1.40	\$1,050.00
02/13/2019	JW	Email correspondence with ADR Services re: mediation Daniel Ben-Zvi	\$750.00	0.20	\$150.00
02/13/2019	JW	Draft Summons to be issued	\$750.00	0.20	\$150.00
02/22/2019	JW	Email Correspondence with deft atty re: discovery responses	\$750.00	0.10	\$75.00
02/22/2019	JW	Email correspondence with ADR Services re: mediation	\$750.00	0.10	\$75.00
02/25/2019	JW	Initial review of Midwest responses to interros, RPDs, doc productin, draft meet and confer request	\$750.00	1.30	\$975.00
02/25/2019	JW	Email correspondence with Mark Gray re: case discovery, service, review chain of title documents provided today	\$750.00	0.30	\$225.00
02/26/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.20	\$150.00
02/26/2019	JW	Email correspondence with deft atty Coller re: discovery issues	\$750.00	0.40	\$300.00
02/27/2019	JW	Email correspondence with deft atty Coller re: settlement & discovery	\$750.00	0.30	\$225.00
02/27/2019	JW	Phone conference with deft atty Taylor re: meet and confer on discovery, summarize future steps	\$750.00	1.20	\$900.00
03/04/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.10	\$75.00
03/06/2019	JW	Review insurance denial letter disclosed today & policy, research legal issues	\$750.00	2.00	\$1,500.00
03/06/2019	JW	Email correspondence with deft atty re: insurance issues	\$750.00	0.10	\$75.00

03/07/2019	JW	Email correspondence with deft atty Coller re: insurance issues, settlement	\$750.00	0.20	\$150.00
03/07/2019	JW	Phone conference with deft atty Coller re: insurance issues	\$750.00	0.70	\$525.00
03/12/2019	JW	Review first and second insurance policies and compare with current one	\$750.00	0.50	\$375.00
03/12/2019	JW	Phone conference with deft atty Coller re: insurance coverage	\$750.00	0.30	\$225.00
03/14/2019	JW	Draft policy limits demand on Hiscox Insurance	\$750.00	1.00	\$750.00
03/15/2019	JW	Review Answer to First Amended Complaint filed by Midwest Recovery	\$750.00	0.30	\$225.00
03/21/2019	JW	Email correspondence with mediator re: mediation date	\$750.00	0.10	\$75.00
03/23/2019	JW	Email correspondence with deft atty re: mediation	\$750.00	0.10	\$75.00
04/10/2019	JW	Email correspondence with deft atty Coller re: policy limits demand	\$750.00	0.10	\$75.00
04/10/2019	JW	Email correspondence with Hiscox adjuster re: policy limits demand	\$750.00	0.10	\$75.00
04/10/2019	JW	Phone conference with new adjuster for Hiscox	\$750.00	0.10	\$75.00
04/14/2019	JW	Email correspondence with deft atty re: discovery issues & settlement	\$750.00	0.20	\$150.00
04/15/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.10	\$75.00
04/16/2019	JW	Email correspondence with deft atty re: discovery meet and confer	\$750.00	0.10	\$75.00
04/16/2019	JW	Draft Joint Stipulation for Motion to Compel re: Deft discovery responses	\$750.00	1.50	\$1,125.00
04/17/2019	JW	Phone conference with expert Thomas Tarter	\$750.00	0.40	\$300.00
04/17/2019	JW	Phone conference with deft atty Coller, meet and confer on discovery	\$750.00	0.50	\$375.00
04/19/2019	JW	Email correspondence with Magistrate Judge re: discovery conference	\$750.00	0.10	\$75.00
04/23/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.20	\$150.00
04/23/2019	JW	Email Correspondence with deft atty re: discovery meet and confer	\$750.00	0.20	\$150.00
04/23/2019	JW	Draft informal discovery statement for Magistrate Judge	\$750.00	2.00	\$1,500.00
04/24/2019	JW	Review deft informal discovery conference statement, research authorities cited	\$750.00	0.70	\$525.00
04/25/2019	JW	Discovery Conference with Magistrate	\$750.00	0.80	\$600.00

04/25/2019	JW	Email correspondence with client	\$750.00	0.10	\$75.00
04/25/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.40	\$300.00
04/29/2019	JW	Phone conference with deft atty re: discovery meet and confer	\$750.00	0.50	\$375.00
04/29/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.10	\$75.00
04/30/2019	JW	Draft Supplemental brief for informal discovery hearing	\$750.00	3.00	\$2,250.00
05/01/2019	JW	Finalize Supplemental brief for informal discovery hearing	\$750.00	0.40	\$300.00
05/02/2019	JW	Review deft supplemental responses, draft second supplemental brief for informal discovery conference	\$750.00	1.30	\$975.00
05/02/2019	JW	Review deft supplemental brief for discovery conference	\$750.00	0.40	\$300.00
05/02/2019	JW	Email correspondence with Magistrate & opposing counsel re: discovery conference	\$750.00	0.10	\$75.00
05/03/2019	JW	Email correspondence with client	\$750.00	0.10	\$75.00
05/03/2019	JW	Review 5-3-19 minute order re: discovrey conference	\$750.00	0.10	\$75.00
05/03/2019	JW	Discovery Conference with Magistrate	\$750.00	1.00	\$750.00
05/03/2019	JW	Phone conference with deft atty Coller re: discovery issues	\$750.00	1.00	\$750.00
05/04/2019	JW	Email correspondence with client	\$750.00	0.10	\$75.00
05/06/2019	JW	Email correspondence with deft atty re: discovery order	\$750.00	0.10	\$75.00
05/06/2019	JW	Review protective order template, email correspondence with deft atty Coller re: protective order	\$750.00	0.20	\$150.00
05/06/2019	JW	Review proposed protective order stipulation, revise to draft 2, email correspondence with deft atty	\$750.00	0.80	\$600.00
05/06/2019	JW	Review Magistrate Judge order on discovery issues	\$750.00	0.20	\$150.00
05/07/2019	JW	Email correspondence with deft atty re: class list	\$750.00	0.40	\$300.00
05/07/2019	JW	Review and finalize draft protective order, email correspondence with deft atty	\$750.00	0.40	\$300.00
05/08/2019	JW	Email correspondence with deft atty re: discovery compliance	\$750.00	0.20	\$150.00
05/08/2019	JW	Review deft discovery requests set 1, email correspondence with client	\$750.00	0.40	\$300.00
05/09/2019	JW	Email Correspondence with client, review new docs produced by client	\$750.00	0.50	\$375.00

05/09/2019	JW	Email correspondence with deft atty Coller re: discovery issues	\$750.00	0.20	\$150.00
05/09/2019	JW	Phone conference with deft atty Coller re: discovery	\$750.00	0.40	\$300.00
05/10/2019	JW	Review notice of submission of protective order for court approval	\$750.00	0.10	\$75.00
05/10/2019	JW	Email correspondence with client	\$750.00	0.20	\$150.00
05/15/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.10	\$75.00
05/16/2019	JW	Email correspondence with deft atty re: deposition, continuance	\$750.00	0.20	\$150.00
05/16/2019	JW	Email Correspondence with client	\$750.00	0.20	\$150.00
05/16/2019	JW	Review deposition notice of Plaintiff	\$750.00	0.10	\$75.00
05/18/2019	JW	Draft Ex Parte Application for order changing deadlines on class cert	\$750.00	2.40	\$1,800.00
05/20/2019	JW	Email correspondence with deft atty re: discovery responses	\$750.00	0.10	\$75.00
05/20/2019	JW	Review deft opposition to ex parte application to continue cert deadline	\$750.00	0.20	\$150.00
05/21/2019	JW	Draft mass mail letter to restitution subclass members, review spreadsheet	\$750.00	1.30	\$975.00
05/22/2019	JW	Review Order 5-22-19 amending class certification briefing schedule	\$750.00	0.20	\$150.00
05/22/2019	JW	Email correspondence with deft atty re: deposition	\$750.00	0.20	\$150.00
05/22/2019	JW	Draft mass mail letter to restitution subclass members, draft class member intake form & questionnaire	\$750.00	2.00	\$1,500.00
05/23/2019	JW	Email correspondence with deft atty re: deposition	\$750.00	0.20	\$150.00
05/23/2019	JW	Email correspondence with court re: discovery conference	\$750.00	0.10	\$75.00
05/24/2019	JW	Email correspondence with client	\$750.00	0.10	\$75.00
05/24/2019	JW	Email correspondence with court re: discovery conference	\$750.00	0.10	\$75.00
05/25/2019	MW	PARALEGAL Create restitution subclass list, prepare cover letter & questionnaire, prepare mailing	\$165.00	4.00	\$660.00
05/28/2019	JW	Draft informal discovery conference statement about deposition location	\$750.00	2.00	\$1,500.00
05/29/2019	JW	Review deft informal discovery conference statement for deposition lcoation	\$750.00	0.20	\$150.00
05/29/2019	JW	Phone Conference with co-counsel	\$750.00	0.40	\$300.00
05/30/2019	JW	Discovery Conference, make future plans	\$750.00	0.40	\$300.00

05/30/2019	JW	Email correspondence with client	\$750.00	0.10	\$75.00
05/30/2019	JW	Email correspondence with deft atty re: deposition location & date	\$750.00	0.20	\$150.00
05/30/2019	JW	Left phone message for expert	\$750.00	0.10	\$75.00
05/31/2019	JW	Email correspondence with class member Ronald C. Diaz, review docs	\$750.00	0.30	\$225.00
05/31/2019	JW	Email correspondence with magistrate judge re: discovery dispute	\$750.00	0.10	\$75.00
05/31/2019	JW	Email correspondence with deft atty re: deposition of Plaintiff	\$750.00	0.10	\$75.00
06/01/2019	JW	Email correspondence with class member J Carey Loomis, review docs	\$750.00	0.30	\$225.00
06/03/2019	JW	Email correspondence with class member Loomis	\$750.00	0.20	\$150.00
06/03/2019	JW	Review Questionnaire responses and returned to sender mailings	\$750.00	0.50	\$375.00
06/03/2019	JW	Phone conference with class member Timothy Abeyta	\$750.00	0.20	\$150.00
06/03/2019	JW	Email correspondence with deft atty re: doc production	\$750.00	0.10	\$75.00
06/03/2019	JW	Phone conference with expert	\$750.00	0.20	\$150.00
06/04/2019	JW	Draft legal services agreement, email correspondence with Kara Sampson	\$750.00	0.30	\$225.00
06/04/2019	JW	Phone conference with expert	\$750.00	0.30	\$225.00
06/04/2019	JW	Phone conference with class member Kara Sampson (aka Christensen)	\$750.00	0.30	\$225.00
06/06/2019	JW	Email Correspondence with class member Cybele Munson, review docs	\$750.00	0.20	\$150.00
06/06/2019	JW	Draft Second Amended Complaint	\$750.00	2.50	\$1,875.00
06/06/2019	JW	Email Correspondence with client Munson	\$750.00	0.20	\$150.00
06/06/2019	JW	Email correspondnce with client Sampson	\$750.00	0.20	\$150.00
06/07/2019	JW	Email correspondence with deft atty re: Second Amended Complaint	\$750.00	0.10	\$75.00
06/07/2019	JW	Review questionnaire response of class member Paul Yi	\$750.00	0.10	\$75.00
06/07/2019	JW	Email correspondence with expert, review other expert reports	\$750.00	0.60	\$450.00
06/07/2019	JW	Email correspondence with class member Krystal Day	\$750.00	0.20	\$150.00
06/08/2019	JW	Review Questionnaire responses, docs from class member Mary Redmon	\$750.00	0.20	\$150.00
06/25/2019	JW	Review questionnaire from class member Jessica Colter	\$750.00	0.20	\$150.00

06/25/2019	JW	Review questionnaire from class member Donnier Daughtery	\$750.00	0.20	\$150.00
06/25/2019	JW	Email correspondence with client	\$750.00	0.20	\$150.00
06/25/2019	JW	Email correspondence with deft atty Coller re: depositions, SAC	\$750.00	0.10	\$75.00
06/25/2019	JW	Review questionnaire from class member Maricel Jacob	\$750.00	0.10	\$75.00
06/25/2019	JW	Review documents submitted by class member Elsa Larios	\$750.00	0.20	\$150.00
06/25/2019	JW	Review return to sender notices from class members	\$750.00	0.10	\$75.00
06/26/2019	JW	Review Questionnaire from class member Charmon Wilson	\$750.00	0.20	\$150.00
06/27/2019	JW	Review Questionnaires from class members Annaconi Gonzalez, Luis Reyes, Juanita Conedy, Raylin Storton	\$750.00	0.80	\$600.00
06/28/2019	JW	Email correspondence with deft atty	\$750.00	0.20	\$150.00
06/28/2019	JW	Email Correspondence with deft atty re: depositions	\$750.00	0.10	\$75.00
07/01/2019	JW	Phone conference with expert	\$750.00	0.50	\$375.00
07/02/2019	JW	Email correspondence with expert, review retainer agreement	\$750.00	0.20	\$150.00
07/02/2019	JW	Email correspondence with deft atty re: amendment, settlement	\$750.00	0.20	\$150.00
07/02/2019	JW	Review class member Joseph Lowery Questionnaire	\$750.00	0.20	\$150.00
07/02/2019	JW	Draft stipulation to file SAC, proposed order, email correspondence with deft atty	\$750.00	0.30	\$225.00
07/03/2019	JW	Email correspondence with expert, review draft report	\$750.00	0.60	\$450.00
07/03/2019	JW	Finalize stipulation to file SAC, submit to court, email correspondence with deft atty re: rule 7-3 meet and confer	\$750.00	0.50	\$375.00
07/05/2019	JW	Phone conference with expert Tarter re: draft declaration	\$750.00	0.80	\$600.00
07/05/2019	JW	Review 7-5-19 order continuing the cert briefing & filing SAC	\$750.00	0.20	\$150.00
07/09/2019	JW	Phone conference with deft atty re: certification motion meet and confer	\$750.00	0.40	\$300.00
07/10/2019	JW	Phone Conference with co-counsel Spencer re: insurance coverage	\$750.00	0.20	\$150.00
07/10/2019	JW	Email correspondence with expert	\$750.00	0.20	\$150.00
07/11/2019	JW	Review 7-9-19 letter from Hiscox coverage counsel, draft response	\$750.00	2.20	\$1,650.00
07/12/2019	JW	Review documents from class member Lori Olguin	\$750.00	0.20	\$150.00

07/21/2019	JW	Draft declaration of Kara Sampson, email correspondence with client	\$750.00	0.40	\$300.00
07/21/2019	JW	Review & revise expert declaration, email correspondence with expert	\$750.00	2.50	\$1,875.00
07/21/2019	JW	Draft declaration of Kara Sampson, email correspondence with client	\$750.00	0.60	\$450.00
07/22/2019	JW	Email correspondence with client Sampson	\$750.00	0.10	\$75.00
07/22/2019	JW	Phone conference with expert Tarter	\$750.00	0.20	\$150.00
07/22/2019	JW	Email correspondence with client Munson	\$750.00	0.10	\$75.00
07/31/2019	JW	Phone conference with Hiscox coverage counsel re: insurance coverage, settlement	\$750.00	1.80	\$1,350.00
08/01/2019	JW	Email correspondence with client Sampson	\$750.00	0.10	\$75.00
08/02/2019	JW	Email correspondence with atty for Hiscox re: mediation	\$750.00	0.20	\$150.00
08/05/2019	JW	Review Answer to SAC & cross-claim against other debts by Midwest Recovery	\$750.00	0.40	\$300.00
08/05/2019	JW	Phone conference with atty for Hiscox re: mediation	\$750.00	0.30	\$225.00
08/05/2019	JW	Email correspondence with debt atty & atty for Hiscox re: settlement	\$750.00	0.20	\$150.00
08/07/2019	JW	Draft letter to client Sampson, email correspondence with client	\$750.00	0.20	\$150.00
08/07/2019	JW	Draft Franklin declaration for certification motion, email correspondence with client	\$750.00	1.00	\$750.00
08/07/2019	JW	Review documents from class member Kelly Ann Lopez	\$750.00	0.20	\$150.00
08/08/2019	JW	Email correspondence with debt atty & magistrate re: settlement conference	\$750.00	0.10	\$75.00
08/11/2019	JW	Email correspondence with client, review new documents	\$750.00	0.20	\$150.00
08/12/2019	JW	Email correspondence with client	\$750.00	0.20	\$150.00
08/13/2019	JW	Email correspondence with debt atty & court re: settlement conference	\$750.00	0.10	\$75.00
08/13/2019	JW	Email correspondence with client Munson	\$750.00	0.10	\$75.00
08/13/2019	JW	Email correspondence with all clients	\$750.00	0.20	\$150.00
08/13/2019	JW	Email Correspondence with client	\$750.00	0.20	\$150.00
08/15/2019	JW	Draft Motion for Class Certification	\$750.00	10.00	\$7,500.00
08/16/2019	JW	Draft Motion for Class Certification	\$750.00	11.00	\$8,250.00
08/17/2019	JW	Draft Motion for Class Certification	\$750.00	8.50	\$6,375.00
08/18/2019	JW	Finalize Motion for Class Certification, assemble all exhibits, declarations	\$750.00	5.50	\$4,125.00

08/19/2019	JW	Email correspondence with deft atty, review draft stipulation to continue class cert hearing	\$750.00	0.20	\$150.00
08/20/2019	JW	Email correspondence with deft atty, review draft stipulation to continue certification hearing	\$750.00	0.30	\$225.00
08/21/2019	JW	Review 8-21-19 order from court on class certification briefing, make future plans	\$750.00	0.30	\$225.00
08/22/2019	JW	Email correspondence with deft atty Coller re: settlement conference	\$750.00	0.10	\$75.00
08/23/2019	JW	Email correspondence with deft atty re: settlement	\$750.00	0.20	\$150.00
08/28/2019	JW	Review Questionnaire from class member Reginald Jones	\$750.00	0.10	\$75.00
08/28/2019	JW	Email correspondence with deft atty re: settlement	\$750.00	0.10	\$75.00
08/29/2019	MW	PARALEGAL Research policy limits demand law	\$165.00	1.40	\$231.00
09/02/2019	JW	Draft MSC Statement and Confidential Addendum	\$750.00	4.00	\$3,000.00
09/03/2019	JW	Review co-counsel revisions to the confidential MSC statement, revise and finalize	\$750.00	1.10	\$825.00
09/04/2019	JW	Review deft MSC Statement	\$750.00	1.10	\$825.00
09/04/2019	JW	Phone Conference with co-counsel	\$750.00	0.10	\$75.00
09/10/2019	JW	Email correspondence with clients	\$750.00	0.20	\$150.00
09/10/2019	JW	Email correspondence with client Sampson	\$750.00	0.10	\$75.00
09/10/2019	JW	Review and prepare for Settlement Conference tomorrow	\$750.00	1.00	\$750.00
09/10/2019	JW	Email correspondenc with client Munson	\$750.00	0.10	\$75.00
09/11/2019	JW	Research insurance coverage issues based on developments at the MSC	\$750.00	1.50	\$1,125.00
09/11/2019	JW	Phone conference with co-counsel	\$750.00	0.70	\$525.00
09/11/2019	JW	Phone conference with expert Thomas Tarter	\$750.00	0.10	\$75.00
09/11/2019	JW	Email correspondence with deft atty re: amendment to complaint, depositions	\$750.00	0.40	\$300.00
09/11/2019	JW	Email correspondence with clients	\$750.00	0.10	\$75.00
09/11/2019	JW	Mandatory Settlement Conference, travel time	\$750.00	5.80	\$4,350.00
09/18/2019	JW	Phone conference with Branden Tumber	\$750.00	0.20	\$150.00
09/23/2019	JW	Research insurance coverage counsel Jay Levin	\$750.00	0.40	\$300.00

09/23/2019	JW	Email correspondence with insurance coverage counsel Levin, exchanged VM	\$750.00	0.20	\$150.00
09/24/2019	JW	Phone conference with insurance attorney Ashton re: case status and settlement	\$750.00	0.50	\$375.00
09/24/2019	JW	Exchanged Voicemail with coverage counsel Levin	\$750.00	0.10	\$75.00
09/25/2019	JW	Phone conference with insurance coverage counsel Levin re: settlement	\$750.00	0.50	\$375.00
09/25/2019	JW	Exchanged Voicemail with coverage counsel Levin	\$750.00	0.10	\$75.00
09/26/2019	JW	Email correspondence with deft atty re: depositions, amendment	\$750.00	0.20	\$150.00
09/27/2019	JW	Draft motion for leave to file Third Amended Complaint	\$750.00	3.00	\$2,250.00
09/27/2019	JW	Review and revise stipulation to continue cert motion again, email correspondence with deft atty	\$750.00	0.50	\$375.00
09/27/2019	JW	Email correspondence with deft atty re: deposition dates	\$750.00	0.20	\$150.00
09/28/2019	JW	Finalize motion for leave to file Third Amended Complaint, proposed order, chambers copy	\$750.00	0.50	\$375.00
09/30/2019	JW	Review & revise stipulation regarding briefing schedule, Email correspondence with deft atty re: depositions	\$750.00	0.40	\$300.00
10/02/2019	JW	Email correspondence with deft atty re: depositions	\$750.00	0.10	\$75.00
10/03/2019	JW	Email correspondence with deft atty re: depositions	\$750.00	0.30	\$225.00
10/03/2019	JW	Review tentative deposition notices	\$750.00	0.10	\$75.00
10/04/2019	JW	Phone conference with deft atty re: stipulation to continue	\$750.00	0.10	\$75.00
10/04/2019	JW	Email correspondence with deft atty re: stipulation to continue briefing, possible ex parte	\$750.00	0.20	\$150.00
10/04/2019	JW	Review Questionnaire from class member Lynette Ball	\$750.00	0.20	\$150.00
10/07/2019	JW	Email correspondence with deft atty re: depositions	\$750.00	0.20	\$150.00
10/07/2019	JW	Email Correspondence with Judge McCormick's clerk re: conference call	\$750.00	0.10	\$75.00
10/07/2019	JW	Email Correspondence with insurance counsel Levin	\$750.00	0.10	\$75.00
10/07/2019	JW	Email correspondence with clients	\$750.00	0.30	\$225.00
10/07/2019	JW	Email Correspondence with expert Tarter	\$750.00	0.20	\$150.00

10/07/2019	JW	Conference call with Magistrate Judge over discovery issues	\$750.00	0.30	\$225.00
10/08/2019	JW	Email Correspondence with deft atty re: depositions	\$750.00	0.30	\$225.00
10/08/2019	JW	Email Correspondence with Expert	\$750.00	0.30	\$225.00
10/08/2019	JW	Email Correspondence with client Munson	\$750.00	0.20	\$150.00
10/09/2019	JW	Email correspondence with clients	\$750.00	0.20	\$150.00
10/09/2019	JW	Review Defendant Ex parte application to continue class certification briefing	\$750.00	0.50	\$375.00
10/09/2019	JW	Draft response to Ex parte application to continue class certification briefing	\$750.00	1.00	\$750.00
10/09/2019	JW	Email correspondence with deft atty Coller	\$750.00	0.20	\$150.00
10/10/2019	JW	Email Correspondence with deft atty re: depositions	\$750.00	0.10	\$75.00
10/10/2019	JW	Review 10-10-19 order regarding certification briefing	\$750.00	0.20	\$150.00
10/10/2019	JW	Email correspondence with client Sampson	\$750.00	0.10	\$75.00
10/10/2019	JW	Email correspondence with client Franklin	\$750.00	0.10	\$75.00
10/11/2019	JW	Review revised deposition notices of Sampson & Franklin, email	\$750.00	0.40	\$300.00
10/11/2019	JW	correspnence with deft atty			
10/11/2019	JW	Email correspondence with expert	\$750.00	0.10	\$75.00
10/11/2019	JW	Email correspondence with clients Franklin & Sampson, prepare deposition preparation instructions and documents	\$750.00	2.00	\$1,500.00
10/12/2019	JW	Email Correspondence with client Sampson	\$750.00	0.10	\$75.00
10/12/2019	JW	Email Correspondence with client Franklin	\$750.00	0.10	\$75.00
10/13/2019	JW	Make plans for deposition trip in Sacramento	\$750.00	0.40	\$300.00
10/13/2019	JW	Email correspondence with client Franklin	\$750.00	0.20	\$150.00
10/15/2019	JW	Email correspondence with client Franklin, review additional documents	\$750.00	0.80	\$600.00
10/15/2019	JW	Email correspondence with deft atty re: document production, assemble doc production for deposition of Franklin	\$750.00	0.40	\$300.00
10/17/2019	JW	Travel time to Sacramento from office for Depositions of Franklin & Sampson	\$750.00	4.50	\$3,375.00
10/17/2019	JW	Phone conference with client Franklin	\$750.00	0.30	\$225.00
10/18/2019	JW	Depositions of Sampson & Franklin, travel time back to office	\$750.00	10.00	\$7,500.00

10/21/2019	JW	Email correspondence with client Munson	\$750.00	0.30	\$225.00
10/21/2019	JW	Email correspondence with deft atty re: deposition objections	\$750.00	0.30	\$225.00
10/21/2019	JW	Email correspondence with expert	\$750.00	0.20	\$150.00
10/21/2019	JW	Review deposition notices on Munson & Tarter, email correspondence with deft atty	\$750.00	0.20	\$150.00
10/23/2019	JW	Left VM for insurance coverage counsel Levin	\$750.00	0.10	\$75.00
10/23/2019	JW	Email correspondence with client Munson	\$750.00	0.10	\$75.00
10/23/2019	JW	Phone conference with deft atty re: settlement and discovery issues	\$750.00	1.50	\$1,125.00
10/24/2019	JW	Phone conference with insurance coverage counsel Levin	\$750.00	0.20	\$150.00
10/24/2019	JW	Phone conference with cllient Munson, email correspondence with Munson	\$750.00	1.10	\$825.00
10/27/2019	JW	Email correspondence with expert	\$750.00	0.10	\$75.00
10/28/2019	JW	Phone conference with Expert	\$750.00	1.30	\$975.00
10/28/2019	JW	Email correspondence with deft atty re: continuing various dates	\$750.00	0.10	\$75.00
10/29/2019	JW	Email Correspondence with deft atty re: stipulation	\$750.00	0.10	\$75.00
10/30/2019	JW	Email correspondence with client Munson	\$750.00	0.10	\$75.00
10/30/2019	JW	Phone conference with Expert	\$750.00	0.60	\$450.00
10/30/2019	JW	Email correspondence with court reporter re: depo transcripts	\$750.00	0.10	\$75.00
10/30/2019	JW	Review submitted stipulation & proposed order to meet and confer on resetting various deadlines	\$750.00	0.10	\$75.00
10/30/2019	JW	Review draft stipulation to continue CMC deadlines, email correspondence with deft atty	\$750.00	0.30	\$225.00
10/31/2019	JW	Draft objections to deposition notices on Munson & Tarter, email correspondence with deft atty	\$750.00	2.00	\$1,500.00
11/01/2019	JW	Make travel plans for deposition of Munson & Expert	\$750.00	0.20	\$150.00
11/01/2019	JW	Email correspondence with deft atty re: discovery issues	\$750.00	0.30	\$225.00
11/02/2019	JW	Email Correspondence with expert	\$750.00	0.10	\$75.00
11/04/2019	JW	Email correspondence with deft atty re: expert deposition	\$750.00	0.10	\$75.00
11/04/2019	JW	Review transcripts of depositions of Mitchell Franklin & Kara Sampson	\$750.00	1.00	\$750.00

11/05/2019	JW	Review 11-5-19 order from court on future dates	\$750.00	0.10	\$75.00
11/07/2019	JW	Phone conference with client Munson	\$750.00	0.50	\$375.00
11/07/2019	JW	Travel time from office to Los Angeles for deposition	\$750.00	2.00	\$1,500.00
11/08/2019	JW	Depositions of Munson & Tarter, travel time from Los Angeles to office	\$750.00	9.00	\$6,750.00
11/09/2019	JW	Finalize TAC to be filed, draft summons	\$750.00	0.40	\$300.00
11/12/2019	JW	Review order regarding request for summons on TAC, revise summons on TAC & resubmit	\$750.00	0.30	\$225.00
11/15/2019	JW	Email correspondence with deft atty Coller re: future proceedings	\$750.00	0.20	\$150.00
11/15/2019	JW	Email correspondence with atty Levin for insured re: service of summons	\$750.00	0.10	\$75.00
11/18/2019	JW	Email correspondence with deft atty re: meet and confer statement	\$750.00	0.10	\$75.00
11/19/2019	JW	Email correspondence with deft atty re: CMC meet and confer	\$750.00	0.10	\$75.00
11/19/2019	JW	Phone conference with co-counsel Spencer	\$750.00	0.30	\$225.00
11/20/2019	JW	Email correspondence with deft atty re: meet and confer	\$750.00	0.10	\$75.00
11/21/2019	JW	Left message for insurance coverage counsel Levin	\$750.00	0.10	\$75.00
11/21/2019	JW	Left phone message for Kathyry Ashton	\$750.00	0.10	\$75.00
11/21/2019	JW	Phone conference with deft atty Coller for joint status report	\$750.00	1.40	\$1,050.00
11/22/2019	JW	Review and revise draft stipulation for EOT to respond to the TAC	\$750.00	0.30	\$225.00
11/22/2019	JW	Email correspondence with clients	\$750.00	0.20	\$150.00
11/27/2019	JW	Email correspondence with the court reporter re: Munson/Tarter transcripts	\$750.00	0.10	\$75.00
11/27/2019	JW	Review order granting EOT on Answer to TAC	\$750.00	0.10	\$75.00
12/02/2019	JW	Email correspondence with court reporter re: Munson/Tarter depositions	\$750.00	0.10	\$75.00
12/11/2019	JW	Email with class member Reginald Jones	\$750.00	0.20	\$150.00
12/12/2019	JW	Left phone message for Kathyry Ashton re: insurance coverage issues	\$750.00	0.10	\$75.00
12/12/2019	JW	Left message for insurance coverage counsel Levin re: coverage	\$750.00	0.10	\$75.00
12/12/2019	JW	Email correspondence with deft atty Coller re: Joint Status Report	\$750.00	0.10	\$75.00

12/12/2019	JW	Left phone message for deft atty Coller re: Joint Status Report	\$750.00	0.10	\$75.00
12/13/2019	JW	Email correspondence with Hiscox attorney re: settlement, coverage issues	\$750.00	0.20	\$150.00
12/13/2019	JW	Left phone message for coverage counsel Jay Levin	\$750.00	0.10	\$75.00
12/16/2019	JW	Email correspondence with deft atty re: Joint Status Report	\$750.00	0.20	\$150.00
12/17/2019	JW	Email Correspondence with deft atty re: Joint CMC	\$750.00	0.10	\$75.00
12/18/2019	JW	Phone conference with deft atty re: insurance coverage	\$750.00	0.10	\$75.00
12/23/2019	JW	Draft Joint Status Report, Revised Scheduling Order, email correspondence with deft atty	\$750.00	1.10	\$825.00
12/24/2019	JW	Initial review of Motion to Dismiss UCL Claims	\$750.00	0.40	\$300.00
12/25/2019	JW	Review Veritext invoice for Munson & Tarter depositions, pay	\$750.00	0.20	\$150.00
12/26/2019	JW	Email correspondence with deft atty re: ongoing violations	\$750.00	0.10	\$75.00
12/26/2019	JW	Phone conference with class member Daugherty re: ongoing violations	\$750.00	0.40	\$300.00
12/29/2019	JW	Review defense expert report	\$750.00	1.00	\$750.00
12/30/2019	JW	Email correspondence with expert	\$750.00	0.20	\$150.00
12/30/2019	JW	Exchanged messages with insurance counsel Levin	\$750.00	0.10	\$75.00
12/31/2019	JW	Exchanged messages with insurance counsel Levin	\$750.00	0.10	\$75.00
01/03/2020	JW	Review revisions to new proposed scheduling order, draft revisions, email correspondence with deft atty	\$750.00	0.30	\$225.00
01/03/2020	JW	Conference call with my expert	\$750.00	1.00	\$750.00
01/05/2020	JW	Review deft comments on draft 3, revise draft 4 of new scheduling order, email correspondence with deft atty	\$750.00	0.30	\$225.00
01/06/2020	JW	Email correspondence with court staff re: stipulation for dismissal of certain defendants	\$750.00	0.10	\$75.00
01/06/2020	JW	Review revised Joint Status Report, proposed Scheduling Order, revise & finalize, email correspondence with deft atty	\$750.00	0.40	\$300.00
01/06/2020	JW	Email correspondence with ADR Services re: mediation	\$750.00	0.10	\$75.00

01/11/2020	JW	Draft stipulation to dismiss two defendants, proposed order, email correspondence with deft atty	\$750.00	0.50	\$375.00
01/13/2020	JW	Email correspondence with deft atty re: dismissal of certain defendants	\$750.00	0.10	\$75.00
01/13/2020	JW	Draft Rule 41 notice of dismissal of two defendants	\$750.00	0.30	\$225.00
01/14/2020	JW	Review new Scheduling Order, make future plans	\$750.00	0.40	\$300.00
01/17/2020	JW	Review defense opposition to motion to certify, exhibits	\$750.00	1.10	\$825.00
01/18/2020	JW	Phone conference with Tom Tarter re: expert declaration	\$750.00	0.20	\$150.00
01/18/2020	JW	Email Correspondence with expert Tarter	\$750.00	0.10	\$75.00
01/21/2020	JW	Left voicemail for Jay Levin again & his assitant	\$750.00	0.10	\$75.00
01/21/2020	JW	Phone conference with expert Tarter	\$750.00	0.30	\$225.00
01/22/2020	JW	Jay Levin left message about status of his insurance coverage efforts	\$750.00	0.10	\$75.00
01/22/2020	JW	Email Correspondence with atty for Hiscox re: settlement	\$750.00	0.10	\$75.00
01/27/2020	JW	Draft reply to opposition to motion to certify	\$750.00	6.50	\$4,875.00
01/28/2020	JW	Draft reply to opposition to motion to certify, confer with expert	\$750.00	8.00	\$6,000.00
01/30/2020	JW	Draft reply to opposition to motion to certify, expert declaration	\$750.00	5.50	\$4,125.00
01/31/2020	JW	Email correspondence with deft atty re: expert witness payment for depo	\$750.00	0.10	\$75.00
01/31/2020	JW	Email correspondence with atty for Hiscox re: settlement	\$750.00	0.10	\$75.00
02/04/2020	JW	Email correspondence with Hiscox counsel, research new attorney for Hiscox	\$750.00	0.30	\$225.00
02/07/2020	JW	Draft Opposition to Motion to Dismiss UCL claims	\$750.00	3.00	\$2,250.00
02/08/2020	JW	Draft Opposition to Motion to Dismiss UCL claims	\$750.00	3.50	\$2,625.00
02/09/2020	JW	Review Spencer revision to opposition to motion to dismiss, make further revisions	\$750.00	0.30	\$225.00
02/11/2020	JW	Draft Opposition to Motion to Dismiss UCL claims	\$750.00	3.50	\$2,625.00
02/12/2020	JW	Finalize Opposition to Motion to Dismiss UCL claims	\$750.00	1.50	\$1,125.00
02/14/2020	JW	Email correspondence with clients	\$750.00	0.20	\$150.00
02/20/2020	JW	Phone conference with expert	\$750.00	0.10	\$75.00

02/21/2020	JW	Review deft reply to opposition to motion to dismiss UCL claim	\$750.00	0.30	\$225.00
03/05/2020	JW	Review order taking motion to dismiss under submission	\$750.00	0.10	\$75.00
03/09/2020	JW	Review order denying motion to dismiss part of UCL claim	\$750.00	0.30	\$225.00
03/12/2020	JW	Phone conference with deft atty Coller re: arbitration	\$750.00	0.30	\$225.00
03/12/2020	JW	Email Correspondence with insurance coverage counsel for defts re: settlement	\$750.00	0.10	\$75.00
03/16/2020	JW	Email correspondence with insurance counsel Morrow re: conference	\$750.00	0.10	\$75.00
03/17/2020	JW	Phone confenece with insurance coverage attorney Morrow	\$750.00	0.60	\$450.00
03/18/2020	JW	Phone conference with expert	\$750.00	0.20	\$150.00
03/18/2020	JW	Email correspnodence with clients	\$750.00	0.20	\$150.00
03/19/2020	JW	Review Midwest response to court order on bringing arbitration motion	\$750.00	0.20	\$150.00
03/19/2020	JW	Confer with co-counsel re: strategy	\$750.00	0.20	\$150.00
03/23/2020	JW	Review Answer to TAC and cross-claims	\$750.00	0.60	\$450.00
03/25/2020	JW	Email correspondence with client Sampson	\$750.00	0.10	\$75.00
04/03/2020	JW	Email Correspondence with client Munson	\$750.00	0.10	\$75.00
04/08/2020	JW	Email correspondence with insured's coverage counsel Levin re: denial of coverage	\$750.00	0.20	\$150.00
04/08/2020	JW	Review 4-6-20 letter from Wilson Elsor to Jay Levin re: refusal to settle above policy limits	\$750.00	0.30	\$225.00
06/29/2020	JW	Draft request for hearing	\$750.00	0.40	\$300.00
07/02/2020	JW	Email correspondence with deft atty re: pre-trial dates	\$750.00	0.10	\$75.00
07/02/2020	JW	Review 7-2-20 order setting continued hearing on class cert	\$750.00	0.10	\$75.00
07/03/2020	JW	Email correspondence with deft atty re: new violations by Midwest as reported by Amanda Milldrum	\$750.00	0.20	\$150.00
07/03/2020	JW	Email correspondence with deft atty Coller re: changing pretrial dates	\$750.00	0.10	\$75.00
07/03/2020	JW	Phone conference with Amanda Milldrum, possible class member with claims not included in case based on new violations	\$750.00	0.40	\$300.00

07/04/2020	JW	Email correspondence with co-counsel re: new filings	\$750.00	0.10	\$75.00
07/06/2020	JW	Email correspondence with expert Tarter	\$750.00	0.10	\$75.00
07/08/2020	JW	Email correspondence with deft atty re: new scheduling order	\$750.00	0.10	\$75.00
07/08/2020	JW	Email correspondence with deft atty re: new violations	\$750.00	0.10	\$75.00
07/08/2020	JW	Email Correspondence with ADR Services re: mediation	\$750.00	0.10	\$75.00
07/13/2020	JW	Email correspondence with deft atty, review settlement offer	\$750.00	0.20	\$150.00
07/16/2020	JW	Draft stipulation, proposed second revised Scheduling Order, calculate new dates	\$750.00	1.00	\$750.00
07/22/2020	JW	Email correspondence with deft atty re: revise Scheduling Order	\$750.00	0.10	\$75.00
07/27/2020	JW	Email Correspondence with ADR Services re: mediation	\$750.00	0.10	\$75.00
07/27/2020	JW	Email correspondence with deft atty re: scheduling order & other issues	\$750.00	0.50	\$375.00
07/29/2020	JW	Email correspondence with ADR services re: mediation	\$750.00	0.10	\$75.00
08/10/2020	JW	Email Correspondence with ADR Services re: mediation	\$750.00	0.10	\$75.00
08/11/2020	JW	Email correspondence with ADR Services re: mediation	\$750.00	0.10	\$75.00
08/13/2020	JW	Email correspondence with clients re: mediation	\$750.00	0.20	\$150.00
08/17/2020	JW	Draft Mediation Brief	\$750.00	3.00	\$2,250.00
08/18/2020	JW	Email correspondence with ADR Services, phone conference with case manager, re: Mediation	\$750.00	0.40	\$300.00
08/19/2020	JW	Email correspondence with clients	\$750.00	0.20	\$150.00
08/19/2020	JW	Review Zoom instructions for mediation	\$750.00	0.10	\$75.00
08/24/2020	JW	Mediation	\$750.00	7.00	\$5,250.00
08/31/2020	JW	Email correspondence with deft atty re: settlement & scheduling order dates	\$750.00	0.20	\$150.00
09/01/2020	JW	Email correspondence with co-counsel	\$750.00	0.10	\$75.00
09/01/2020	JW	Review deft ex parte application to extend deadline for MSJ	\$750.00	0.40	\$300.00
09/01/2020	JW	Email correspondence with clients	\$750.00	0.10	\$75.00
09/02/2020	JW	Confer with co-counsel, revise opposition to motion for EOT to file MSJ	\$750.00	1.00	\$750.00
09/09/2020	JW	Phone conference with mediator Ben-Zvi	\$750.00	0.50	\$375.00
09/10/2020	JW	Email correspondence with deft atty & court re: ex parte application	\$750.00	0.10	\$75.00

09/11/2020	JW	Email correspondence with deft atty re: MSJ	\$750.00	0.10	\$75.00
09/11/2020	JW	Phone conference with deft atty re: MSJ & settlement	\$750.00	0.60	\$450.00
09/11/2020	JW	Email correspondence with deft atty re: MSJ, research cited authorities and argument	\$750.00	0.80	\$600.00
09/14/2020	JW	Draft notices of depositions of Smith, Tumber & Conway	\$750.00	0.40	\$300.00
09/16/2020	JW	Review ex parte ruling on motion to adjust scheduling order, email correspondence with deft atty to change plans	\$750.00	0.40	\$300.00
09/20/2020	JW	Draft Motion to Revise Scheduling Order	\$750.00	9.50	\$7,125.00
09/23/2020	JW	Email correspondence with mediator re: settlement proposals	\$750.00	0.20	\$150.00
09/25/2020	JW	Phone Conference with co-counsel	\$750.00	0.20	\$150.00
09/28/2020	JW	Email correspondence with deft atty Coller re: meet and confer on applicatino forr OST	\$750.00	0.10	\$75.00
09/28/2020	JW	Email correspondence with deft atty Coller re: settlement	\$750.00	0.10	\$75.00
09/29/2020	JW	Email correspondence with deft atty re: ex parte for OST	\$750.00	0.10	\$75.00
09/29/2020	JW	Review order transferring case to Judge Blumenfeld, Jr., research new Judge	\$750.00	0.40	\$300.00
10/01/2020	JW	Email correspondence with deft atty re: scheduling conference dates	\$750.00	0.20	\$150.00
10/01/2020	JW	Email correspondence with deft atty re: OST on motion to reset schedule	\$750.00	0.10	\$75.00
10/06/2020	JW	Draft ex parte application for OST, declaration, proposed order	\$750.00	4.00	\$3,000.00
10/08/2020	JW	Review deft opposition to ex parte for OST	\$750.00	0.40	\$300.00
10/09/2020	JW	Review 10-9-20 order denying ex parte application	\$750.00	0.20	\$150.00
10/10/2020	JW	Email correspondence with deft personal counsel Levin	\$750.00	0.20	\$150.00
10/12/2020	JW	Email correspondence with deft atty Coller re: in limine motions	\$750.00	0.20	\$150.00
10/12/2020	JW	Email correspondence with atty Levin re: covenant not to execute	\$750.00	0.10	\$75.00
10/13/2020	JW	Review 10-13-20 order moving cert hearing to December	\$750.00	0.20	\$150.00
10/15/2020	JW	Email correspondence with deft atty re: in limine motions	\$750.00	0.10	\$75.00

10/16/2020	JW	Email correspondence with insured's private counsel	\$750.00	0.20	\$150.00
10/19/2020	JW	Email correspondence with atty Levin re: individual defendants	\$750.00	0.20	\$150.00
10/19/2020	JW	Email Correspondence with clients	\$750.00	0.20	\$150.00
10/24/2020	JW	Review In Limine Motions by Defendants	\$750.00	0.50	\$375.00
10/29/2020	JW	Draft Opposition to In Limine Motions by Defendants	\$750.00	3.50	\$2,625.00
10/30/2020	JW	Finish Opposition to In Limine Motions by Defendants	\$750.00	1.00	\$750.00
10/30/2020	JW	Hearing on Motion for Class Certification via Zoom	\$750.00	1.00	\$750.00
11/04/2020	JW	Review 11-4-20 order resetting pretrial conference, plan for ptc	\$750.00	0.20	\$150.00
11/17/2020	JW	Review 11-17-20- order rescheduling hearing on motion in limine	\$750.00	0.20	\$150.00
12/04/2020	JW	Review FTC consent judgment with Midwest Recovery	\$750.00	0.30	\$225.00
12/04/2020	JW	Email correspondence with atty Levin	\$750.00	0.10	\$75.00
12/05/2020	JW	Draft email to atty for Midwest Recovery Systems from FTC case	\$750.00	0.30	\$225.00
01/18/2021	JW	Review statement of undisputed facts, prepare opposing statement	\$750.00	4.50	\$3,375.00
01/25/2021	JW	Draft Opposition to MSJ, Additional statement of genuine issues	\$750.00	6.00	\$4,500.00
01/26/2021	JW	Draft Opposition to MSJ, Additional statement of genuine issues	\$750.00	4.00	\$3,000.00
01/27/2021	JW	Draft Opposition to MSJ, Additional statement of genuine issues	\$750.00	10.00	\$7,500.00
01/28/2021	JW	Draft Opposition to MSJ, Additional statement of genuine issues	\$750.00	10.00	\$7,500.00
01/29/2021	JW	Draft Opposition to MSJ, Additional statement of genuine issues, exhibits	\$750.00	8.00	\$6,000.00
01/29/2021	JW	Email correspondnce with deft atty re: pre-trial conference meet & confer	\$750.00	0.10	\$75.00
02/02/2021	JW	Review opposition to motion to revise scheduling order	\$750.00	1.00	\$750.00
02/02/2021	JW	Draft Reply to opposition to motion to revise scheduling order	\$750.00	3.20	\$2,400.00
02/02/2021	JW	Email correspondence with deft atty re: pre-trial conference	\$750.00	0.10	\$75.00
02/04/2021	JW	Email correspondence with court clerk re: pre-trial conference	\$750.00	0.10	\$75.00
02/04/2021	JW	Email correspondence with deft atty re: pre-trial conference	\$750.00	0.10	\$75.00

02/04/2021	JW	Phone conference with deft atty, confer on pre-trial documents & settlement	\$750.00	1.30	\$975.00
02/05/2021	JW	Finalize stipulation to continue pretrial conference, proposed order	\$750.00	0.40	\$300.00
02/05/2021	JW	Draft stipulation to continue Pretrial conference	\$750.00	0.40	\$300.00
02/05/2021	JW	Email correspondence with deft atty re: pre-trial conference	\$750.00	0.10	\$75.00
02/08/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.20	\$150.00
02/08/2021	JW	Draft letter to class members after denial of cert of main class	\$750.00	0.80	\$600.00
02/09/2021	JW	Email correspondence with deft atty re: joint settlement statement, draft revisions, research right to jury in light of court's certification ruling	\$750.00	0.70	\$525.00
02/09/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.10	\$75.00
02/09/2021	JW	Email correspondence with deft atty re: class notice	\$750.00	0.10	\$75.00
02/10/2021	JW	Review settlement offer from deft atty, confer with co-counsel, draft counteroffer	\$750.00	0.30	\$225.00
02/16/2021	JW	Review 2-16-21 OSC re: settlement	\$750.00	0.10	\$75.00
02/17/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.10	\$75.00
02/17/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.30	\$225.00
02/18/2021	JW	Email Correspondence with deft atty re: settlement, additional class members	\$750.00	0.20	\$150.00
02/26/2021	JW	Review and Revise draft 1 of settlement agreement to draft 2	\$750.00	1.10	\$825.00
02/28/2021	JW	Email correspondence with client Munson	\$750.00	0.20	\$150.00
02/28/2021	JW	Email correspondence with client Franklin	\$750.00	0.10	\$75.00
03/08/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.10	\$75.00
03/10/2021	JW	Email correspondence with client Munson	\$750.00	0.10	\$75.00
03/15/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.10	\$75.00
03/15/2021	JW	Email correspondence with deft atty re: settlement, review revisions to settlement agreement & state position	\$750.00	0.40	\$300.00
03/16/2021	JW	Email correspondence with deft atty re: class settlement	\$750.00	0.30	\$225.00
03/17/2021	JW	Draft Franklin individual settlement, email correspondence with deft atty	\$750.00	0.40	\$300.00

03/17/2021	JW	Draft class notice	\$750.00	1.10	\$825.00
03/23/2021	JW	Review revisions to settlement agreement, class notice, individual settlement, draft further revision, email correspondnece with deft atty	\$750.00	1.70	\$1,275.00
03/23/2021	JW	Email correspondence with deft atty re: settlement	\$750.00	0.20	\$150.00
03/28/2021	JW	Draft status report to court in response to OSC re dismissal	\$750.00	0.90	\$675.00
03/30/2021	JW	Email correspondence with deft atty Coller re: settlement	\$750.00	0.20	\$150.00
03/30/2021	JW	Email correspondence with deft atty re: settlement, revise proposed final judgment, settlement agreements	\$750.00	0.40	\$300.00
03/31/2021	JW	Review and revise settlement agreemetns, email correspondence with deft atty	\$750.00	0.70	\$525.00
04/03/2021	JW	Email correspondence with client Munson	\$750.00	0.10	\$75.00
04/07/2021	JW	Review latest drafts of setltement agreements, exhibits, email correspondence with deft atty	\$750.00	0.50	\$375.00
04/07/2021	JW	Email Correspondence with deft atty re: settlement	\$750.00	0.10	\$75.00
04/08/2021	JW	Email correspondence with client Franklin	\$750.00	0.10	\$75.00
04/08/2021	JW	Email correspondence with client Franklin	\$750.00	0.10	\$75.00
04/12/2021	JW	Draft motion for Preliminary Approval	\$750.00	4.00	\$3,000.00
04/13/2021	JW	Draft motion for Preliminary Approval	\$750.00	2.50	\$1,875.00
04/14/2021	JW	Draft motion for Preliminary Approval	\$750.00	2.00	\$1,500.00
04/15/2021	JW	Draft motion for Preliminary Approval, Wilens Declaration, revise proposed order	\$750.00	1.00	\$750.00
04/16/2021	JW	Email correspondence with Deft atty re: signature pages for settlement	\$750.00	0.10	\$75.00
04/22/2021	JW	Review orders from court vacating OSC re settlement & continuing hearing on preliminary approval to 5-21-21	\$750.00	0.20	\$150.00
05/05/2021	JW	Draft amended proposed order granting preliminary approval	\$750.00	0.30	\$225.00
05/11/2021	JW	Revise & resubmit motoin for preliminary approval per court order of 5-11-21	\$750.00	0.80	\$600.00
05/17/2021	JW	Review 5-17-21 minute order on preliminary approval hearing	\$750.00	0.10	\$75.00
05/27/2021	JW	Email correspondence with CPT re: class notice, provide notice in Word	\$750.00	0.10	\$75.00
05/27/2021	JW	Review and prepare modified restitution class list for CPT Group & send to them	\$750.00	0.40	\$300.00

05/27/2021	JW	Review CPT draft CAFA notice, request for settlement documents	\$750.00	0.20	\$150.00
06/01/2021	JW	Email correspondence with CPT re: CAFA notice	\$750.00	0.10	\$75.00
06/01/2021	JW	Email correspondence with CPT, send requested documents	\$750.00	0.20	\$150.00
06/02/2021	JW	Review draft 2 CAFA notice, approve	\$750.00	0.20	\$150.00
06/09/2021	JW	Review list of possible duplicate class members, investigate and notify CPT Group of my analysis	\$750.00	0.40	\$300.00
06/14/2021	JW	Email correspondence with CPT re: class notice	\$750.00	0.10	\$75.00
06/16/2021	JW	Email correspondence with CPT Group & deft atty re: need to correct possible error is class restitution list and class notice website domain selectino	\$750.00	0.30	\$225.00
06/18/2021	JW	Review draft notice CPT will be mailing, sent comments to CPT	\$750.00	0.20	\$150.00
06/22/2021	JW	Email correspondence with CPT re: class notice & website	\$750.00	0.20	\$150.00
06/25/2021	JW	Review 6-25-21 weekly report from CPT re: class notice	\$750.00	0.10	\$75.00
07/02/2021	JW	Review weekly report on class notice	\$750.00	0.10	\$75.00
07/09/2021	JW	Review weekly report on class notice	\$750.00	0.10	\$75.00
07/17/2021	JW	Review weekly report on class notice from CPT	\$750.00	0.10	\$75.00
07/20/2021	JW	Draft Pleading/Motion Motion for Attorney's Fees, Costs and Incentive Award	\$750.00	4.00	\$3,000.00
07/20/2021	JW	Email correspondence with client	\$750.00	0.10	\$75.00
07/21/2021	JW	Draft Pleading/Motion Motion for Attorney's Fees and Incentive Award	\$750.00	4.00	\$3,000.00
Total Fees				392.30	\$291,066.00

Expenses

Date	Qty.	Description	Each	Amount
03/12/2021	1	Constant Contact monthly bill for class member data	\$45.00	\$45.00
11/05/2018	1	Court Call appearance fee	\$86.00	\$86.00
07/04/2019	1	Expert witness retainer for Thomas Tarter	\$4,000.00	\$4,000.00
11/09/2018	1	Firefly Legal failed service of process on Does 1 & 2	\$129.00	\$129.00
10/18/2019	1	Flight to/from Sacramento for depositions [paid with points, cash equivalent]	\$508.00	\$508.00
10/18/2019	1	Hotel accomodations Doubletree hotel for deposition paid with points (cash equivalent)	\$205.00	\$205.00
11/07/2019	1	Hotel accomodations Sheraton hotel for deposition paid with points (cash equivalent)	\$328.00	\$328.00

10/17/2019	1	Local travel (Lyft) airport to hotel for depositions in Sacramento	\$26.00	\$26.00
10/18/2019	1	Local travel (Lyft) from deposition to airport	\$32.00	\$32.00
10/18/2019	1	Local travel (Lyft) hotel to depositions in Sacramento	\$10.00	\$10.00
11/08/2019	1	Local travel (train) to/from office to los angeles deposition site, parking at train station	\$28.00	\$28.00
08/24/2020	1	Mediation fee Plaintiff's share for time beyond the free 3 hours (billed in two parts)	\$1,500.00	\$1,500.00
01/08/2019	1	One Legal fee deliver chambers copy Joint Report 26(f)	\$33.00	\$33.00
10/02/2019	1	One legal fee deliver chambers copy motion to amend	\$35.00	\$35.00
02/12/2019	1	One Legal fee deliver chambers copy Stipulation file FAC	\$31.00	\$31.00
08/21/2019	1	One Legal fee to deliver chambers copy motion for class certification	\$56.00	\$56.00
07/11/2018	1	One legal filing fee, complex designation fee	\$1,447.00	\$1,447.00
11/02/2018	1	One legal filing fee for Doe Amendments	\$14.00	\$14.00
07/12/2018	1	One legal filing fee for summons	\$12.00	\$12.00
10/08/2020	1	Overnight delivery of chambers copy of ex parte application	\$26.00	\$26.00
07/23/2018	1	Process server charge to serve complaint on deft	\$65.00	\$65.00
12/25/2019	1	Veritext transcripts of Munson & Tarter	\$1,207.00	\$1,207.00
12/04/2019	1	Veritext transcripts of Sampson & Franklin depositions	\$876.00	\$876.00
Total Expenses				\$10,699.00

Total Fees and Expenses	\$301,765.00
Previous Balance	\$0.00
Payments Received	\$0.00
Balance Now Due	\$301,765.00

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEAN L. GILBERT, et al.,
Plaintiffs,
v.
MONEYMUTUAL, LLC, et al.,
Defendants.

Case No. [13-cv-01171-JSW](#)

**ORDER GRANTING MOTIONS FOR
FINAL APPROVAL AND FOR
ATTORNEYS' FEES COSTS AND
INCENTIVE AWARDS AND ENTRY
OF JUDGMENT**

Re: Dkt. Nos. 484, 485

Now before the Court for consideration are the motions for final approval of a class action settlement and for attorneys' fees, costs, and incentive awards, filed by the Plaintiffs in this case. The Court has considered the parties' papers, the lack of opposition or objections to the motions, relevant legal authority, and the record in this case. The Court held a final fairness hearing on June 19, 2020, and no objectors were present at that hearing. This Order incorporates by reference the definitions in the Settlement Agreement, and all terms used in this Order shall have the same meanings as set forth in the Agreement. For the reasons that follow, the Court GRANTS both motions and enters judgment.

On February 28, 2016, the Court certified the following class on all claims except for Plaintiffs' claim for alleged violation of the fraud prong of California's Unfair Competition Law:

All California residents who received a 'payday loan' from an UNLICENSED LENDER on or after February 11, 2009 by using any website affiliated with or in response to an email from MoneyMutual, LLC or Selling Source, LLC or one of its subsidiaries. Any lender owned by an American Indian Tribe during the entire Class Period is excluded.

(Dkt. No. 257).

Subsequently and pursuant to Court order, Plaintiffs provided class notice by email and

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1 Internet advertising to 562,202 class members. Requests for exclusion were made by two class
2 members: Kalikhia Miller and Peter Castillo.

3 In the motion for preliminary approval, based on financial issues with Defendants’ ability
4 to pay any large judgment, the Court approved a modification in the class definition for the
5 Settlement Class. The original approved class was divided into an Injunction Class and a
6 Damages Subclass. The Injunction Class is:

7 All California residents who received a ‘payday loan’ from the one
8 of the 109 UNLICENSED LENDERS on or after February 11, 2009
9 by using any website affiliated with or in response to an email from
MoneyMutual, LLC or Selling Source, LLC or one of its
subsidiaries.

10 This is essentially the original certified class with the payday loan companies specifically
11 identified and counted, and the tribal lenders are excluded from the list. The Damages Subclass is:

12 All members of the Injunction Class who received a loan from and
13 paid money to the CASH YES or RARE MOON Lenders. The only
14 Cash Yes Lender is ‘Cash Yes.’ The Rare Moon Lenders are VIP
15 PDL SERVICES, LLC aka VIP Loan Shop, SCS PROCESSING,
16 LLC aka Everest Cash Advance, ACTION PDL SERVICES, LLC
aka Action Payday, BD PDL SERVICES, LLC aka Bottom Dollar
Payday aka BD PDL Services.com LLC, INTEGRITY PDL
SERVICES, LLC aka Integrity Payday Loans aka IPL Today, Fast
EFNDS, LLC aka Fast Efunds, and MB Marketing, LLC.

17 This is a subclass of the larger class limited to those who are documented as actually
18 paying money to payday loan companies. Information about actual payments was only available
19 for the Cash Yes and Rare Moon Lenders because the information had to be subpoenaed from
20 existing third parties and most of the lenders went out of business several years ago.

21 The Injunction Class is certified pursuant to Rule 23(b)(2). The Damages Class is certified
22 pursuant to Rule 23(b)(3). The Court now finds that that (a) the Settlement Classes are
23 ascertainable and so numerous that joinder of all Settlement Class Members in the Action is
24 impracticable; (b) there are questions of law and fact common to the Settlement Classes; (c) the
25 claims of Representatives Plaintiffs Sean L. Gilbert, Keeya Malone, Kimberly Bilbrew and
26 Charmaine B. Aquino are typical of those of the Classes; (d) Representative Plaintiffs Sean L.
27 Gilbert, Keeya Malone, Kimberly Bilbrew and Charmaine B. Aquino and Representative
28 Plaintiffs’ Counsel Jeffrey Wilens and Jeffrey Spencer have fairly and adequately represented and

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1 protected the interests of the Settlement Classes; (e) a class action is superior to other available
2 methods for the fair and efficient adjudication of the controversy; and (f) the common questions of
3 law and fact predominate over any individual questions.

4 Jeffrey Wilens of the Lakeshore Law Center are Jeffrey Spencer of Spencer Law Firm are
5 confirmed to be class counsel. Sean L. Gilbert, Keeya Malone, Kimberly Bilbrew and Charmaine
6 B. Aquino are confirmed to be class representatives on the Injunction Class and Damages
7 Subclass.

8 The Court previously approved the form of Settlement Notice and the proposed manner of
9 its distribution to Settlement Class Members. (*See* Dkt. No. 483.) The Court reaffirms that
10 approval. The Court also approved the appointment of CPT Group as Class Settlement
11 Administrator. After removing duplicates from the class list, CPT determined there are 17,222
12 class members.

13 On March 20, 2020, CPT provided the required notices under the Class Action Fairness
14 Act. On March 20, 2020, CPT provided notice by mail to each of the subclass members. Only 192
15 notices were returned to the sender and some of those were subsequently remailed. Only seven
16 notices were ultimately determined to be undeliverable. Between March 24, 2020 and April 29,
17 2020, CPT provided notice by email three times to subclass members. The emailed notice was
18 received by 65.9% of the subclass members.

19 The Court finds the required notice to Class Members was provided and it was effective at
20 informing subclass members of this settlement. The deadline for objecting to the settlement or
21 opting out was May 28, 2020. There was an adequate interval between notice and the deadline to
22 permit subclass members to choose to object and to take the necessary actions to implement their
23 decision. No class members have objected to the settlement. One person, the Law Firm of
24 Buxbaum & Chakmak, attempted to submit an “opt-out” on behalf of a deceased class member,
25 Brian J. Robbins. The Settlement Administrator has contacted the law firm to determine whether
26 it has authority to act in this fashion and whether it intended to exclude the decedent from the
27 settlement. It never responded. However, since no claim was submitted for Mr. Robbins by his
28 Estate, it is reasonable to honor the request for exclusion made by a law firm on his behalf.

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1 The Court further finds CPT established in timely fashion a Claims Website used to assist
2 subclass Members in submitting claims and to host copies of relevant court documents, including
3 the Settlement Agreement, Preliminary Approval Order, Long-Form Class Notice, a printable
4 version of the Claim Form, and an electronic version of the Claim Form.

5 The deadline to submit a claim is August 26, 2020. As of June 19, 2020, 941 persons have
6 submitted claims although 30 are deficient and the class member is being given the opportunity to
7 correct the deficiency.

8 The Settlement provides for payment of up to \$1,000,000 to Class Counsel as attorney's
9 fees and up to \$200,000 in costs and expenses in the actions, subject to the Court's approval.
10 Class Counsel including paralegals have spent in excess of 3,534 hours working on this case and
11 the related *Pham* action, a reasonable amount of time given the nature of the case and the claims at
12 issue in the action. Class Counsel's normal hourly rates are \$750 for Jeffrey Spencer and \$750 for
13 Jeffrey Wilens. These hourly rates are within the range of hourly fees reasonably and normally
14 charged by attorneys in this area of comparable experience in cases of similar nature and
15 complexity. The hourly rates charged for paralegals and associate attorneys were between \$125
16 and \$200, which rates are reasonable. Representative Plaintiff's Counsel also paid litigation costs
17 and expenses in the amount of \$160,822.

18 The Court concludes that, on the facts of this case, an award of \$1,000,000 in attorneys'
19 fees and \$160,822 in costs and expenses is reasonable. Under the lodestar method, the award
20 represents 42.4 % of their lodestar amounts, *i.e.*, a negative multiplier. The Settlement provides
21 for a payments of incentive awards up to the following amounts: Class representatives in the
22 Gilbert Action, Plaintiffs Sean L. Gilbert, Keeya Malone, Kimberly Bilbrew and Charmaine B.
23 Aquino, in the amount of \$10,000 each. The proposed class representatives in the *Pham* Action,
24 Plaintiffs Dinah Pham, Paula Bernal, Mary F. Bailey, Irma R. Candaza, and Anna Rae Martinez,
25 were to be provided \$5,000 each. The Court concludes the amount of the payment is reasonable in
26 light of the risks, burdens and responsibilities undertaken by the named plaintiffs in the *Gilbert*
27 and *Pham* actions. They spent substantial time assisting the prosecution of the case and incurred
28 substantial risks. The payment of an incentive award in the amounts stated above does not unduly

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1 favor the representative plaintiffs or the *Pham* plaintiffs. The requested incentive awards are
2 reasonable and justified.

3 Accordingly, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that for
4 purposes of the Action, the Court has subject matter and personal jurisdiction over the Settling
5 Parties, including all Settlement Class Members.

6 The Effective Date of the Settlement is one court day after the date of filing unless there
7 has been a valid objection.

8 This Final Approval Order shall serve as a Judgment against Defendants MoneyMutual,
9 LLC, SellingSource, LLC, Glenn McKay, PartnerWeekly, LLC, Brian Rauch, John Hashman, and
10 Montel Brian Anthony Williams. In addition, the following defendants from the *Pham* action are
11 contracting parties to the Settlement Agreement: London Bay Capital, LLC, TSS Acquisition
12 Company, LLC, Samuel W. Humphreys, Douglas Tulley, and Alton F. Irby III.

13 Consistent with its prior order granting a motion for class certification and pursuant to
14 Rule 23(b)(2), the Court certifies the Injunction Class, comprised of: “All California residents who
15 received a ‘payday loan’ from the one of the 109 UNLICENSED LENDERS on or after February
16 11, 2009 by using any website affiliated with or in response to an email from MoneyMutual, LLC
17 or Selling Source, LLC or one of its subsidiaries.”

18 Consistent with its prior order granting a motion for class certification and pursuant to
19 Rule 23(b)(3), the Court certifies the Damages subclass, comprised of: “All members of the
20 Injunction Class who received a loan from and paid money to the CASH YES or RARE MOON
21 Lenders. The only Cash Yes Lender is ‘Cash Yes.’ The Rare Moon Lenders are VIP PDL
22 SERVICES, LLC aka VIP Loan Shop, SCS PROCESSING, LLC aka Everest Cash Advance,
23 ACTION PDL SERVICES, LLC aka Action Payday, BD PDL SERVICES, LLC aka Bottom
24 Dollar Payday aka BD PDL Services.com LLC, INTEGRITY PDL SERVICES, LLC aka Integrity
25 Payday Loans aka IPL Today, Fast EFNDS, LLC aka Fast Efunds, and MB Marketing, LLC.”

26 Brian J. Robbins is excluded from the Settlement Class.

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

1 of 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, Defendants shall not be estopped or otherwise precluded from moving to decertify the
4 previously class or otherwise defend against the Action.

5 As of the Effective Date, Plaintiffs and each subclass member who has not opted out
6 acknowledges full satisfaction of all Settled Claims (as defined below), and fully, finally and
7 forever release, settle and discharge Defendants, their present and former parents, stockholders,
8 investors, lenders (meaning those who made loans to Defendants not the payday lenders who
9 made loans to class members), subsidiaries, affiliates, predecessors, and successors and their
10 present and former officers, directors, insurers, employees, agents, heirs, spouses, personal
11 representatives, contractors, and attorneys (collectively, the “Released Persons”) from all Settled
12 Claims, known and unknown.

13 For purposes of this Judgment, “Settled Claims” means and includes any and all claims,
14 demands, rights, liabilities and causes of action arising from or related to the facts alleged in the
15 *Gilbert or Pham* Actions, including but not limited to any actual or alleged violation of the
16 California Deferred Deposit Transaction Law, Racketeering Influenced and Corrupt Organization
17 Act of 1970, and California’s Unfair Competition Law, Business and Professions Code sections
18 17200, *et seq.* “Settled Claims” includes no other claim related to the subclass member’s receipt
19 of a payday or installment loan including but not limited to claims for restitution or damages
20 against a payday lender, debt purchaser or collection agency. However, with respect to Plaintiffs,
21 “Settled Claims” include all claims, demands, rights, liabilities and causes of action that Plaintiffs
22 could have asserted against Released Parties as of the date this Agreement is fully executed.

23 As of the Effective Date, Plaintiffs further waive and relinquish, to the fullest extent
24 permitted by law and subject to the foregoing provisions, the benefits of California Civil Code
25 section 1542 and all similar state or federal statutes or rules of law. California Civil Code section
26 1542 provides: “A general release does not extend to claims that the creditor or releasing party
27 does not know or suspect to exist in his or her favor at the time of executing the release and that, if
28 known by him or her, would have materially affected his or her settlement with the debtor or

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1 released party.” The Parties understand and acknowledge that a risk exists that they incurred or
2 suffered or may incur or suffer loss or damages as a result of the matters, facts, events,
3 occurrences, transactions, causes, and things referred to in this Agreement, which were unknown,
4 unsuspected, or unanticipated at the times this Agreement was executed. The Parties each assume
5 this risk, and agree that the foregoing release shall, in all respects, be effective and not subject to
6 termination or rescission.

7 The Court awards attorney’s fees to Class Counsel collectively in the amount of
8 \$1,000,000: \$800,000 to Lakeshore Law Center and \$200,000 to Spencer Law Firm. This amount
9 shall be paid within 15 days of the Effective Date. The Court awards costs and expenses to Class
10 Counsel collectively in the amount of \$160,822, comprised of costs award to Lakeshore Law
11 Center in the amount of \$159,046 and a costs award to the Spencer Law Firm in the amount of
12 \$1,776. These amounts shall be paid within 15 days of the Effective Date.

13 The Court awards an incentive award in the amount of \$10,000 to each of the
14 Representative Plaintiffs in the Gilbert Action: Sean L. Gilbert, Keeya Malone, Kimberly Bilbrew
15 and Charmaine B. Aquino. The Court awards an incentive award in the amount of \$5,000 to each
16 of the proposed Representative Plaintiffs in the *Pham* Action: Dinah Pham, Paula Bernal, Mary F.
17 Bailey, Irma R. Candaza, and Anna Rae Martinez.

18 The Settlement Administrator, CPT Group may reimburse itself actual expenses not to
19 exceed \$60,000 from the Settlement Fund.

20 Once the deadline to submit claims has passed, and any disputed claims are resolved, CPT
21 is directed to commence distribution to subclass members who submitted valid claims within 30
22 days thereafter. The amount to be paid per valid claim will be \$675,000 divided by number of
23 valid claims. Currently, that would be approximately \$717 per claim. No claimant shall be paid
24 more than \$1,000; however, based on the number of claims as of this date, it is not a concern.
25 Payments shall be rounded to whole cents and any residue left from rounding will be retained by
26 the Settlement Administrator. These payments shall be deemed restitution of money they paid on
27 their payday loan(s). The payment shall be made by check mailed by the Settlement
28 Administrator directly to the claimant at the address specified in the Subclass Mailing List, unless

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1 that information has been subsequently updated in which case the most recent information shall be
2 used. Alternatively, claimants will be encouraged to provide banking information so they can be
3 paid through the ACH system. Each claimant’s payment check shall be valid for 120 days from
4 date of issuance and thereafter will become void. A Class Member may attempt to exchange a
5 void check for a reissued one by contacting the Settlement Administrator up to 150 days from date
6 of issuance.

7 If any settlement checks to claimants are returned to sender with a forwarding address, the
8 Settlement Administrator shall remail the checks to the specified address. If any settlement checks
9 are returned to sender without a forwarding address, the Settlement Administrator shall use “skip-
10 tracing” methods to develop a valid address and then will remail the compensation/refund check to
11 that address. If despite the foregoing efforts, some settlement checks are not cashed or deposited
12 within nine months of issuance, the Settlement Administrator shall submit those funds to the State
13 Controller’s Office under law as unclaimed property.

14 Any appellate challenge, reversal or future court order regarding the application for
15 attorneys’ fees and costs by Representative Plaintiff and Class Counsel shall in no way disturb or
16 affect this Judgment and shall be considered separate from this Judgment. Without affecting the
17 finality of this Judgment in any way, this Court hereby retains continuing jurisdiction over: (a)
18 implementation of this Settlement and any disputes concerning that implementation; (b) hearing
19 and determining applications for attorneys’ fees and costs in the Action; and (c) all parties hereto
20 solely for the purpose of construing, enforcing and administering the Settlement. The time to
21 appeal from the Judgment in this matter shall commence upon its entry.

22 In the event that the Settlement does not become effective in accordance with the terms of
23 the Settlement, then this Judgment shall be rendered null and void to the extent provided by and in
24 accordance with the Settlement and shall be vacated and, in such event, all orders entered and
25 releases delivered in connection with this Judgment shall be null and void to the extent provided
26 by and in accordance with the Settlement.

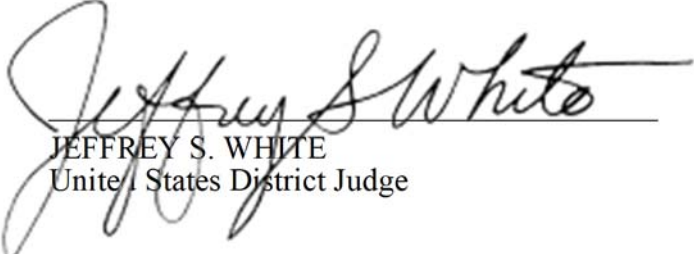
27 Neither the Stipulation nor the Settlement, including the agreement by Defendants to
28 stipulate for settlement purposes only to a Settlement Class, nor any act performed or document

1 executed pursuant to or in furtherance of the Stipulation or the Settlement: (a) is or may be
2 deemed to be or may be used as an admission of, or evidence of, the validity of any Settled Claim,
3 or of any wrongdoing or liability of the Defendants; (b) is or may be deemed to be or may be used
4 as an admission of, or evidence of, any fault or omission of the Defendants in any civil, criminal
5 or administrative proceeding in any court, administrative agency or other tribunal; or (c) shall
6 provide a basis for estopping or otherwise preventing Defendants from opposing class certification
7 in the Action or in any other case.

8 Notwithstanding the reservation of jurisdiction in Paragraph 50, this is a final and
9 appealable judgment that ends the litigation of all claims alleged in this Action, and the Clerk is
10 directed to close the file.

11 **IT IS SO ORDERED AND ADJUDGED.**

12 Dated: June 22, 2020


JEFFREY S. WHITE
United States District Judge

United States District Court
Northern District of California

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