

SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF CLARK

AMANDA DOUGHERTY, individually and as
a representative of the class,

Plaintiff,

v.

BARRETT BUSINESS SERVICES, INC.,

Defendant.

NO. 17-2-05619-1

**DECLARATION OF E. MICHELLE
DRAKE IN SUPPORT OF
PLAINTIFF'S MOTION FOR FEES,
COSTS, AND CLASS
REPRESENTATIVE SERVICE
AWARD**

I, E. MICHELLE DRAKE, declare as follows:

1. I am one of Class Counsel in the above-captioned matter.

2. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Class Representative Service Award.

3. I am a Shareholder at Berger Montague PC. I have been practicing law since 2001 and am a graduate of Harvard College, Oxford University, and Harvard Law School. In 2016, I joined Berger Montague as a Shareholder. Prior to joining Berger Montague, I was a partner at Nichols Kaster, PLLP, where I ran that firm's consumer protection group. This case began when I was at Nichols Kaster, PLLP and continued with me when I joined Berger Montague.

1 4. Berger Montague specializes in class action litigation and is one of the
2 preeminent class action law firms in the United States. The firm employs over 60 attorneys and
3 primarily represents plaintiffs in complex civil litigation in federal and state courts. Berger
4 Montague has played lead roles in major class action cases for over 48 years, and has obtained
5 settlement and recoveries totaling over \$30 billion for its clients and the classes they have
6 represented. A copy of the firm's resume is attached hereto as **Exhibit A**.

7 5. I serve as co-chair of the firm's Consumer Protection, Credit Reporting &
8 Background Checks, and Technology, Privacy & Data Breach practice groups. My practice
9 focuses on protecting consumers' rights when they are injured by improper credit reporting,
10 and other illegal business practices. I currently serve as lead or co-lead counsel in dozens of
11 class action consumer protection cases in federal and state courts across the country, including
12 numerous cases brought pursuant to the Fair Credit Reporting Act. A copy of my personal
13 resume is attached hereto as **Exhibit B**.

14 6. I serve on the Board of the National Association of Consumer Advocates, am a
15 member of the Partner's Council of the National Consumer Law Center, and am a Co-Chair of
16 the Consumer Litigation Section for the Minnesota State Bar Association. I have previously
17 served as a member of the Ethics Committee for the National Association of Consumer
18 Advocates, and as Treasurer and At-Large Council Member for the Consumer Litigation
19 Section of the Minnesota State Bar Association. I was also an appointee to the Federal Practice
20 Committee in 2010 by the U.S. District Court for the District of Minnesota.

21 7. I am consistently named to the annual lists of The Best Lawyers of America,
22 Top 50 Women Minnesota Super Lawyers, and Super Lawyers. I have been quoted in the New
23 York Times, the L.A. Times, Fortune, Bloomberg News and the National Law Journal. Two of
24 my cases have been named as "Lawsuits of the Year" by Minnesota Law & Politics.

25 8. I present frequently at national and local conferences on class actions, consumer
26 protection, and Fair Credit Reporting Act-related topics, and I co-authored a book chapter on

1 background checks and related issues, “Financial and Criminal Background Checks,” Job
2 Applicant Screening: A Practice Guide, Minnesota Continuing Legal Education Publication,
3 May 2014. My recent speaking engagements have included:

- 4 ▪ “Nationwide Settlement Classes – The Impact of the Hyundai/Kia Litigation,”
5 Class Action Symposium, Consumer Rights Litigation Conference, National
6 Consumer Law Center, Denver, CO, October 2018.
- 7 ▪ “Developments in Public Records Litigation,” Consumer Rights Litigation
8 Conference, National Consumer Law Center, Denver, CO, October 2018.
- 9 ▪ “Big Challenges in the City of BIG Shoulders, Electronic Discovery’s Rise to
10 Prominence,” ABA 22nd Annual National Institute on Class Actions, Chicago,
11 IL, October 2018.
- 12 ▪ “Jurisdiction Issues Post Bristol-Myers,” Bridgeport 2018 Class Action
13 Litigation Conference, San Francisco, CA, September 2018.
- 14 ▪ “New Developments in the Law of Personal Jurisdiction in the Aftermath of the
15 Supreme Court’s Decisions in BNSF Railway Co. v. Tyrrell and Bristol Myers
16 and the Strategies,” Plaintiffs’ Class Action Roundtable, Rancho Palos Verdes,
17 CA, April 2018.
- 18 ▪ “New Developments in Personal Jurisdiction,” Litigator’s Short Course,
19 Minnesota Continuing Legal Education, Minneapolis, MN, February 2018.
- 20 ▪ “Game Changing Blindspots that Create Privacy Liabilities – a Plaintiff-Side
21 Litigator’s Insights,” Midwest Legal Conference on Privacy & Data Security,
22 Minneapolis, MN, January 2018.
- 23 ▪ “Federal Discovery: Winning Your Cases Early,” & “FCRA Report Disclosures:
24 Issues and Litigation,” Consumer Rights Litigation Conference, National
25 Consumer Law Center, Washington, D.C., November 2017.
- 26 ▪ “Strategic Response to Recent Supreme Court Decision in *Bristol-Meyers*,”

1 Class Action Symposium, Consumer Rights Litigation Conference, National
2 Consumer Law Center, Washington, D.C., November 2017.

3 ■ “The Times They Are a-Changin’: The Role of Administrative Agencies and
4 Private Counsel in the Trump Era,” American Bar Association Annual National
5 Institute on Class Actions, Washington, D.C., October 2017.

6 ■ “The CFPB’s New Rule on Arbitration: What It Is and What Comes Next,”
7 Minnesota State Bar Association Continuing Legal Education, Minneapolis,
8 MN, September 2017.

9 ■ “Standing: Assessing Article III Jurisdiction One Year after Spokeo,” Minnesota
10 State Bar Association Continuing Legal Education, Minneapolis, MN, June
11 2017.

12 ■ “House Resolution 985 – Update and Strategies for Defeat,” Cambridge
13 Forums’ Plaintiffs’ Class Action Forum, Carefree, AZ, May 2017.

14 ■ “TCPA/FCRA/Debt Collection Issues,” PLI 22nd Annual Consumer Financial
15 Services Institute, Chicago, IL, May 2017.

16 ■ “Case Law and Recent Trial Update Panel,” Fair Credit Reporting Act
17 Conference, National Association of Consumer Advocates, Baltimore, MD,
18 April 2017.

19 9. I litigate cases throughout the United States and have been admitted to, and am a
20 member in good standing with, the following courts:

- 21 ■ United States Supreme Court, 2017
- 22 ■ State Bar of Georgia, 2001
- 23 ■ Georgia Supreme Court, 2006
- 24 ■ Minnesota Supreme Court, 2007
- 25 ■ U.S. Court of Appeals for the Eighth Circuit, 2010
- 26 ■ U.S. Court of Appeals for the First Circuit, 2011

- U.S. Court of Appeals for the Seventh Circuit, 2014
- U.S. Court of Appeals for the Ninth Circuit, 2015
- U.S. District Court for the Northern District of Georgia, 2007
- U.S. District Court for the District of Minnesota, 2007
- U.S. District Court for the Eastern District of Wisconsin, 2011
- U.S. District Court for the Western District of Texas, 2011
- U.S. District Court for the Western District of Wisconsin, 2015
- U.S. District Court for the Eastern District of Michigan, 2015
- U.S. District Court for the Central District of Illinois, 2016
- U.S. District Court for the Southern District of Texas, 2017
- U.S. District Court for the District of Colorado, 2017
- U.S. District Court for the Western District of New York, 2017

10. I have served as lead, or co-lead, class counsel in numerous notable consumer protection matters, including, but not limited to, the following:

Clark/Anderson v. Trans Union, LLC, No. 15-cv-391 & No. 16-cv-558 (E.D. Va.). FCRA consolidated class action, alleging violations by credit bureau, providing groundbreaking injunctive relief, and an opportunity to recover monetary relief, for millions of consumers.

Rubio-Delgado v. Aerotek, Inc., No. 16-cv-1066 (S.D. Ohio). FCRA class action, alleging violations by employer, resulting in a \$15 million settlement.

Knights v. Publix Super Markets, Inc., No. 14-cv-720 (M.D. Tenn.). FCRA class action, alleging violations by employer, resulting in a \$6.75 million settlement.

Hillson v. Kelly Services, Inc., No. 15-cv-10803 (E.D. Mich.). FCRA class action, alleging violations by employer, resulting in a \$6.749 million settlement.

Ernst v. DISH Network, LLC & Sterling Infosystems, Inc., No. 12-cv-8794 (S.D.N.Y.). FCRA class action, alleging violations by employer and consumer reporting agency, resulting in a \$4.75 million settlement with consumer reporting agency, and a \$1.75 million settlement with employer.

Howell v. Checkr, Inc., No. 17-cv-4305 (N.D. Cal.). FCRA class action, alleging violations by consumer reporting agency, resulting in a \$4.46 million settlement.

1 *Brown v. Delhaize America, LLC*, No. 14-cv-195 (M.D.N.C.). FCRA class action,
2 alleging violations by employer, resulting in \$2.99 million settlement.

3 *Nesbitt v. Postmates, Inc.*, No. CGC-15-547146 (Cal. Super. Ct., San Fran. Cnty.).
4 FCRA class action, alleging violations by employer, resulting in a \$2.5 million
5 settlement.

6 *Singleton v. Domino's Pizza, LLC*, No. 11-cv-1823 (D. Md.). FCRA class action,
7 alleging violations by employer, resulting in a \$2.5 million settlement.

8 *Heaton v. Social Finance, Inc.*, No. 14-cv-5191 (N.D. Cal.). FCRA class action,
9 alleging violations by lender, resulting in a \$2.5 million settlement.

10 *Terrell v. Costco Wholesale Corp.*, No. 10-2-33915-9 (Wash. Super. Ct., King Cnty.).
11 FCRA class action, alleging violations by employer, resulting in a \$2.49 million
12 settlement.

13 *Halvorson v. TalentBin, Inc.*, No. 15-cv-5166 (N.D. Cal.). FCRA class action, alleging
14 violations by online data aggregator, resulting in a \$1.15 million settlement.

15 *Legrand v. IntelliCorp Records, Inc.*, No. 15-cv-2091 (N.D. Ohio). FCRA class action,
16 alleging violations by consumer reporting agency, resulting in a \$1.1 million settlement.

17 *In re Target Corp. Customer Data Security Breach Litig.*, MDL No. 14-2522 (D.
18 Minn.). Data security breach class action, resulting in a \$10 million settlement for
19 consumers (approval currently pending on appeal).

20 11. My litigation efforts and experience have received judicial acknowledgement
21 and praise throughout the years of my practice. Examples of such recognition include:

22 From Judge Harold E. Kahn, Dep't 302, Superior Court of Cal., San Fran. Cnty.:

23 You're very articulate on this issue. ... Obviously, you're very
24 thoughtful and you have given it a great deal of thought. ... And I
25 appreciate your ability to respond to my questions off the cuff. ... It
26 shows that you have given these issues a lot of thought ... I have to say
that your thoughtfulness this morning has somewhat diminished my
concerns [regarding high multiplier on attorney fees]... You're
demonstrating credibility by a mile as you go....You are extraordinarily
impressive. And I thank you for being here, and for your candid,
noninvasive [sic] response to every question I have. I was extremely
skeptical at the outset this morning. You have allayed all of my concerns
and have persuaded me that this is an important issue, and that you have
done a great service to the class. And for that reason, I am going to

1 approve your settlement in all respects... And I congratulate you on your
2 excellent work.

3 Nov. 7, 2017, Final Approval Hearing, *Nesbitt v. Postmates, Inc.*, No. CGC-15-547146.

4 From Judge Laurie J. Michelson, United States District Court, E.D. Mich.:

5 Counsel's quality of work in this case was high. The Court has been
6 impressed with counsel's in-court arguments. And counsel has provided
7 the Court with quality briefing as well.

8 Aug. 11, 2017, Opinion & Order on Mtn. for Atty. Fees, and Mtn. for Final Approval,
9 *Hillson v. Kelly Services, Inc.*, No. 15-cv-10803.

10 From Magistrate Judge Terence P. Kemp, United States District Court, S.D. Ohio:

11 The parties in this case are represented by counsel with substantial
12 experience in class action litigation, and FCRA cases in particular. ...
13 Class Counsel are experienced and knowledgeable in FCRA litigation,
14 are skilled, and are in good standing.

15 June 30, 2017, Report & Recomm'n. on Final Approval, *Rubio-Delgado v. Aerotek,*
16 *Inc.*, No. 16-cv-1066.

17 From Judge Paul A. Magnuson, United States District Court, D. Minn.:

18 [T]he class representatives and their counsel more than adequately
19 protected the class's interests. ... [T]he comprehensive nature of the
20 settlement in turn, reflects the adequacy, indeed the superiority, of the
21 representation the class received from its named Plaintiffs and from class
22 counsel.

23 May 17, 2017, Mem. & Order on Mtn. to Certify Class, *In re Target Corp. Customer*
24 *Data Sec. Breach Litig.*, MDL No. 14-2522.

25 From Judge Paul A. Engelmayer, United States District Court, S.D.N.Y.:

26 The high quality of [plaintiffs' counsel]'s representation strongly
supports approval of the requested fees. The Court has previously
commended counsel for their excellent lawyering. ...The point is worth
reiterating here. [Plaintiffs' counsel] was energetic, effective, and
creative throughout this long litigation. The Court found [Plaintiffs'
counsel]'s briefs and arguments first-rate. And the documents and
deposition transcripts which the Court reviewed in the course of
resolving motions revealed the firm's far-sighted and strategic approach
to discovery. ... Further, unlike in many class actions, plaintiffs' counsel

1 did not build their case by piggybacking on regulatory investigation or
2 settlement. ... The lawyers [] can genuinely claim to have been the
authors of their clients' success.

3 Sept. 22, 2015, Final Approval Order, *Hart v. RCI Hospitality Holdings, Inc.*, No. 09-
4 cv-3043.

5 From Magistrate Judge Laurel Beeler, United States District Court, N.D. Cal.:

6 Counsel have worked vigorously to identify and investigate the claims in
7 this case, and, as this litigation has revealed, understand the applicable
law and have represented their clients vigorously and effectively.

8 June 13, 2014, Order Granting Mtn. for Class Cert., *Ellsworth v. U.S. Bank, N.A.*, No.
9 12-cv-2506.

10 From Judge Deborah Chasanow, United States District Court, D. Md.:

11 [Plaintiffs' counsel] are qualified, experienced, and competent, as
12 evidenced by their background in litigating class-action cases involving
13 FCRA violations. ... As noted above, Plaintiffs' attorneys are
experienced and skilled consumer class action litigators who achieved a
favorable result for the Settlement Classes.

14 Oct. 2, 2013, Final Approval Order, *Singleton v. Domino's Pizza, LLC*, No. 11-cv1823.

15 From Judge Susan M. Robiner, Minnesota District Court, Henn. Cnty.:

16 Plaintiffs' counsel are adequate legal representatives for the class. They
17 have done work identifying and investigating potential claims, have
18 handled class actions in the past, know the applicable law, and have the
19 resources necessary to represent the class. The class will be fairly and
adequately represented.

20 Oct. 16, 2012, Order Granting Mtn. for Class Cert., *Spar v. Cedar Towing & Auction,*
21 *Inc.*, No. 27-CV-411-24993.

22 12. The attorneys at Terrell Marshall Law Group ("TMLG") are experienced class
23 action practitioners. The attorneys of TMLG have extensive experience in class actions,
24 collective actions, and other complex matters. They have been appointed lead or co-lead class
25 counsel in numerous cases at both the state and federal level. They have prosecuted a variety of
26 multi-million-dollar consumer fraud, civil rights, wage and hour, and product defect class

1 actions. The defendants in these cases have included companies such as Wal-Mart, Microsoft,
2 Best Buy, Toyota, Honda, Sallie Mae, Comcast, ABM Industries, Inc., AT&T, T-Mobile USA,
3 Weyerhaeuser, Behr Products, American Cemwood, Bank of America, Discover Financial
4 Services, Capital One, and HSBC. TMLG has served as class counsel in a number of FCRA
5 matters.

6 13. Class Counsel litigated this case on a contingency basis with a one-third
7 contingency fee, agreed to advance all costs, and have received no compensation to date for
8 their time or out-of-pocket costs.

9 14. Tasks performed by Class Counsel thus far include: (1) investigating the claims;
10 (2) researching and drafting the complaint; (3) opposing Defendant's motion to stay; (4)
11 opposing and arguing Defendant's motion for judgment on the pleadings; (5) opposing
12 Defendant's first motion for interlocutory appeal; (6) propounding discovery and reviewing
13 Defendant's responses; (7) numerous meet and confers regarding discovery responses; (8)
14 drafting and winning a motion to compel; (9) responding to Defendant's discovery requests;
15 (10) opposing Defendant's motion to transfer; (11) opposing and arguing Defendant's motion
16 for summary judgment; (12) opposing Defendant's second motion for interlocutory appeal;
17 (13) deposing BBSI's corporate representative; (14) attending an all-day mediation and preparing
18 a robust mediation statement; (15) engaging in subsequent settlement negotiations with Defendant;
19 (16) beginning to prepare a class certification motion in the event that Settlement did not occur;
20 (17) issuing subpoenas to the background check companies used by Defendant to get Class Member
21 contact information; (18) preparing the settlement documents for approval; and (19) overseeing
22 settlement administration and responding to class member inquiries.

23 15. Class Counsel have devoted over 836 hours to this matter, resulting in
24 \$329,208.70 in lodestar. Class Counsel's redacted time entries which show the timekeepers,
25 their hourly rates, and their time expended is attached hereto as **Exhibit C**. The entries have
26 been redacted to remove privileged information. The time entries include those that occurred

1 while I was at my former firm Nichols Kaster, PLLP.

2 16. Additional tasks Class Counsel expects to perform include continuing to oversee
3 the administration of the Settlement, researching and drafting final approval papers, preparing
4 for the final fairness hearing, traveling to and appearing at the final fairness hearing, and
5 continuing to respond to class member questions.

6 17. Class Counsel's lodestar does not reflect the full extent of Class Counsel's
7 efforts outside of this case that ultimately benefited the Class. For example, Class Counsel
8 have expended hundreds of hours researching standing issues and monitoring cases interpreting
9 *Spokeo, Inc. v. Robins*, 136 S. Ct. 1540 (2016) and other issues around the FCRA's disclosure
10 requirements.

11 18. My firm actively monitors all new FCRA filings and monitors developments on
12 a daily basis in FCRA cases that touch on relevant issues. These efforts enabled Class Counsel
13 to negotiate a substantial and meaningful settlement of this case, by comparing it to other
14 FCRA cases, and by distinguishing it from other cases that settled for less, including numerous
15 cases that involved unpublished opinions. This ongoing monitoring and research also allowed
16 Class Counsel to effectively assess the reasonability of the recovery in this matter and
17 motivated Class Counsel to negotiate a settlement. The out-of-pocket expenses for this research
18 and tracking are divided among my firm's active FCRA cases each month.

19 19. To date, class counsel have incurred \$28,752.51 in out-of-pocket litigation costs.
20 Itemized records are attached hereto as **Exhibit D**. The costs include those incurred while I was
21 at my former firm Nichols Kaster, PLLP.

22 20. Attached as **Exhibit E** is the Order Approving Award of Attorneys' Fees and
23 Costs in *Terrell v. Costco Wholesale Corp.*, No. 16-2-10140-1 SEA (King Cty. Sup. Ct. June
24 19, 2018).
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26

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3
4 EXECUTED this 30th day of August, 2019 at Minneapolis, Minnesota.

5 /s/ E. Michelle Drake

6 E. Michelle Drake
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Exhibit A



PHILADELPHIA | MINNEAPOLIS | WASHINGTON, D.C.

About Berger Montague

Berger Montague is a full-spectrum class action and complex civil litigation firm, with nationally known attorneys highly sought after for their legal skills. The firm has been recognized by courts throughout the country for its ability and experience in handling major complex litigation, particularly in the fields of antitrust, securities, mass torts, civil and human rights, whistleblower cases, employment, and consumer litigation. In numerous precedent-setting cases, the firm has played a principal or lead role.

The Legal Intelligencer honored the firm with its inaugural "Law Firm Innovator" award in 2018, an award which recognizes attorneys or whole firms on the cutting edge of the profession, and who think outside the box and have demonstrated an ability to distinguish their brands. *The National Law Journal*, which recognizes a select group of law firms each year that have done "exemplary, cutting-edge work on the plaintiffs side," has selected Berger & Montague in 12 out of the last 14 years (2003-05, 2007-13, 2015, 2016) for its "Hot List" of top plaintiffs' oriented litigation firms in the United States. The firm has also achieved the highest possible rating by its peers and opponents as reported in *Martindale-Hubbell*.

Currently, the firm consists of 60 lawyers; 18 paralegals; and an experienced support staff. Few firms in the United States have Berger Montague's breadth of practice and match the firm's successful track record in such a broad array of complex litigation.

History of the Firm

Berger Montague was founded in 1970 by the late David Berger to concentrate on the representation of plaintiffs in a series of antitrust class actions. David Berger helped pioneer the use of class actions in antitrust litigation and was instrumental in extending the use of the class action procedure to other litigation areas, including securities, employment discrimination, civil and human rights, and mass torts. The firm's complement of nationally recognized lawyers has represented both plaintiffs and defendants in these and other areas, and has recovered billions of dollars for its clients. In complex litigation, particularly in areas of class action litigation, Berger Montague has established new law and forged the path for recovery.

The firm has been involved in a series of notable cases, some of them among the most important in the last 40 years of civil litigation. For example, the firm was one of the principal counsel for plaintiffs in the *Drexel Burnham Lambert/Michael Milken* securities and bankruptcy litigation. Claimants in these cases recovered approximately \$2 billion in the aftermath of the collapse of the junk bond market and the bankruptcy of *Drexel* in the late 1980s. The firm was also among the principal trial counsel in the *Exxon Valdez Oil Spill* litigation in Anchorage, Alaska, a trial resulting in a record jury award of \$5 billion against Exxon, later reduced by the

U.S. Supreme Court to \$507.5 million. Berger Montague was lead counsel in the *School Asbestos Litigation*, in which a national class of secondary and elementary schools recovered in excess of \$300 million to defray the costs of asbestos abatement. The case was the first mass tort property damage class action certified on a national basis. Berger Montague was also lead/liaison counsel in the *Three Mile Island Litigation* arising out of a serious nuclear incident.

Additionally, in the human rights area, the firm, through its membership on the executive committee in the *Holocaust Victim Assets Litigation*, helped to achieve a \$1.25 billion settlement with the largest Swiss banks on behalf of victims of Nazi aggression whose deposits were not returned after the Second World War. The firm also played an instrumental role in bringing about a \$4.37 billion settlement with German industry and government for the use of slave and forced labor during the Holocaust.

Practice Areas and Notable Cases

Antitrust

In antitrust litigation, the firm has served as lead, co-lead or co-trial counsel on many of the most significant civil antitrust cases over the last 40 years, including *In re Corrugated Container Antitrust Litigation* (recovery in excess of \$366 million), the *Infant Formula* case (recovery of \$125 million), the *Brand Name Prescription Drug* price fixing case (settlement of more than \$700 million), the *State of Connecticut Tobacco Litigation* (settlement of \$3.6 billion), the *Graphite Electrodes Antitrust Litigation* (settlement of more than \$134 million), and the *High-Fructose Corn Syrup Litigation* (\$531 million). Most recently, the firm is one of three co-lead counsel *In re Payment Cards Antitrust Litigation*, which has resulted in the highest private class action settlement in U.S. history of \$7.2B (reduced to \$5.7 billion after opt outs). The firm has also played a leading role in cases in the pharmaceutical arena, especially in cases involving the delayed entry of generic or other rival drug competition, having achieved over \$1 billion in settlements in such cases over the past decade.

The *Legal 500*, a guide to worldwide legal services providers, ranked Berger Montague as a Top-Tier Firm for Antitrust: Civil Litigation and Class Actions in the United States in its 2015 guide and has repeatedly cited Berger Montague's antitrust practice as "stand[ing] out by virtue of its first-class trial skills."

For five straight years, Berger Montague has been selected by *Chambers and Partners' USA's* America's Leading Lawyers for Business as one of Pennsylvania's top antitrust firms.

In re Currency Conversion Fee Antitrust Litigation: Berger Montague, as one of two co-lead counsel, spearheaded a class action lawsuit alleging that the major credit cards had conspired to fix prices for foreign currency conversion fees imposed on credit card transactions. After eight years of litigation, a settlement of \$336 million was approved in October 2009, with a Final Judgment entered in November 2009. Following the resolution of eleven appeals, the District Court, on October 5, 2011, directed distribution of the settlement funds to more than 10 million timely filed claimants, among the largest class of claimants in an antitrust consumer class action. (MDL No. 1409 (S.D.N.Y)).

In re March banks Truck Service Inc., et al. v. Comdata Network, Inc.: Berger Montague was co-lead counsel in this antitrust class action brought on behalf of a class of thousands of Independent Truck Stops. The lawsuit alleged that defendant Comdata Network, Inc. had monopolized the market for specialized Fleet Cards used by long haul truckers. Comdata imposed anticompetitive provisions in its agreements with Independent Truck Stops that artificially inflated the fees Independents paid when accepting the Comdata's Fleet Card for payment. These contractual provisions, commonly referred to as anti-steering provisions or merchant restraints, barred Independents from taking various competitive steps that could have been used to steer fleets to rival payment cards. The settlement for \$130 million and valuable prospective relief was preliminary approved on March 17, 2014, and finally approved on July 14, 2014. In its July 14, 2014 order approving Class Counsel's fee request, entered contemporaneously with its order finally approving the settlement, the Court described this outcome as "substantial, both in absolute terms, and when assessed in light of the risks of establishing liability and damages in this case."

Ross, et al. v. Bank of America (USA) N.A., et al.: Berger Montague, as lead counsel for the cardholder classes, obtained final approval of settlements reached with Chase, Bank of America, Capital One and HSBC, on claims that the defendant banks unlawfully acted in concert to require cardholders to arbitrate disputes, including debt collections, and to preclude cardholders from participating in any class actions. The case was brought for injunctive relief only. The settlements remove arbitration clauses nationwide for 3.5 years from the so-called "cardholder agreements" for over 100 million credit card holders. This victory for consumers and small businesses came after nearly five years of hard-fought litigation, including obtaining a decision by the Court of Appeals reversing the order dismissing the case, and will aid consumers and small businesses in their ability to resist unfair and abusive credit card practices. A proposed settlement has been reached with the non-bank defendant arbitration provider (NAF), and, after defeating summary judgment, Berger Montague is preparing the case for trial against the remaining two bank defendants.

In re High Fructose Corn Syrup Antitrust Litigation: Berger Montague was one of three co-lead counsel in this nationwide class action alleging a conspiracy to allocate volumes and customers and to price-fix among five producers of high fructose corn syrup. After nine years of litigation, including four appeals, the case was settled on the eve of trial for \$531 million. (MDL No. 1087, Master File No. 95- 1477 (C.D. Ill.)).

In re Linerboard Antitrust Litigation: Berger Montague was one of a small group of court-appointed executive committee members who led this nationwide class action against producers of linerboard. The complaint alleged that the defendants conspired to reduce production of linerboard in order to increase the price of linerboard and corrugated boxes made therefrom. At the close of discovery, the case was settled for more than \$200 million. (98 Civ. 5055 and 99-1341 (E.D. Pa.)).

Johnson, et al. v AzHHA, et al.: Berger Montague is co-lead counsel in this litigation on behalf of a class of temporary nursing personnel, against the Arizona Hospital and Healthcare Association, and its member hospitals, for agreeing and conspiring to fix the rates and wages for temporary nursing personnel, causing class members to be underpaid. The court approved a nearly \$22.5 million settlement on behalf of this class of nurses. (Case No. 07-1292 (D. Ariz.)).

In re Graphite Electrodes Antitrust Litigation: Berger Montague was one of the four co-lead counsel in a nationwide class action price-fixing case. The case settled for in excess of \$134 million and over 100% of claimed damages. (02 Civ. 99-482 (E.D. Pa.)).

North Shore Hematology-Oncology Assoc., Inc. v. Bristol-Myers Squibb Co.: The firm was one of several prosecuting an action complaining of Bristol Myers's use of invalid patents to block competitors from marketing more affordable generic versions of its life-saving cancer drug, Platinol (cisplatin). The case settled for \$50 million. (No. 1:04CV248 (EGS)(D.D.C.)).

In re Catfish Antitrust Litig. Action: The firm was co-trial counsel in this action which settled with the last defendant a week before trial, for total settlements approximating \$27 million. (No. 2:92CV073-D-O, MDL No. 928 (N.D. Miss.)).

In re Carbon Dioxide Antitrust Litigation: The firm was co-trial counsel in this antitrust class action which settled with the last defendant days prior to trial, for total settlements approximating \$53 million, plus injunctive relief. (MDL No. 940 (M.D. Fla.)).

In re Infant Formula Antitrust Litigation: The firm served as co-lead counsel in an antitrust class action where settlement was achieved two days prior to trial, bringing the total settlement proceeds to \$125 million. (MDL No. 878 (N.D. Fla.)).

Red Eagle Resources Corp., Inc., v. Baker Hughes, Inc.: The firm was a member of the plaintiffs' executive committee in this antitrust class action which yielded a settlement of \$52.5 million. (C.A. No. H- 91-627 (S.D. Tex.)).

In re Corrugated Container Antitrust Litigation: The firm, led by H. Laddie Montague, was co-trial counsel in an antitrust class action which yielded a settlement of \$366 million, plus interest, following trial. (MDL No. 310 (S.D. Tex.)).

Bogosian v. Gulf Oil Corp.: With Berger Montague as sole lead counsel, this landmark action on behalf of a national class of more than 100,000 gasoline dealers against 13 major oil companies led to settlements of over \$35 million plus equitable relief on the eve of trial. (No. 71-1137 (E.D. Pa.)).

In re Master Key Antitrust Litigation: The firm served as co-lead counsel in an antitrust class action that yielded a settlement of \$21 million during trial. (MDL No. 45 (D. Conn.)).

The firm has also played a leading role in cases in the pharmaceutical arena, especially in cases involving the delayed entry of generic competition, having achieved over \$1 billion in settlements in such cases over the past decade, including:

In re Prandin Direct Purchaser Antitrust Litigation: Berger Montague served as co-lead counsel and recovered \$19 million on behalf of direct purchasers of the diabetes medication Prandin. (Case No. 2:10- cv-12141 (E.D. Mich.)).

Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.: Berger Montague was appointed as co-lead counsel in a case challenging Warner Chilcott's alleged anticompetitive practices with respect to the branded drug Doryx. The case was settled for \$15 million. (Case No. 2:12-cv-03824 (E.D. Pa.)).

In re Neurontin Antitrust Litigation: Berger Montague served as part of a small group of firms challenging the maintenance of a monopoly relating to the pain medication Neurontin. The case settled for \$190 million. (Case No. 02-1830 (D.N.J.)).

In re Skelaxin Antitrust Litigation: Berger Montague was among a small group of firms litigating on behalf of direct purchasers of the drug Skelaxin. The case settled for \$73 million. (Case No. 2:12-cv-83 / 1:12-md-02343) (E.D. Tenn.)).

In re Wellbutrin XL Antitrust Litigation: Berger Montague is serving as co-lead counsel for a class of direct purchasers of the antidepressant Wellbutrin XL. A settlement of \$37.5 million was reached with Valeant Pharmaceuticals (formerly Biovail), one of two defendants in the case. Litigation is proceeding against the remaining defendant, GlaxoSmithKline. (Case No. 08-cv-2431 (E.D. Pa.)).

Rochester Drug Co-Operative, Inc. v. Braintree Labs., Inc.: Berger Montague, appointed as co-lead counsel, prosecuted this case on behalf of direct purchasers alleging sham litigation led to the delay of generic forms of the brand drug Miralax. The case settled for \$17.25 million. (Case No. 07-142 (D. Del.)).

In re Oxycontin Antitrust Litigation: Berger Montague served as co-lead counsel on behalf of direct purchasers of the prescription drug Oxycontin. The case settled in 2011 for \$16 million. (Case No. 1:04- md-01603 (S.D.N.Y.)).

Meijer, Inc., et al. v. Abbott Laboratories: Berger Montague served as co-lead counsel in a class action on behalf of pharmaceutical wholesalers and pharmacies charging Abbott Laboratories with illegally maintaining monopoly power and overcharging purchasers in violation of the federal antitrust laws. Plaintiffs alleged that Abbott had used its monopoly with respect to its anti-HIV medicine Norvir (ritonavir) to protect its monopoly power for another highly profitable Abbott HIV drug, Kaletra. This antitrust class action settled for \$52 million after four days of a jury trial in federal court in Oakland, California. (Case No. 07-5985 (N.D. Cal.)).

In re Nifedipine Antitrust Litigation: Berger Montague played a major role (serving on the executive committee) in this antitrust class action on behalf of direct purchasers of generic versions of the anti-hypertension drug Adalat (nifedipine). After eight years of hard-fought litigation, the court approved a total of \$35 million in settlements. (Case No. 1:03-223 (D.D.C.)).

In re DDAVP Direct Purchaser Antitrust Litigation: Berger Montague served as co-lead counsel in a case that charged defendants with using sham litigation and a fraudulently obtained patent to delay the entry of generic versions of the prescription drug DDAVP. Berger Montague achieved a \$20.25 million settlement only after winning a precedent-setting victory before the United States Court of Appeals for the Second Circuit that ruled that direct purchasers had standing to recover overcharges arising from a patent-holder's misuse of an allegedly fraudulently obtained patent. (Case No. 05-2237 (S.D.N.Y.)).

In re Terazosin Antitrust Litigation: Berger Montague was one of a small group of counsel in a case alleging that Abbott Laboratories was paying its competitors to refrain from introducing less expensive generic versions of Hytrin. The case settled for \$74.5 million. (Case No. 99-MDL-1317 (S.D. Fla.)).

In re Remeron Antitrust Litigation: Berger Montague was one of a small group of counsel in a case alleging that the manufacturer of this drug was paying its competitors to refrain from introducing less expensive generic versions of Remeron. The case settled for \$75 million. (2:02-CV-02007-FSH(D. N.J.)).

In re Tricor Antitrust Litigation: Berger Montague was one of a small group of counsel in a case alleging that the manufacturer of this drug was paying its competitors to refrain from introducing less expensive generic versions of Tricor. The case settled for \$250 million. (No. 05-340 (D. Del.)).

In re Relafen Antitrust Litigation: Berger Montague was one of a small group of firms who prepared for the trial of this nationwide class action against GlaxoSmithKline, which was alleged to have used fraudulently-procured patents to block competitors from marketing less-expensive generic versions of its popular nonsteroidal anti-inflammatory drug, Relafen (nabumetone). Just before trial, the case was settled for \$175 million. (No. 01-12239-WGY (D. Mass.)).

In re Cardizem CD Antitrust Litigation: Berger Montague served on the executive committee of firms appointed to represent the class of direct purchasers of Cardizem CD. The suit charged that Aventis (the brand-name drug manufacturer of Cardizem CD) entered into an illegal agreement to pay Andrx (the maker of a generic substitute to Cardizem CD) millions of dollars to delay the entry of the less expensive generic product. On November 26, 2002, the district court approved a final settlement against both defendants for \$110 million. (No. 99-MD-1278, MDL No. 1278 (E.D. Mich.)).

In re Buspirone Antitrust Litigation: The firm served on the court-appointed steering committee in this class action, representing a class of primarily pharmaceutical wholesalers and resellers. The Buspirone class action alleged that pharmaceutical manufacturer BMS engaged in a pattern of illegal conduct surrounding its popular anti-anxiety medication, Buspar, by paying a competitor to refrain from marketing a generic version of Buspar, improperly listing a patent with the FDA, and wrongfully prosecuting patent infringement actions against generic competitors to Buspar. On April 11, 2003, the Court approved a \$220 million settlement. (MDL No. 1410 (S.D.N.Y.)).

North Shore Hematology-Oncology Assoc., Inc. v. Bristol-Myers Squibb Co.: The firm was one of several prosecuting an action complaining of Bristol Myers's use of invalid patents to block competitors from marketing more affordable generic versions of its life-saving cancer drug, Platinol (cisplatin). The case settled for \$50 million. (No. 1:04CV248 (EGS)(D.D.C.)).

Commercial Litigation

Berger Montague helps business clients achieve extraordinary successes in a wide variety of complex commercial litigation matters. The firm's attorneys appear regularly on behalf of clients in high stakes federal and state court commercial litigation across the United States. The firm works with its clients to develop a comprehensive and detailed litigation plan, and then organize, allocate and deploy whatever resources are necessary to successfully prosecute or defend the case.

Erie Power Technologies, Inc. v. Aalborg Industries A/S, et al.: Berger Montague represented a trustee in bankruptcy against officers and directors and the former corporate parent and obtained a very favorable confidential settlement. (No. 04-282E (W.D. Pa.)).

Moglia v. Harris et al.: Berger Montague represented a liquidating trustee against the officers of U.S. Aggregates, Inc. and obtained a settlement of \$4 million. (No. C 04 2663 (CW) (N.D. Cal.)).

Gray v. Gessow et al.: The firm represented a litigation trust and brought two actions, one against the officers and directors of Sunterra Inc. an insolvent company, and the second against Sunterra's accountants, Arthur Andersen and obtained an aggregate settlement of \$4.5 million. (Case No. MJG 02-CV-1853 (D. Md.) and No. 6:02-CV-633-ORL-28JGG (M.D. Fla.)).

Fitz, Inc. v. Ralph Wilson Plastics Co.: The firm served as sole lead counsel and obtained, after 7 years of litigation, in 2000 a settlement whereby fabricator class members could obtain full recoveries for their losses resulting from defendants' defective contact adhesives. (No. 1-94-CV-06017 (D.N.J.)).

Provident American Corp. and Provident Indemnity Life Insurance Company v. The Loewen Group Inc. and Loewen Group International Inc.: Berger Montague settled this individual claim, alleging a 10-year oral contract (despite six subsequent writings attempting to reduce terms to writing, each with materially different terms added, all of which were not signed), for a combined payment in cash and stock of the defendant, of \$30 Million. (No. 92-1964 (E.D. Pa.)).

Marilou Whitney (Estate of Cornelius Vanderbilt Whitney) v. Turner/Time Warner. Berger Montague settled this individual claim for a confidential amount, seeking interpretation of the distribution agreement for the movie, *Gone with the Wind*, and undistributed profits for the years 1993-1997, with forward changes in accounting and distribution.

American Hotel Holdings Co., et. al v. Ocean Hospitalities, Inc., et. al.: Berger Montague defended against a claim for approximately \$16 million and imposition of a constructive trust, arising out of the purchase of the Latham Hotel in Philadelphia. Berger & Montague settled the case for less than the cost of the trial that was avoided. (June Term, 1997, No. 2144 (Pa. Ct. Com. Pl., Phila. Cty.))

Creative Dimensions and Management, Inc. v. Thomas Group, Inc.: Berger Montague defended this case against a claim for \$30 million for breach of contract. The jury rendered a verdict in favor of Berger Montague's client on the claim (i.e., \$0), and a verdict for the full amount of Berger Montague's client on the counterclaim against the plaintiff. (No. 96-6318 (E.D. Pa.)).

Robert S. Spencer, et al. v. The Arden Group, Inc., et al.: Berger Montague represented an owner of limited partnership interests in several commercial real estate partnerships in a lawsuit against the partnerships' general partner. The terms of the settlement are subject to a confidentiality agreement. (Aug. Term, 2007, No. 02066 (Pa. Ct. Com. Pl., Phila. Cty. - Commerce Program)).

Forbes v. GMH: Berger Montague represented a private real estate developer/investor who sold a valuable apartment complex to GMH for cash and publicly-held securities. The case which claimed securities fraud in connection with the transaction settled for a confidential sum which represented a significant portion of the losses experienced. (No. 07-cv-00979 (E.D. Pa.)).

Commodities & Financial Instruments

Berger Montague ranks among the country's preeminent firms for managing and trying complex commodities and options related cases on behalf of individuals and as class actions. The firm's commodities clients include individual hedge and speculation traders, hedge funds, energy firms, investment funds, and precious metals clients.

In re MF Global Holdings Ltd. Investment Litigation: Berger Montague is one of two co-lead counsel representing thousands of commodities account holders who fell victim to the alleged massive theft and misappropriation of client funds at the major global commodities brokerage firm MF Global. Over the last year, substantial settlements have been reached with JPMorgan Chase Bank, the MF Global SIPA Trustee, and the CME Group. These settlements will ultimately enable MF Global customers to recover over one billion dollars. Berger Montague is continuing to pursue claims against former directors and officers of MF Global, including Jon Corzine, and against MF Global's former auditor, PricewaterhouseCoopers. (No. 11-cv-07866 (S.D.N.Y.)).

In re Commodity Exchange, Inc., Gold Futures and Options Trading Litigation: Berger Montague is one of two co-lead counsel representing traders of gold-based derivative contracts, physical gold, and gold-based securities against The Bank of Nova Scotia, Barclays Bank plc, Deutsche Bank AG, HSBC Bank plc, Société Générale and the London Gold Market Fixing Limited. Plaintiffs allege that the defendants, members of the London Gold Market Fixing Limited, which sets an important benchmark price for gold, conspired to manipulate this benchmark for their collective benefit. (1:14-md-02548 (S.D.N.Y.)).

In re Libor-Based Financial Instruments Antitrust Litigation: Berger Montague represents investors who transacted in Eurodollar futures contracts and options on futures contracts on the Chicago Mercantile Exchange ("CME") between August 2007 and May 2010. The lawsuit alleges that the defendant banks knowingly and intentionally understated their true borrowing costs. By doing so, the defendant banks caused Libor to be calculated or suppressed at artificially low rates. The defendants' alleged manipulation of Libor allowed their banks to pay artificially low interest rates to purchasers of Libor-based financial instruments. (No. 1:11-md-02262-NRB (S.D.N.Y.)).

In re North Sea Brent Crude Oil Futures Litigation: Berger Montague filed a proposed class action on behalf of traders of Brent Crude Oil futures contracts against Royal Dutch Shell plc, BP plc, Statoil ASA, Morgan Stanley, Trafigura Beheer B.V., Trafigura AG, Phibro Trading LLC, and Vitol, S.A. (collectively, "Defendants") during the period of at least 2002 through the present. The complaint alleges that the Defendants violated the antitrust laws and the Commodity Exchange Act by using Platts reporting service's methodology for reporting prices to control the Brent Crude Oil physical market and thereby to manipulate Brent Crude Oil prices and the prices of Brent Crude oil futures contracts traded on the New York Mercantile Exchange ("NYMEX") and the Intercontinental Exchange ("ICE"). (No. 13-cv-8240 (S.D.N.Y.)).

Brown, et al. v. Kinross Gold, U.S.A., et al.: Berger Montague was one of two co-lead counsel in this action alleging that a leading gold mining company illegally forced out preferred shareholders. The action resulted in a settlement of \$29.25 million in cash and \$6.5 million in other consideration (approximately 100% of damages and accrued dividends after fees and costs). (No. 02-cv-00605 (D.N.V.)).

Consumer Protection

Berger Montague protects consumers when they are injured by false or misleading advertising, defective products, data privacy breaches, and various other unfair trade practices. Consumers too often suffer the brunt of corporate wrongdoing, particularly in the area of false or misleading advertising, defective products, and data or privacy breaches.

Countrywide Predatory Lending Enforcement Action: Berger Montague advised the Ohio Attorney General (and several other state attorneys general) regarding predatory lending in a landmark law enforcement proceeding against *Countrywide* (and its parent, Bank of America) culminating in 2008 in mortgage-related modifications and other relief for borrowers across the country valued at some \$8.6 billion.

In re Pet Foods Product Liability Litigation: The firm served as one of plaintiffs' co-lead counsel in this multidistrict class action suit seeking to redress the harm resulting from the manufacture and sale of contaminated dog and cat food. The case settled for \$24 million. Many terms of the settlement are unique and highly beneficial to the class, including allowing class members to recover up to 100% of their economic damages without any limitation on the types of economic damages they may recover. (1:07-cv- 02867 (D.N.J.), MDL Docket No. 1850 (D.N.J.)).

In re TJX Companies Retail Security Breach Litigation: The firm served as co-lead counsel in this multidistrict litigation brought on behalf of individuals whose personal and financial data was compromised in the then-largest theft of personal data in history. The breach involved more than 45 million credit and debit card numbers and 450,000 customers' driver's license numbers. The case was settled for benefits valued at over \$200 million. Class members whose driver's license numbers were at risk were entitled to 3 years of credit monitoring and identity theft insurance (a value of \$390 per person based on the retail cost for this service), reimbursement of actual identity theft losses, and reimbursement of driver's license replacement costs. Class members whose credit and debit card numbers were at risk were entitled to cash of \$15-\$30 or store vouchers of \$30-\$60. (No. 1:07-cv-10162-WGY, (D. Mass.)).

In Re: Heartland Payment Systems, Inc. Customer Data Security Breach Litigation: The firm served on the Executive Committee of this multidistrict litigation and obtained a settlement of cash and injunctive relief for a class of 130 million credit card holders whose credit card information was stolen by computer hackers. The breach was the largest known theft of credit card information in history. The settlement is subject to court approval. (No. 4:09-MD-2046 (S.D. Tex. 2009)).

In re: Countrywide Financial Corp. Customer Data Security Breach Litigation: The firm served on the Executive Committee of this multidistrict litigation and obtained a settlement for a class of 17 million individuals whose personal information was at risk when a rogue employee sold their information to unauthorized third parties. Settlement benefits included: (i) reimbursement of several categories of out-of-pocket costs; (ii) credit monitoring and identity theft insurance for 2 years for consumers who did not accept Countrywide's prior offer of credit monitoring; and (iii) injunctive relief. The settlement was approved by the court in 2010. (3:08-md-01998-TBR (W.D. Ky. 2008)).

In re Educational Testing Service Praxis Principles of Learning and Teaching: Grades 7-12 Litigation: The firm served on the plaintiffs' steering committee and obtained an \$11.1 million settlement in 2006 on behalf of persons who were incorrectly scored on a teacher's licensing exam. (MDL No. 1643 (E.D. La.)).

Vadino, et al. v. American Home Products Corporation, et al.: The firm filed a class complaint different from that filed by any other of the filing firms in the New Jersey State Court "Fen Phen" class action, and the class sought in the firm's complaint was ultimately certified. It was the only case anywhere in the country to include a claim for medical monitoring. In the midst of trial, the New Jersey case was folded into a national settlement which occurred as the trial was ongoing, and which was structured to include a medical monitoring component worth in excess of \$1 billion. (Case Code No. 240 (N.J. Super. Ct.)).

Parker v. American Isuzu Motors, Inc.: The firm served as sole lead counsel and obtained a settlement whereby class members recovered up to \$500 each for economic damages resulting from accidents caused by faulty brakes. (Sept. Term 2003, No. 3476 (Pa. Ct. Com. Pl., Phila. Cty.)).

Salvucci v. Volkswagen of America, Inc. d/b/a Audi of America, Inc.: The firm served as co-lead counsel in litigation brought on behalf of a nationwide class alleging that defendants failed to disclose that its vehicles contained defectively designed timing belt tensioners and associated parts and that defendants misrepresented the appropriate service interval for replacement of the timing belt tensioner system. After extensive discovery, a settlement was reached. (Docket No. ATL-1461-03 (N.J. Sup. Ct. 2007)).

Burgo v. Volkswagen of America, Inc. d/b/a Audi of America, Inc.: The firm served as co-lead counsel in litigation brought on behalf of a nationwide class against defendants' defective tires that were prone to bubbles and bulges. Counsel completed extensive discovery and class certification briefing. A settlement was reached while the decision on class certification was pending. The settlement consisted of remedies including total or partial reimbursement for snow tires, free inspection/replacement of tires for those who experienced sidewall bubbles, blisters, or bulges, and remedies for those class members who incurred other costs related to the tires' defects. (Docket No. HUD-L-2392-01 (N.J. Sup. Ct. 2001)).

Crawford v. Philadelphia Hotel Operating Co.: The firm served as co-lead counsel and obtained a settlement whereby persons who contracted food poisoning at a business convention recovered \$1,500 each. (March Term, 2004, No. 000070 (Pa. Ct. Com. Pl., Phila. Cty.)).

Block v. McDonald's Corporation: The firm served as co-lead counsel and obtained a settlement of \$12.5 million with McDonald's stemming from its failure to disclose the use of beef fat in its french fries. (No. 01-CH-9137 (Ill. Cir. Ct., Cook Cty.)).

Credit Reporting & Background Checks

Berger Montague's Credit Reporting and Background Checks Practice Group litigates on behalf of consumers nationwide to protect them against violations of their rights under the Fair Credit Reporting Act and other consumer protection laws that protect consumers from inaccurate, unfair, or discriminatory credit reports or background checks.

The Fair Credit Reporting Act is a federal law that governs credit reports, background checks, and many other reports containing information about individuals. Potential and current employers and creditors are relying more and more on background checks and credit reports when making hiring and firing decisions, and the consumer reporting agencies that prepare the reports are often more concerned with profits than with accuracy. The firm is committed to ensuring that credit report and background check information is accurate and that it only be sold and used for legal purposes.

Berger Montague is dedicated to protecting consumers and ensuring that consumers receive justice when their rights have been violated by employers, consumer reporting agencies, and debt collectors. The attorneys in the Credit Reporting and Background Checks Practice Group team are dedicated to protecting consumers' rights and privacy. They are highly experienced in effectively litigating these claims and have successfully represented hundreds of thousands of consumers across the country and achieved relief worth millions of dollars on behalf of their clients.

Rubio-Delgado v. Aerotek, Inc., No. 16-cv-1066 (S.D. Ohio). FCRA class action, alleging violations by employer regarding the disclosure & authorization provided to applicants and current employees, as well as the provision of notice to applicants and employees if an adverse action was based on a background check, resulting in a \$15 million settlement.

Hillson v. Kelly Services, Inc., No. 15-cv-10803 (E.D. Mich.). FCRA class action, alleging similar violations by employer as those in *Aerotek*, resulting in a \$6.749 million settlement.

Ernst v. DISH Network, LLC & Sterling Infosystems, Inc., No. 12-cv-8794 (S.D.N.Y.). FCRA class action, alleging violations by employer regarding the disclosure & authorization provided to contractors, resulting in a \$1.75 million settlement with employer.

Nesbitt v. Postmates, Inc., No. CGC-15-547146 (Cal. Super. Ct., San Fran. Cnty.). FCRA class action, alleging violations by employer regarding the disclosure & authorization provided to applicants and current employees, as well as the provision of notice to applicants and employees if an adverse action was based on a background check, resulting in a \$2.5 million settlement.

Halvorson v. TalentBin, Inc., No. 15-cv-5166 (N.D. Cal.). FCRA class action, alleging violations by online data aggregator regarding its obligations to notify users of its profiles about FCRA regulations, and to obtain certifications from those users regarding compliance with the FCRA, resulting in a \$1.15 million settlement.

Legrand v. IntelliCorp Records, Inc., No. 15-cv-2091 (N.D. Ohio). FCRA class action, alleging violations by consumer reporting agency regarding accuracy of its reports, resulting in a \$1.1 million settlement.

Defective Drugs & Medical Devices

Berger Montague's Defective Drugs and Medical Devices Group is committed to helping individuals injured by defective drugs and medical devices. Every year, millions of Americans take a prescription drug or undergo a major surgery that includes a medical device implant. In some instances, the drug or device has an adverse effect or does not work as intended.

Defective Products

Berger Montague's Defective Products Group represents homeowners, vehicle owners and other consumers nationwide who have been harmed by failing products. Whether the problem is with a construction product, an appliance or an automobile, the firm will vigorously fight to protect consumers' rights under the law and to make them whole.

Manufacturers seem to have an unfair advantage when evaluating — and often rejecting or dismissing — warranty claims and other complaints made by consumers concerning faulty products. Berger Montague, however, has the ability to level the playing field through the legal system.

When a product is defective, a consumer may feel like he or she is the only one affected. But, there is a good chance that hundreds, thousands or even hundreds of thousands of other consumers have experienced the same problem. Through class action litigation, Berger Montague is able to work to right these wrongs by representing all similar claims in a single lawsuit.

Corporate Governance & Shareholder Rights

Berger Montague protects the interests of individual and institutional investors in shareholder derivative actions in state and federal courts across the United States. The firm's attorneys help individual and institutional investors reform poor corporate governance, as well as represent them in litigation against directors of a company for violating their fiduciary duty or provide guidance on shareholder rights.

Emil Rossdeutscher and Dennis Kelly v. Viacom: The firm, as lead counsel, obtained a settlement resulting in a fund of \$14.25 million for the class. (C.A. No. 98C-03-091 (JEB) (Del. Super. Ct.)).

Fox v. Riverview Realty Partners, f/k/a Prime Group Realty Trust, et al.: The firm, as lead counsel, obtained a settlement resulting in a fund of \$8.25 million for the class.

Employee Benefits & ERISA

Berger Montague represents employees who have claims under the federal Employee Retirement Income Security Act. The firm litigates cases on behalf of employees whose 401(k) and pension investments have suffered severe losses as a result of the breach of fiduciary duties by plan administrators and the companies they represent. Berger Montague has recovered hundreds of millions of dollars in lost retirement benefits for American workers, and also favorably structured their retirement plans.

In re Unisys Corp. Retiree Medical Benefits: The firm, as co-lead counsel, handled the presentation of over 70 witnesses, 30 depositions, and over 700 trial exhibits in this action that has resulted in partial settlements in 1990 of over \$110 million for retirees whose health benefits were terminated. (MDL No. 969 (E.D. Pa.)).

Local 56 U.F.C.W. v. Campbell Soup Co.: The firm represented a class of retired Campbell Soup employees in an ERISA class action to preserve and restore retiree medical benefits. A settlement yielded benefits to the class valued at \$114.5 million. (No. 93-MC-276 (SSB)(D.N.J.)).

Employment & Unpaid Wages

Berger Montague works tirelessly to safeguard the rights of employees, and the Employment & Unpaid Wages Practice Group devotes all of its energies to helping the firm's clients achieve their goals. The attorneys' understanding of federal and state wage and hour laws, federal and state civil rights and discrimination laws, ERISA, the WARN Act, laws protecting whistleblowers, such as federal and state False Claims Acts, and other employment laws, allows them to develop creative strategies to vindicate their clients' rights and help them secure the compensation to which they are entitled.

Jantz v. Social Security Administration: The firm served as co-lead counsel and obtained a settlement on behalf of employees with targeted disabilities ("TDEs") alleged that SSA discriminated against TDEs by denying them promotional and other career advancement opportunities. The settlement was reached after more than ten years of litigation, and the Class withstood challenges to class certification on four separate occasions. The settlement includes a monetary fund of \$9.98 million and an unprecedented package of extensive programmatic changes valued at approximately \$20 million. EEOC No. 531-2006-00276X (2015).

Ciamillo v. Baker Hughes, Incorporated: The firm served as lead counsel and obtained a settlement of \$5 million on behalf of a class of oil and gas workers who did not receive any overtime compensation for working hours in excess of 40 per week. (Civil Action No. 14-cv-81 (D. Alaska)).

Employees Committed for Justice v. Eastman Kodak Company: The firm served as co-lead counsel and obtained a settlement of \$21.4 million on behalf of a nationwide class of African American employees of Kodak alleging a pattern and practice of racial discrimination. A significant opinion issued in the case is *Employees Committed For Justice v. Eastman Kodak Co.*, 407 F. Supp. 2d 423 (W.D.N.Y. 2005) (denying Kodak's motion to dismiss). No. 6:04-cv-06098 (W.D.N.Y.).

Salcido v. Cargill Meat Solutions Corp.: The firm served as co-lead counsel and obtained a settlement of \$7.5 million on behalf of a class of thousands of employees of Cargill Meat Solutions Corp. alleging that they were forced to work off-the-clock and during their breaks. This is one of the largest settlements of this type of case involving a single plant in U.S. history. (Civil Action Nos. 1:07-cv-01347-LJO-GSA and 1:08-cv-00605-LJO-GSA (E.D. Cal.)).

Miller v. Hygrade Food Products, Inc.: The firm served as lead counsel and obtained a settlement of \$3.5 million on behalf of a group of African American employees of Sara Lee Foods Corp. to resolve charges of racial discrimination and retaliation at its Ball Park Franks plant. (No. 99-1087 (E.D. Pa.)).

Chabrier v. Wilmington Finance, Inc.: The firm served as co-lead counsel and obtained a settlement of \$2,925,000 on behalf of loan officers who worked in four offices to resolve claims for unpaid overtime wages. A significant opinion issued in the case is *Chabrier v. Wilmington Finance, Inc.*, 2008 WL 938872 (E.D. Pa. April 04, 2008) (denying the defendant's motion to decertify the class). (No. 06-4176 (E.D. Pa.)).

Bonnette v. Rochester Gas & Electric Co.: The firm served as co-lead counsel and obtained a settlement of \$2 million on behalf of a class of African American employees of Rochester Gas & Electric Co. to resolve charges of racial discrimination in hiring, job assignments, compensation, promotions, discipline, terminations, retaliation, and a hostile work environment. (No. 07-6635 (W.D.N.Y.)).

Environment & Public Health

Berger Montague lawyers are trailblazers in the fields of environmental class action litigation and mass torts. The firm's attorneys have earned their reputation in the fields of environmental litigation and mass torts by successfully prosecuting some of the largest, most well-known cases of our time. The Environment & Public Health Practice Group also prosecutes significant claims for personal injury, commercial losses, property damage, and environmental response costs.

Cook v. Rockwell International Corporation: In February 2006, the firm won a \$554 million jury verdict on behalf of thousands of property owners whose homes were exposed to plutonium or other toxins. Judgment in the case was entered by the court in June 2008 which, with interest, totaled \$926 million (with proceedings now continuing on appeal). Recognizing this tremendous achievement, the Public Justice Foundation bestowed its prestigious Trial Lawyer of the Year Award for 2009 on Mr. Davidoff, Mr. Sorensen and the entire trial team for their "long and hard-fought" victory against "formidable corporate and government defendants." (No. 90-cv-00181-JLK (D. Colo.)). The jury verdict in that case was vacated on appeal in 2010, but on a second trip to the Tenth Circuit, Plaintiffs secured a victory in 2015, with the case then being sent back to the district court, where it remains pending.

In re Exxon Valdez Oil Spill Litigation: On September 16, 1994, a jury trial of several months duration resulted in a record punitive damages award of \$5 billion against the Exxon defendants as a consequence of one of the largest oil spills in U.S. history. The award was reduced to \$507.5 million pursuant to a Supreme Court decision. David Berger was co-chair of the plaintiffs' discovery committee (appointed by both the federal and state courts). Harold Berger served as a member of the organizing case management committee. H. Laddie Montague was specifically appointed by the federal court as one of the four designated trial counsel. Both Mr. Montague and Peter Kahana shared (with the entire trial team) the 1995 "Trial Lawyer of the Year Award" given by the Trial Lawyers for Public Justice. (No. A89-0095-CVCHRH (D. Alaska)).

In re Ashland Oil Spill Litigation: The firm led by Harold Berger served as co-lead counsel and obtained a \$30 million settlement for damages resulting from a very large oil spill. (Master File No. M-14670 (W.D. Pa.)).

State of Connecticut Tobacco Litigation: Berger Montague was one of three firms to represent the State of Connecticut in a separate action in state court against the tobacco companies. The case was litigated separate from the coordinated nationwide actions. Although eventually Connecticut joined the national settlement, its counsel's contributions were recognized by being awarded the fifth largest award among the states from the fifty states' Strategic Contribution Fund.

In re School Asbestos Litigation: As co-lead counsel, the firm successfully litigated a case in which a nationwide class of elementary and secondary schools and school districts suffering property damage as a result of asbestos in their buildings were provided relief. Pursuant to an approved settlement, the class received in excess of \$70 million in cash and \$145 million in discounts toward replacement building materials. (No. 83-0268 (E.D. Pa.)).

Drayton v. Pilgrim's Pride Corp.: The firm served as counsel in a consolidation of wrongful death and other catastrophic injury cases brought against two manufacturers of turkey products, arising out of a 2002 outbreak of *Listeria Monocytogenes* in the Northeastern United States, which resulted in the recall of over 32 million pounds of turkey – the second largest meat recall in U.S. history at that time. A significant opinion issued in the case is *Drayton v. Pilgrim's Pride Corp.*, 472 F. Supp. 2d 638 (E.D. Pa. 2006) (denying the defendants' motions for summary judgment and applying the alternative liability doctrine). All of the cases settled on confidential terms in 2006. (No. 03-2334 (E.D. Pa.)).

In re SEPTA 30th Street Subway/Elevated Crash Class Action: Berger Montague represented a class of 220 persons asserting injury in a subway crash. Despite a statutory cap of \$1 million on damages recovery from the public carrier, and despite a finding of sole fault of the public carrier in the investigation by the National Highway Transit Safety Administration, Berger Montague was able to recover an aggregate of \$3.03 million for the class. (1990 Master File No. 0001 (Pa. Ct. Com. Pls., Phila. Cty.)).

In re Three Mile Island Litigation: As lead/liason counsel, the firm successfully litigated the case and reached a settlement in 1981 of \$25 million in favor of individuals, corporations and other entities suffering property damage as a result of the nuclear incident involved. (C.A. No. 79-0432 (M.D. Pa.)).

False Claims Act/Qui Tam/Whistleblower

Berger Montague has represented whistleblowers in matters involving healthcare fraud, defense contracting fraud, IRS fraud, securities fraud, and commodities fraud, helping to return more than \$1.1 billion to federal and state governments. In return, whistleblower clients retaining Berger Montague to represent them in state and federal courts have received more than \$100 million in rewards. Berger Montague's time-tested approach in Whistleblower/Qui Tam representation involves cultivating close, productive attorney-client relationships with the maximum degree of confidentiality for its clients.

Government Representation

Berger Montague has successfully represented state, county and local governments in a wide array of matters for decades. In addition to working with state attorney general offices and other government officials in multiple securities class action and opt-out cases, the firm has also assisted its government clients in mortgage lending, consumer, environmental and a number of other matters.

Berger Montague's representation of government entities frequently involves important issues of public health and safety and requires vast experience, resources and knowledge. The firm understands the concerns of its government clients, their limited budgets and the public law enforcement interests at stake. The firm is also familiar with the special sensitivities government clients often have to what may become sprawling, prolonged and costly litigation. Berger Montague minimizes the burdens on its government clients and their personnel while also deferring to their ultimate control over each matter the firm undertakes. Leveraging the firm's substantial expertise and success across multiple practice areas, together with its nationwide reputation and steadfast resolve, enables the firm to effectively assist government clients whether in actual litigation or "behind-the-scenes" confidential investigations.

Insurance Fraud

When insurance companies and affiliated financial services entities engage in fraudulent, deceptive or unfair practices, Berger Montague helps injured parties recover their losses. The firm focuses on fraudulent, deceptive and unfair business practices across all lines of insurance and financial products and services sold by insurers and their affiliates, which include annuities, securities and other investment vehicles.

Spencer v. Hartford Financial Services Group, Inc.: The firm, together with co-counsel, prosecuted this national class action against The Hartford Financial Services Group, Inc. and its affiliates in the United States District Court for the District of Connecticut (*Spencer v. Hartford Financial Services Group, Inc.*, Case No. 05-cv-1681) on behalf of approximately 22,000 claimants, each of whom entered into structured settlements with Hartford property and casualty insurers to settle personal injury and workers' compensation claims. To fund these structured settlements, the Hartford property and casualty insurers purchased annuities from their affiliate, Hartford Life. By purchasing the annuity from Hartford Life, The Hartford companies allegedly were able to retain up to 15% of the structured amount of the settlement in the form of undisclosed costs, commissions and profit - all of which was concealed from the settling claimants. On March 10, 2009, the U.S. District Court certified for trial claims on behalf of two national subclasses for civil RICO and fraud (256 F.R.D. 284 (D. Conn. 2009)). On October 14, 2009, the Second Circuit Court of Appeals denied The Hartford's petition for interlocutory appeal under Federal Rule of Civil Procedure 23(f). On September 21, 2010, the U.S. District Court entered judgment granting final approval of a \$72.5 million cash settlement.

Nationwide Mutual Insurance Company v. O'Dell: The firm, together with co-counsel, prosecuted this class action against Nationwide Mutual Insurance Company in West Virginia Circuit Court, Roane County (*Nationwide Mutual Insurance Company v. O'Dell*, Case No. 00-C-37), on behalf of current and former West Virginia automobile insurance policyholders, which arose out of Nationwide's failure, dating back to 1993, to offer policyholders the ability to

purchase statutorily-required optional levels of underinsured (“UIM”) and uninsured (“UM”) motorist coverage in accordance with West Virginia Code 33-6-31. The court certified a trial class seeking monetary damages, alleging that the failure to offer these optional levels of coverage, and the failure to provide increased first party benefits to personal injury claimants, breached Nationwide’s insurance policies and its duty of good faith and fair dealing, and violated the West Virginia Unfair Trade Practices Act. On June 25, 2009, the court issued final approval of a settlement that provided a minimum estimated value of \$75 million to Nationwide auto policyholders and their passengers who were injured in an accident or who suffered property damage.

Predatory Lending & Borrower’s Rights

Berger Montague’s attorneys fight vigorously to protect the rights of borrowers when they are injured by the practices of banks and other financial institutions that lend money or service borrowers’ loans. Berger Montague has successfully obtained multi-million dollar class action settlements for nationwide classes of borrowers against banks and financial institutions and works tirelessly to protect the rights of borrowers suffering from these and other deceptive and unfair lending practices.

Representing Opt-Outs in Class Actions

Berger Montague offers exceptional representation of businesses, institutional investors, employee benefit or ERISA plans and governmental entities when they wish to opt out of securities and antitrust class actions filed by others and file an individual lawsuit to maximize their recovery or have a say in the proceedings. The firm advises and represents clients who may opt out of class actions filed by others – often securities fraud cases and price-fixing and monopolization antitrust claims – and helps them pursue their claims independently of the class action, where they often stand to receive a much greater financial recovery.

Securities & Investor Protection

In the area of securities litigation, the firm has represented public institutional investors – such as the retirement funds for the States of Pennsylvania, Connecticut, New Hampshire, New Jersey, Louisiana and Ohio, as well as the City of Philadelphia and numerous individual investors and private institutional investors. The firm was co-lead counsel in the *Melridge Securities Litigation* in the federal District Court in Oregon, in which jury verdicts of \$88.2 million and a RICO judgment of \$239 million were obtained. Berger Montague has served as lead or co-lead counsel in numerous other major securities class action cases where substantial settlements were achieved on behalf of investors.

In re Merrill Lynch Securities Litigation: Berger Montague, as co-lead counsel, obtained a recovery of \$475 million for the benefit of the class in one of the largest recoveries among the recent financial crisis cases. (No. 07-cv-09633 (S.D.N.Y.)).

In re Sotheby's Holding, Inc. Securities Litigation: The firm, as lead counsel, obtained a \$70 million settlement, of which \$30 million was contributed, personally, by an individual defendant. (No. 00-cv-1041 (DLC) (S.D.N.Y.)).

In re: Oppenheimer Rochester Funds Group Securities Litigation: The firm, as co-lead counsel, obtained a \$89.5 million settlement on behalf of investors in six tax-exempt bond mutual funds managed by Oppenheimer Funds, Inc. (No. 09-md-02063-JLK (D. Col.)).

In re KLA Tencor Securities Litigation: The firm, as a member of Plaintiffs' Counsel's Executive Committee, obtained a cash settlement of \$65 million in an action on behalf of investors against KLA- Tencor and certain of its officers and directors. (No. 06-cv-04065 (N.D. Cal.)).

Ginsburg v. Philadelphia Stock Exchange, Inc., et al.: The firm represented certain shareholders of the Philadelphia Stock Exchange in the Delaware Court of Chancery and obtained a settlement valued in excess of \$99 million settlement. (C.A. No. 2202-CC (Del. Ch.)).

In re Sepracor Inc. Securities Litigation: The firm, as co-lead counsel, obtained a settlement of \$52.5 million for the benefit of bond and stock purchaser classes. (No. 02-cv-12235-MEL (D. Mass.)).

In re CIGNA Corp. Securities Litigation: The firm, as co-lead counsel, obtained a settlement of \$93 million for the benefit of the class. (Master File No. 2:02-cv-8088 (E.D. Pa.)).

In re Fleming Companies, Inc. Securities Litigation: The firm, as lead counsel, obtained a class settlement of \$94 million for the benefit of the class. (No. 5-03-MD-1530 (TJW) (E.D. Tex.)).

In re Xcel Energy Inc. Securities, Derivative & "ERISA" Litigation: The firm, as co-lead counsel in the securities actions, obtained a cash settlement of \$80 million on behalf of investors against Xcel Energy and certain of its officers and directors. (No. 02-cv-2677 (DSD/FLN) (D. Minn.)).

In re NetBank, Inc. Securities Litigation: The firm served as lead counsel in this certified class action on behalf of the former common shareholders of NetBank, Inc. The \$12.5 million settlement, which occurred after class certification proceedings and substantial discovery, is particularly noteworthy because it is one of the few successful securities fraud class actions litigated against a subprime lender and bank in the wake of the financial crisis. (No. 07-cv-2298-TCB (N.D. Ga.)).

Brown v. Kinross Gold U.S.A. Inc.: The firm represented lead plaintiffs as co-lead counsel and obtained \$29.25 million cash settlement and an additional \$6,528,371 in dividends for a gross settlement value of \$35,778,371. (No. 02-cv-0605 (D. Nev.)) All class members recovered 100% of their damages after fees and expenses.

In re Campbell Soup Co. Securities Litigation: The firm, as co-lead counsel, obtained a settlement of \$35 million for the benefit of the class. (No. 00-cv-152 (JEI)(D.N.J.)).

In re Premiere Technologies, Inc. Securities Litigation: The firm, as co-lead counsel, obtained a class settlement of over \$20 million in combination of cash and common stock. (No.1:98-cv-1804-JOF (N.D. Ga.)).

In re PSINet, Inc., Securities Litigation: The firm, as co-lead counsel, obtained a settlement of \$17.83 million on behalf of investors. (No. 00-cv-1850-A (E.D. Va.)).

In re Safety-Kleen Corp. Securities Litigation: The firm, as co-lead counsel, obtained a class settlement in the amount of \$45 million against Safety-Kleen's outside accounting firm and certain of the Company's officers and directors. The final settlement was obtained 2 business days before the trial was to commence. (No. 3:00-cv-736-17 (D.S.C.)).

The City Of Hialeah Employees' Retirement System v. Toll Brothers, Inc.: The firm, as co-lead counsel, obtained a class settlement of \$25 million against Home Builder Toll Brothers, Inc. (No. 07-cv-1513 (E.D. Pa.)).

In re Rite Aid Corp. Securities Litigation: The firm, as co-lead counsel, obtained settlements totaling \$334 million against Rite Aid's outside accounting firm and certain of the company's former officers. (No. 99-cv-1349 (E.D. Pa.)).

In re Sunbeam Inc. Securities Litigation: As co-lead counsel and designated lead trial counsel (by Mr. Davidoff), the firm obtained a settlement on behalf of investors of \$142 million in the action against Sunbeam's outside accounting firm and Sunbeam's officers. (No. 98-cv-8258 (S.D. Fla.)).

In re Waste Management, Inc. Securities Litigation: In 1999, the firm, as co-lead counsel, obtained a class settlement for investors of \$220 million cash which included a settlement against Waste Management's outside accountants. (No. 97-cv-7709 (N.D. Ill.)).

In re IKON Office Solutions Inc. Securities Litigation: The firm, serving as both co-lead and liaison counsel, obtained a cash settlement of \$111 million in an action on behalf of investors against IKON and certain of its officers. (MDL Dkt. No. 1318 (E.D. Pa.)).

In re Melridge Securities Litigation: The firm served as lead counsel and co-lead trial counsel for a class of purchasers of Melridge common stock and convertible debentures. A four-month jury trial yielded a verdict in plaintiffs' favor for \$88.2 million, and judgment was entered on RICO claims against certain defendants for \$239 million. The court approved settlements totaling \$57.5 million. (No. 87-cv-1426 FR (D. Ore.)).

Aldridge v. A.T. Cross Corp.: The firm represented a class of investors in a securities fraud class action against A.T. Cross, and won a significant victory in the U.S. Court of Appeals for the First Circuit when that Court reversed the dismissal of the complaint and lessened the pleading standard for such cases in the First Circuit, holding that it would not require plaintiffs in a shareholder suit to submit proof of financial restatement in order to prove revenue inflation. See *Aldridge v. A.T. Cross Corp.*, 284 F.3d 72 (1st Cir. 2002). The case ultimately settled for \$1.5 million. (C.A. No. 00-203 ML (D.R.I.)).

Silver v. UICI: The firm, as co-lead counsel, obtained a settlement resulting in a fund of \$16 million for the class. (No. 3:99-cv-2860-L (N.D. Tex.)).

In re Alcatel Alsthom Securities Litigation: The firm, as co-lead counsel, obtained a class settlement for investors of \$75 million cash. (MDL Docket No. 1263 (PNB) (E.D. Tex.)).

Walco Investments, Inc. et al. v. Kenneth Thenen, et al. (Premium Sales): The firm, as a member of the plaintiffs' steering committee, obtained settlements of \$141 million for investors victimized by a Ponzi scheme. Reported at: 881 F. Supp. 1576 (S.D. Fla. 1995); 168 F.R.D. 315 (S.D. Fla. 1996); 947 F. Supp. 491 (S.D. Fla. 1996)).

In re The Drexel Burnham Lambert Group, Inc.: The firm was appointed co-counsel for a mandatory non-opt-out class consisting of all claimants who had filed billions of dollars in securities litigation-related proofs of claim against The Drexel Burnham Lambert Group, Inc. and/or its subsidiaries. Settlements in excess of \$2.0 billion were approved in August 1991 and became effective upon consummation of Drexel's Plan of Reorganization on April 30, 1992. (No. 90-cv-6954 (MP), Chapter 11, Case No. 90 B 10421 (FGC), Jointly Administered, reported at, *inter alia*, 960 F.2d 285 (2d Cir. 1992), *cert. dismissed*, 506 U.S. 1088 (1993) ("Drexel I") and 995 F.2d 1138 (2d Cir. 1993) ("Drexel II")).

In re Michael Milken and Associates Securities Litigation: As court-appointed liaison counsel, the firm was one of four lead counsel who structured the \$1.3 billion "global" settlement of all claims pending against Michael R. Milken, over 200 present and former officers and directors of Drexel Burnham Lambert, and more than 350 Drexel/Milken-related entities. (MDL Dkt. No. 924, M21-62-MP (S.D.N.Y.)).

RJR Nabisco Securities Litigation: The firm represented individuals who sold RJR Nabisco securities prior to the announcement of a corporate change of control. This securities case settled for \$72 million. (No. 88-cv-7905 MBM (S.D.N.Y.)).

Technology, Privacy & Data Breach

Berger Montague's Technology, Privacy & Data Breach practice group litigates on behalf of consumers nationwide to protect their privacy rights and seek redress when privacy violations occur.

In the modern economy where sensitive financial, medical and other personal information is routinely stored electronically in large data sets, protecting personal information is increasingly important. All too frequently, companies fail to protect consumers' personal information, leading to large privacy breaches with devastating consequences to consumers.

Berger Montague is committed to ensuring that the fundamental right to privacy is respected as technology evolves and society changes. The practice group's attorneys possess extensive experience and the requisite background to successfully litigate a comprehensive range of privacy claims. The firm represents individuals in cases impacting tens of thousands to hundreds of millions of Americans against both prominent and lesser-known companies for violations of privacy rights and the failure to protect sensitive personal data.

Beckett v. Aetna, Inc., No. 17-cv-03864 (E.D. Pa.). This case involved public disclosure of HIV information. Aetna mailed letters to 12,000 insureds with the insureds' HIV medication information visible through a large transparent window on the envelope. The HIV information was accessible to third parties such as family members, roommates, neighbors and mail carriers. The case settled in 2018 shortly after it was filed, resulting in a non-reversionary \$17 million fund. Each class member will receive an automatic payment of \$500 without being required to fill out a claim form, and class members will also be allowed to submit claims for up to \$20,000 for financial or non-financial harm resulting from the disclosure. Berger Montague serves as Co-Lead Counsel.

In re Experian Data Breach Litig., No. 15-cv-01592 (C.D. Cal.). Hackers stole 15 million Social Security numbers and related personal information from a big-3 credit reporting agency. Many plaintiffs experienced misuse of their personal information after the breach. The litigation is currently pending. Berger Montague serves on the Executive Committee.

In re: Anthem, Inc. Data Breach Litig., MDL 2617, No. 15-MD-02617 (N.D. Cal.). Hackers stole 80 million insureds' personal information including Social Security numbers and other sensitive information. Many plaintiffs experienced misuse of their personal information after the breach. The case settled in 2018 for benefits valued at \$115 million, representing the largest data breach settlement in history. Settlement benefits included reimbursement of identity theft losses and other out-of-pocket costs; credit monitoring services and identity theft insurance for two years, paid for by Anthem and substantial improvements to Anthem's data security systems. Berger Montague assisted lead counsel throughout the litigation.

In re: Medical Informatics Engineering, Inc. Customer Data Security Breach Litig., MDL 2667, No. 15-md-02667 (N.D. Ind.). Hackers stole medical and personal information for four million individuals from a medical records company. The litigation is currently pending. Berger Montague assists lead counsel.

In re: Heartland Payment Systems, Inc. Customer Data Security Breach Litig., MDL 2046, No. 09-MD-2046 (S.D. Tex.). Hackers stole more than 100 million credit and debit card numbers from a large credit card processor. The case settled in 2011 for a cash fund to reimburse out-of-pocket costs, and injunctive relief. Berger Montague served on the Steering Committee.

In re Countrywide Fin'l. Corp. Customer Data Security Breach Litig., MDL 1998, No. 08-MD-01998-TBR (W.D. Ky.). A Countrywide employee was arrested for stealing and selling Countrywide customers' Social Security numbers, bank account information and other sensitive data. The case settled in 2010 for benefits including two years of credit monitoring offered to 1.9 million individuals; a \$6.5 million cash fund to reimburse out-of-pocket losses for 17 million individuals and injunctive relief involving improvements to Countrywide's data security systems. Berger Montague served on the Executive Committee.

In re Hannaford Bros. Co. Customer Data Sec. Breach Litig., MDL 1954, No. 08-md-01954 (D. Me.). Hackers stole 4 million credit and debit card numbers from a large grocery store chain. The litigation led to groundbreaking appellate law recognizing the availability of damages for out-of-pocket credit monitoring costs and replacement credit card fees. *Anderson v. Hannaford Bros. Co.*, 659 F.3d 151, 167 (1st Cir. 2011). The appellate ruling serves as often-cited precedent in data breach litigation. Berger Montague assisted lead counsel throughout the litigation and on appeal.

In re TJX Cos. Retail Security Breach Litig., MDL No. 1838, No. 07-cv-10162-WGY (D. Mass.). Hackers stole 45 million credit and debit card numbers and 455,000 driver's license numbers, which in many instances matched Social Security numbers. The breach was the then-largest theft of consumer data in U.S. history. Berger Montague obtained a settlement in 2008 valued at over \$200 million, including: (i) two years of credit monitoring and identity theft insurance offered to 455,000 individuals whose driver's license numbers were exposed; (ii) a \$17 million fund offered to 45 million individuals to reimburse out-of-pocket costs and lost time to mitigate or correct actual or potential identity theft and (iii) injunctive relief regarding improvements to TJX's data security systems. These elements became the template for most subsequent data breach settlements. In approving the settlement, former Chief Judge William

Young praised the result as an “excellent settlement” containing “innovative” and “groundbreaking” elements. Berger Montague served as Co-Lead Counsel.

Judicial Praise for Berger Montague Attorneys

Berger Montague’s record of successful prosecution of class actions and other complex litigation has been recognized and commended by judges and arbitrators across the country. Some remarks on the skill, efficiency, and expertise of the firm’s attorneys are excerpted below.

From **Judge Madeline Cox Arleo** of the U.S. District Court for the District of New Jersey praising the efforts of all counsel:

I just want to thank you for an outstanding presentation. I don’t say that lightly . . . it’s not lost on me at all when lawyers come very, very prepared. And really, your clients should be very proud to have such fine lawyering. I don’t see lawyering like this every day in the federal courts, and I am very grateful. And I appreciate the time and the effort you put in, not only to the merits, but the respect you’ve shown for each other, the respect you’ve shown for the Court, the staff, and the time constraints. And as I tell my law clerks all the time, good lawyers don’t fight, good lawyers advocate. And I really appreciate that more than I can express.

Transcript of the September 9 to 11, 2015 *Daubert* Hearing in **antitrust** action *Castro v. Sanofi Pasteur*, No. 11-cv-07178 (D.N.J.) at 658:14-659:4.

From **Judge William H. Pauley, III**, of the U.S. District Court of the Southern District of New York:

Class Counsel did their work on their own with enormous attention to detail and unflagging devotion to the cause. Many of the issues in this litigation . . . were unique and issues of first impression.

* * *

Class Counsel provided extraordinarily high-quality representation. This case raised a number of unique and complex legal issues The law firms of Berger & Montague and Coughlin Stoia were indefatigable. They represented the Class with a high degree of professionalism, and vigorously litigated every issue against some of the ablest lawyers in the antitrust defense bar.

In re Currency Conversion Fee Antitrust Litigation, 263 F.R.D. 110, 129 (2009), an **antitrust** action.

From **Judge Faith S. Hochberg** of the U.S. District Court for the District of New Jersey:

[W]e sitting here don't always get to see such fine lawyering, and it's really wonderful for me both to have tough issues and smart lawyers ... I want to congratulate all of you for the really hard work you put into this, the way you presented the issues, ... On behalf of the entire federal judiciary I want to thank you for the kind of lawyering we wish everybody would do.

In re Remeron Antitrust Litig., Civ. No. 02-2007 (Nov. 2, 2005), an **antitrust** action.

From **Judge Jan DuBois** of the U.S. District Court of the Eastern District of Pennsylvania:

[T]he size of the settlements in absolute terms and expressed as a percentage of total damages evidence a high level of skill by petitioners ... The Court has repeatedly stated that the lawyering in the case at every stage was superb, and does so again.

In Re Linerboard Antitrust Litig., 2004 WL 1221350, at *5-*6 (E.D. Pa. 2004), an **antitrust** action.

From **Judge Nancy G. Edmunds** of the U.S. District Court of the Eastern District of Michigan:

[T]his represents an excellent settlement for the Class and reflects the outstanding effort on the part of highly experienced, skilled, and hard working Class Counsel....[T]heir efforts were not only successful, but were highly organized and efficient in addressing numerous complex issues raised in this litigation[.]

In re Cardizem CD Antitrust Litig., MDL No. 1278 (E.D. Mich., Nov. 26, 2002), an **antitrust** action.

From **Judge Charles P. Kocoras** of the U.S. District Court for the Northern District of Illinois:

The stakes were high here, with the result that most matters of consequence were contested. There were numerous trips to the courthouse, and the path to the trial court and the Court of Appeals frequently traveled. The efforts of counsel for the class has [sic] produced a substantial recovery, and it is represented that the cash settlement alone is the second largest in the history of class action litigation. . . . There is no question that the results achieved by class counsel were extraordinary[.]

In Re Brand Name Prescription Drugs Antitrust Litigation, 2000 U.S. Dist. LEXIS 1734, at *3-*6 (N.D. Ill. Feb. 9, 2000), regarding the work of Berger Montague in achieving more than \$700 million in settlements with some of the defendants in **antitrust** action.

From **Judge Peter J. Messitte** of the U.S. District Court for the District of Maryland:

The experience and ability of the attorneys I have mentioned earlier, in my view in reviewing the documents, which I have no reason to doubt, the plaintiffs' counsel are at the top of the profession in this regard and certainly have used their expertise to craft an extremely favorable settlement for their clients, and to that extent they deserve to be rewarded.

Settlement Approval Hearing, Oct. 28, 1994, in *Spawd, Inc. and General Generics v. Bolar Pharmaceutical Co., Inc.*, CA No. PJM-92-3624 (D. Md.), an **antitrust** action.

From **Judge Donald W. Van Artsdalen** of the U.S. District Court for the Eastern District of Pennsylvania:

As to the quality of the work performed, although that would normally be reflected in the not immodest hourly rates of all attorneys, for which one would expect to obtain excellent quality work at all times, the results of the settlements speak for themselves. Despite the extreme uncertainties of trial, plaintiffs' counsel were able to negotiate a cash settlement of a not insubstantial sum, and in addition, by way of equitable relief, substantial concessions by the defendants which, subject to various condition, will afford the right, at least, to lessee-dealers to obtain gasoline supply product from major oil companies and suppliers other than from their respective lessors. The additional benefits obtained for the classes by way of equitable relief would, in and of itself, justify some upward adjustment of the lodestar figure.

Bogosian v. Gulf Oil Corp., 621 F. Supp. 27, 31 (E.D. Pa. 1985), an **antitrust** action.

From **Judge Krupansky**, who has been elevated to the Sixth Circuit Court of Appeals:

Finally, the court unhesitatingly concludes that the quality of the representation rendered by counsel was uniformly high. The attorneys involved in this litigation are extremely experienced and skilled in their prosecution of antitrust litigation and other complex actions. Their services have been rendered in an efficient and expeditious manner, but have nevertheless been productive of highly favorable result.

In re Art Materials Antitrust Litigation, 1984 CCH Trade Cases ¶ 65, 815 (N.D. Ohio 1983), an **antitrust** action.

From **Judge Joseph Blumenfeld** of the U.S. District Court for the District of Connecticut:

The work of the Berger firm showed a high degree of efficiency and imagination, particularly in the maintenance and management of the national class actions.

In re Master Key Antitrust Litigation, 1977 U.S. Dist. LEXIS 12948, at *35 (Nov. 4, 1977), an **antitrust** action.

From **Judge Jed Rakoff** of the U.S. District Court for the Southern District of New York:

[Lead counsel made] very full and well-crafted ... excellent submissions ... very fine job done by plaintiffs' counsel in this case ... [this was] surely a very good result under all the facts and circumstances.

In re Merrill Lynch & Co., Inc. Securities, Derivative & ERISA Litigation, Master File No. 07-cv-9633(JSR)(DFE) (S.D.N.Y., July 27, 2009), a **securities** action.

From **Judge Michael M. Baylson** of the U.S. District Court for the Eastern District of Pennsylvania:

The Court is aware of and attests to the skill and efficiency of class counsel: they have been diligent in every respect, and their briefs and arguments before the Court were of the highest quality. The firm of Berger & Montague took the lead in the Court proceedings; its attorneys were well prepared, articulate and persuasive.

In re CIGNA Corp. Sec. Litig., 2007 U.S. Dist. LEXIS 51089, at *17-*18 (E.D. Pa. July 13, 2007). a **securities** action.

From **Chancellor William Chandler, III** of the Delaware Chancery Court:

All I can tell you, from someone who has only been doing this for roughly 22 years, is that I have yet to see a more fiercely and intensely litigated case than this case. Never in 22 years have I seen counsel going at it, hammer and tong, like they have gone at it in this case. And I think that's a testimony – Mr. Valihura correctly says that's what they are supposed to do. I recognize that; that is their job, and they were doing it professionally.

Ginsburg v. Philadelphia Stock Exchange, Inc., No. 2202 (Del. Ch., Oct. 22, 2007), a **securities** action.

From **Judge Stewart Dalzell** of the U.S. District Court for the Eastern District of Pennsylvania:

Thanks to the nimble class counsel, this sum, which once included securities worth \$149.5 million is now all cash. Seizing on an opportunity Rite Aid presented, class counsel first renegotiated what had been stock consideration into Rite Aid Notes and then this year monetized those Notes. Thus, on February

11, 2003, Rite Aid redeemed those Notes from the class, which then received \$145,754,922.00. The class also received \$14,435,104 in interest on the Notes.

...

Co-lead counsel ... here were extraordinarily deft and efficient in handling this most complex matter... they were at least eighteen months ahead of the United States Department of Justice in ferreting out the conduct that ultimately resulted in the write down of over \$1.6 billion in previously reported Rite Aid earnings. In short, it would be hard to equal the skill class counsel demonstrated here.

In re Rite Aid Corp. Securities Litigation, 269 F. Supp. 2d 603, 605, n.1, 611 (E.D. Pa.2003), a securities action.

From **Judge Helen J. Frye**, United States District Judge for the U.S. District Court for the District of Oregon:

In order to bring about this result [partial settlements then totaling \$54.25 million], Class Counsel were required to devote an unusual amount of time and effort over more than eight years of intense legal litigation which included a four-month long jury trial and full briefing and argument of an appeal before the Ninth Circuit Court of Appeals, and which produced one of the most voluminous case files in the history of this District.

* * *

Throughout the course of their representation, the attorneys at Berger & Montague and Stoll, Stoll, Berne, Lokting & Shlachter who have worked on this case have exhibited an unusual degree of skill and diligence, and have had to contend with opposing counsel who also displayed unusual skill and diligence.

In Re Melridge, Inc. Securities Litigation, No. CV 87-1426-FR (D. Ore. April 15, 1996), a securities action.

From **Judge Marvin Katz** of the U.S. District Court for the Eastern District of Pennsylvania:

[T]he co-lead attorneys have extensive experience in large class actions, experience that has enabled this case to proceed efficiently and professionally even under short deadlines and the pressure of handling thousands of documents in a large multi-district action... These counsel have also acted vigorously in their clients' interests....

* * *

The management of the case was also of extremely high quality.... [C]lass counsel is of high caliber and has extensive experience in similar class action litigation.... The submissions were of consistently high quality, and class counsel has been notably diligent in preparing filings in a timely manner even when under tight deadlines.

In re Ikon Office Solutions, Inc. Securities Litigation, 194 F.R.D. 166, 177, 195 (E.D. Pa. 2000), commenting on class counsel, where the firm served as both co-lead and liaison counsel in this securities action.

From **Judge William K. Thomas**, Senior District Judge for the United States District Court for the Northern District of Ohio:

In the proceedings it has presided over, this court has become directly familiar with the specialized, highly competent, and effective quality of the legal services performed by Merrill G. Davidoff, Esq. and Martin I. Twersky, Esq. of Berger & Montague....

* * *

Examination of the experience-studded biographies of the attorneys primarily involved in this litigation and review of their pioneering prosecution of many class actions in antitrust, securities, toxic tort matters and some defense representation in antitrust and other litigation, this court has no difficulty in approving and adopting the hourly rates fixed by Judge Aldrich.

In re Revco Securities Litigation, Case No. 1:89CV0593, Order (N.D. Oh. September 14, 1993), a securities action.

From **Deputy Treasury Secretary Stuart E. Eizenstat**:

We must be frank. It was the American lawyers, through the lawsuits they brought in U.S. courts, who placed the long-forgotten wrongs by German companies during the Nazi era on the international agenda. It was their research and their work which highlighted these old injustices and forced us to confront them. Without question, we would not be here without them.... For this dedication and commitment to the victims, we should always be grateful to these lawyers.

in his remarks at the July 17, 2000 signing ceremony for the international agreements which established the German Foundation to act as a funding vehicle for the payment of claims to Holocaust survivors.

From **Judge Janet C. Hall**, of the U.S. District Court of the District of Connecticut, noting:

[V]ery significant risk in pursuing this action [given its] uniqueness [as] there was no prior investigation to rely on in establishing the facts or a legal basis for the case....[and] no other prior or even now similar case involving parties like these plaintiffs and a party like these defendants.

...

[T]he quality of the representation provided to the plaintiffs ... in this case has been consistently excellent.... [T]he defendant[s] ... mounted throughout the course of the five years the case pended, an extremely vigorous defense.... [B]ut for counsel's outstanding work in this case and substantial effort over five years,

no member of the class would have recovered a penny.... [I]t was an extremely complex and substantial class ... case ... [with an] outstanding result.

Spencer, et al. v. The Hartford Financial Services Group, Inc., et al., order approving the \$72.5 million final settlement of this action, dated September 21, 2010 (No. 3:05-cv-1681, D. Conn.), regarding the work of Berger Montague attorneys Peter R. Kahana and Steven L. Bloch, among other co-class counsel, in this [insurance fraud](#) action.

From **Judge Harold E. Kahn**, Dep't 302, Superior Court of Cal., San Fran. Cnty.:

You're very articulate on this issue. ... Obviously, you're very thoughtful and you have given it a great deal of thought. ... And I appreciate your ability to respond to my questions off the cuff. ... It shows that you have given these issues a lot of thought ... I have to say that your thoughtfulness this morning has somewhat diminished my concerns [regarding high multiplier on attorney fees]... You're demonstrating credibility by a mile as you go....You are extraordinarily impressive. And I thank you for being here, and for your candid, noninvasive [sic] response to every question I have. I was extremely skeptical at the outset this morning. You have allayed all of my concerns and have persuaded me that this is an important issue, and that you have done a great service to the class. And for that reason, I am going to approve your settlement in all respects... And I congratulate you on your excellent work.

Nov. 7, 2017, Final Approval Hearing, *Nesbitt v. Postmates, Inc.*, No. CGC-15-547146, regarding Berger Montague shareholder E. Michelle Drake in this [credit reporting & background checks class action](#).

From **Judge Laurie J. Michelson**, U.S. District Court for the Eastern District of Michigan:

Counsel's quality of work in this case was high. The Court has been impressed with counsel's in-court arguments. And counsel has provided the Court with quality briefing as well.

Aug. 11, 2017, Opinion & Order on Mtn. for Atty. Fees, and Mtn. for Final Approval, *Hillson v. Kelly Services, Inc.*, No. 15-cv-10803, regarding Berger Montague shareholder E. Michelle Drake, and other co-lead counsel, in this [credit reporting & background checks class action](#).

From **Magistrate Judge Terence P. Kemp**, U.S. District Court for the Southern District of Ohio:

The parties in this case are represented by counsel with substantial experience in class action litigation, and FCRA cases in particular. ... Class Counsel are experienced and knowledgeable in FCRA litigation, are skilled, and are in good standing.

June 30, 2017, Report & Recomm'n. on Final Approval, *Rubio-Delgado v. Aerotek, Inc.*, No. 16-cv-1066, regarding Berger Montague shareholder E. Michelle Drake, and other co-lead counsel, in this [credit reporting & background checks class action](#).

From **Judge Paul A. Magnuson**, U.S. District Court for the District of Minnesota:

[T]he class representatives and their counsel more than adequately protected the class's interests. ... [T]he comprehensive nature of the settlement in turn, reflects the adequacy, indeed the superiority, of the representation the class received from its named Plaintiffs and from class counsel.

May 17, 2017, Mem. & Order on Mtn. to Certify Class, *In re Target Corp. Customer Data Sec. Breach Litig.*, MDL No. 14-2522, regarding Berger Montague shareholder E. Michelle Drake, and other lead counsel, in this [data breach class action](#).

From **Magistrate Judge Jonathan W. Feldman** of the U.S. District Court for the Western District of New York:

First of all, I want to tell both parties that the briefing was really, really good here. And both briefs were very well written and persuasive. .. the arguments were as good as the briefing, so good job.

Transcript of the June 14, 2018 Hearing in *Koppers v. Weyerhaeuser Company*, Case No. 17-cv-6557 (W.D.N.Y.), in a [defective products](#) class action.

From **Robert E. Conner**, Public Arbitrator with the National Association of Securities Dealers, Inc.:

[H]aving participated over the last 17 years in 400 arbitrations and trials in various settings, ... the professionalism and the detail and generally the civility of everyone involved has been not just a cause for commentary at the end of these proceedings but between ourselves [the arbitration panel] during the course of them, and ... the detail and the intellectual rigor that went into the documents was fully reflective of the effort that was made in general. I wanted to make that known to everyone and to express my particular respect and admiration.

June 13, 2000 at Closing Argument, *Steinman v. LMP Hedge Fund, et al.*, NASD Case No. 98-04152, about the efforts of Berger Montague shareholders Merrill G. Davidoff and Eric L. Cramer, who achieved a \$1.1 million award for their client, in this arbitration.

From **Stephen M. Feiler, Ph.D.**, Director of Judicial Education, Supreme Court of Pennsylvania, Administrative Office of Pennsylvania Courts, Mechanicsburg, PA, on behalf of the Common Pleas Court Judges (trial judges) of Pennsylvania:

On behalf of the Supreme Court of Pennsylvania and AOPC's Judicial Education Department, thank you for your extraordinary commitment to the *Dealing with Complexities in Civil Litigation* symposia. We appreciate the considerable time you spent preparing and delivering this important course across the state. It is no surprise to me that the judges rated this among the best programs they have attended in recent years.

regarding the efforts of Berger Montague attorneys Merrill G. Davidoff, Peter Nordberg and David F. Sorensen in planning and presenting a CLE Program to trial judges in the Commonwealth of Pennsylvania.

Exhibit B

E. MICHELLE DRAKE

BERGER MONTAGUE PC
43 SE Main Street, Suite 505
Minneapolis, Minnesota 55414
612.594.5933
emdrake@bm.net



Experience

Admissions

- ◇ U.S. Supreme Court, 2017
- ◇ State Bar of Georgia, 2001
- ◇ Georgia Supreme Court, 2006
- ◇ Minnesota Supreme Court, 2007
- ◇ U.S. Court of Appeals for the 8th Cir., 2010
- ◇ U.S. Court of Appeals for the 1st Cir., 2011
- ◇ U.S. Court of Appeals for the 7th Cir., 2014
- ◇ U.S. Court of Appeals for the 9th Cir., 2015
- ◇ U.S. Court of Appeals for the 10th Cir., 2018
- ◇ U.S. Court of Appeals for the 3d Cir., 2019
- ◇ U.S. District Court for the Northern District of Georgia, 2007
- ◇ U.S. District Court for the District of Minnesota, 2007
- ◇ U.S. District Court for the Eastern District of Wisconsin, 2011
- ◇ U.S. District Court for the Western District of Texas, 2011
- ◇ U.S. District Court for the Western District of Wisconsin, 2015
- ◇ U.S. District Court for the Eastern District of Michigan, 2015
- ◇ U.S. District Court for the Central District of Illinois, 2016
- ◇ U.S. District Court for the Southern District of Texas, 2017
- ◇ U.S. District Court for the District of Colorado, 2017
- ◇ U.S. District Court for the Western District of New York, 2017
- ◇ U.S. District Court for the Western District of Michigan, 2018

Shareholder Berger Montague

Minneapolis, Minnesota

January 2016-present

Manage the firm's Minneapolis office. Chair of the Credit Reporting and Background Checks practice group. Chair of the Credit Reporting and Background Checks Practice Group. Co-chair of the Consumer Protection and Technology, Privacy & Data Breach practice groups. Serve as lead class counsel on dozens of consumer class actions filed throughout the United States, including cases involving improper credit and background reporting, defective consumer products and unlawful financial services practices.

Partner

Nichols Kaster, PLLP

Minneapolis, Minnesota

May 2007-December 2015

Represented thousands of employees and consumers in collective and class actions. Led the firm's Consumer Class Action Team which originated individual and class action cases.

Solo Practitioner

E. Michelle Drake, LLC

Atlanta, Georgia

March 2006-May 2007

Practiced both civil and criminal law. Served as "of counsel" attorney to Richard S. Alembik, P.C., a civil firm focused on real estate litigation. Served as co-counsel in pending death penalty case which was accepted by the Georgia Supreme Court for interim appellate review.

Attorney

Georgia Capital Defender Office

Atlanta, Georgia

October 2004-March 2006

Provided trial level representation for indigent clients facing the death penalty. Directed all aspects of death penalty litigation in capital cases throughout Georgia.

Staff Attorney

Fulton County Conflict Defender, Major Case Division

Atlanta, Georgia

May 2002-August 2004

Served as lead counsel for over one hundred indigent defendants facing felony criminal charges. Had primary responsibility for cases where juveniles were being tried as adults in Superior Court. Served as lead counsel in four murder trials to verdict.

Staff Attorney

Fulton County Public Defender,

Atlanta, Georgia

August 2001-May 2002

Served as lead counsel for pre-indictment felony cases and probation revocations.

Law Clerk**Defense Team For Kristen Gilbert**

Springfield, Massachusetts

Fall 1999-May 2001

Assisted in the first federal death penalty trial in Massachusetts. Lived in Springfield, MA three days a week during last year of law school to assist with eighth month trial which resulted in a life sentence.

Recent
Judicial Praise

*You're **very articulate** on this issue... Obviously, you're **very thoughtful** and you have given it a great deal of thought... You're **demonstrating credibility by a mile** as you go ... You are **extraordinarily impressive**... You have allayed all of my concerns and have persuaded me that this is an important issue, and that **you have done a great service to the class**... I congratulate you on your **excellent work**.*

Hon. Harold E. Kahn, Cal. Super. Ct., San Fran. Cnty., Nov. 7, 2017 Final Approval Hearing, Nesbitt v. Postmates, Inc., No. CGC-15-547146 (emphasis added)

Education**Harvard Law School, J.D., cum laude***June 2001*

Recipient of Edith Fine Fellowship, awarded to graduating woman most committed to public interest law. Recipient of Kauffman Fellowship, awarded to graduating students most committed to public interest law. Co-chair of Harvard Innocence and Justice Project, an organization which provided legal research and assistance to capital defense attorneys nationwide.

Oxford University, M.Sc. in Sociology*June 1998*

Recipient of Rotary International Ambassadorial Scholarship, nominated by Edina Rotary Club. Thesis: *Criticisms of Herbert Packer's Two Models of the Criminal Process*.

Harvard College, B.A. in Government, cum laude*June 1996*

Harvard Nominee for the Rhodes Scholarship. Graduated with Advanced Standing (in three years instead of four).

Titles, Awards, Memberships

Partner's Council Member for the National Consumer Law Center, 2014 – present

Board Member for the National Association of Consumer Advocates, 2014 – present

Board Member for the Southern Center for Human Rights, 2018 – present

CO-Chair of Minnesota State Bar Association Consumer Litigation Section, 2016 – present

Member of Ethics Committee for the National Association of Consumer Advocates, 2015

2014-2015 Treasurer, MSBA Consumer Litigation Section Council. 2013-14 At-Large Council Member.

Named to The Best Lawyers of America since 2016

Named to the Top 50 Women Minnesota Super Lawyers since 2015

Named to the Super Lawyers list, Minnesota Super Lawyers, Minneapolis/St. Paul Magazine, and Minnesota Business Journal, 2013 - 2019

Named to the Rising Stars list, Minnesota Super Lawyers, Minneapolis/St. Paul Magazine, and Minnesota Business Journal, 2011-2012

Federal Practice Committee, U.S. District Court, Minnesota, Appointed 2010

Thurgood Marshall Defender Award, Massachusetts Committee for Public Counsel Services Recipient, 2001

American Bar Association Member

Federal Bar Association Member

Hennepin County Bar Association Member

Minnesota Association for Justice Member

Minnesota State Bar Association Member

National Association of Consumer Advocates Member

Public Justice Member

American Association for Justice Member

Publications/Speaking Engagements

“Fair Credit Reporting Act/Debt Collection Issues,” 24th Annual Consumer Financial Services Institute, Practising Law Institute, Chicago, IL, May 2019.

“Ethics Session: Referrals and Fee-Sharing,” Fair Credit Reporting Act Conference, National Association of Consumer Advocates, Long Beach, CA, May 2019.

Contributing Author, “Consumer Law,” The Complete Lawyer’s Quick Answer Book, Minnesota Continuing Legal Education, 2d. ed. (forthcoming.)

Contributing Author, “Financial and Criminal Background Checks,” Job Applicant Screening: A Practice Guide, Minnesota Continuing Legal Education Publication, 2d. Edition (forthcoming).

Contributing Author, “Chapter 1: Case and Claims Selection, Other First Considerations,” Consumer Class Actions, National Consumer Law Center, 10th ed. (forthcoming),

“Consumer Law: Recent Trends and Hot Topics in FCRA Litigation,” Minnesota Continuing Legal Education, Minneapolis, MN, January 2019.

“Diamonds in the Rough: Identifying Good Class Claims,” Mass Torts Made Perfect Fall Seminar, Las Vegas, NV, October 2018.

“Nationwide Settlement Classes – The Impact of the Hyundai/Kia Litigation,” Class Action Symposium, Consumer Rights Litigation Conference, National Consumer Law Center, Denver, CO, October 2018.

“Developments in Public Records Litigation,” Consumer Rights Litigation Conference, National Consumer Law Center, Denver, CO, October 2018.

“Big Challenges in the City of BIG Shoulders, Electronic Discovery’s Rise to Prominence,” ABA 22nd Annual National Institute on Class Actions, Chicago, IL, October 2018.

“Jurisdiction Issues Post *Bristol-Myers*,” Bridgeport 2018 Class Action Litigation Conference, San Francisco, CA, September 2018.

“New Developments in the Law of Personal Jurisdiction in the Aftermath of the Supreme Court’s Decisions in *BNSF Railway Co. v. Tyrrell* and *Bristol Myers* and the Strategies,” Plaintiffs’ Class Action Roundtable, Rancho Palos Verdes, CA, April 2018.

“New Developments in Personal Jurisdiction,” Litigator’s Short Course, Minnesota Continuing Legal Education, Minneapolis, MN, February 2018.

“Game Changing Blindspots that Create Privacy Liabilities – a Plaintiff-Side Litigator’s Insights,” Midwest Legal Conference on Privacy & Data Security, Minneapolis, MN, January 2018.

“Federal Discovery: Winning Your Cases Early,” “FCRA Report Disclosures: Issues and Litigation,” Consumer Rights Litigation Conference, National Consumer Law Center, Washington, D.C., November 2017.

“Strategic Response to Recent Supreme Court Decision in *Bristol-Myers*,” Consumer Rights Litigation Conference, Class Action Symposium, National Consumer Law Center, Washington, D.C., November 2017.

Conference Co-Chair, “Class Actions: Legislative Developments, Updates & More,” CLE International, Los Angeles, CA, November 2017.

“The Times They Are a-Changin’: The Role of Administrative Agencies and Private Counsel in the Trump Era,” American Bar Association Annual National Institute on Class Actions, Washington, D.C., October 2017.

“The CFPB’s New Rule on Arbitration: What It Is and What Comes Next,” Minnesota State Bar Association Continuing Legal Education Presentation, Minneapolis, MN, September 2017.

“Standing: Assessing Article III Jurisdiction One Year After Spokeo,” Minnesota State Bar Association Continuing Legal Education Presentation, Minneapolis, MN, June 2017.

“House Resolution 985 – Update and Strategies for Defeat,” Cambridge Forums – Plaintiffs’ Class Action Forum, Carefree, AZ, May 2017.

“TCPA/Fair Credit Reporting Act/Debt Collection Issues,” PLI 22nd Annual Consumer Financial Services Institute, Chicago, IL, May 2017.

“Case Law and Recent Trial Update,” Panelist, Fair Credit Reporting Act Conference, National Association of Consumer Advocates, Baltimore, MD, April 2017.

“Using the FCRA for Criminal Background Checks,” “Spokeo Standing Challenges (and Opportunities).” Consumer Rights Litigation Conference, National Consumer Law Center, Anaheim, CA, October 2016.

“Appeals: Whether, When and How.” Consumer Rights Litigation Conference Class Action Symposium, National Consumer Law Center, Anaheim, CA, October 2016.

“Recent Developments in Food Class Action Litigation.” Perrin Food & Beverage Litigation Conference, New York, NY, October 2016.

“A Winning Hand or a Flop? After 50 Years are Class Actions Still Legit?” American Bar Association Annual National Institute on Class Actions, Las Vegas, NV, October 2016.

Contributing Author, “Consumer Law,” The Complete Lawyer’s Quick Answer Book, Minnesota Continuing Legal Education, 2016.

“Changing Standard for Class Certification Including a Discussion of the Use of Experts and Statistical Sampling at Class Certification in Light of Spokeo and Tyson.” Bridgeport Continuing Education 2016 Class Action Litigation Conference, San Francisco, CA, September 2016.

“The U.S. Supreme Court’s Big New Decisions.” Minnesota Continuing Legal Education Presentation, Minneapolis, MN, August 2016.

“The Complete Lawyer Series: Consumer Law, Debt Collection and Credit Reporting.” Minnesota Continuing Legal Education Webcast, Minneapolis, MN, July 2016.

“What Does the Spokeo Decision Mean for Consumer Lawyers.” National Association of Consumer Advocates Webinar, May 2016.

“Hot Button Consumer Issues.” Practising Law Institute’s Annual Consumer Financial Services Institute, Chicago, IL, May 2016.

“Consumer Law.” Minnesota Continuing Education Seminar, Minneapolis, MN, May 2016.

“Hot Topics in Class Actions.” Bridgeport Class Action Conference, Hollywood, CA, April 2016.

“Hot Button Consumer Issues.” Practicing Law Institute’s Annual Consumer Financial Services Institute, New York, NY, April 2016.

“Beyond the Headlines – What EVERY Lawyer Should Know About the U.S. Supreme Court’s Big New Decisions.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, August 2015.

“Financial and Criminal Background Checks.” National Employment Lawyers Association Annual Convention Presentation, Atlanta, GA, June 2015.

“The Complete Lawyer: Consumer Law.” Minnesota Continuing Legal Education Presentation, Minneapolis, MN, May 2015.

“Protecting Your Plaintiffs and the Class: Rule 68 Offers and Other Pick-Off Tactics.” Impact Fund Class Action Conference, Berkeley, CA, February 2015.

“Be Careful what you Wish For: Trends in Arbitration.” ACI Wage & Hour Claims and Class Actions Summit Panel, Miami, FL, January 2015.

“Job Applicant Screening, Financial & Criminal Background Checks – Applicant Rights and Employer Best Practices.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, December 2014.

“Economics of Objecting for the Right Reasons.” Class Action Symposium Panel, National Consumer Rights Litigation Conference, Tampa, FL, November 2014.

“Data Harvesting, Background Checks, and the Fair Credit Reporting Act for Criminal Attorneys.” Criminal Law Section, Minnesota State Bar Association Presentation, November 2014.

“Discovery Strategies in Class Actions: When Less is More and When it Isn’t.” Bridgeport Class Action Conference, Chicago, IL, June 2014.

“Job Applicant Screening Crash Course.” Upper Midwest Employment Law Institute, Saint Paul, MN, May 2014.

“Financial and Criminal Background Checks.” Job Applicant Screening: A Practice Guide, Minnesota Continuing Legal Education Publication, May 2014.

“The Complete Lawyer: Quick Answers to Questions about Consumer Law.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, May 2014.

“Employment Law 360.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, February 2014.

“Precertification Discovery Strategies including Issues of Standing & Certification.” Bridgeport Class Action Conference, San Francisco, CA, August 2013.

“Beyond the Headlines – What Every Lawyer Should Know About the U.S. Supreme Court’s Big New Decision.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, August 2013.

“The Complete Lawyer: Quick Answers to Questions about Consumer Law.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, June 2013.

“The Misclassification Mess – What Do You Do If You Have Misclassified Workers as Exempt?” Upper Midwest Employment Law Institute, Minneapolis, MN, May 2013.

“Housing Finance – Consumer Financial Services.” Panelist, American Bar Association Business Law Section Spring Meeting, Washington, D.C., April 2013.

“5 Developments in E-Discovery.” The Civil Litigator’s Annual Short Course, Minnesota Continuing Legal Education, Minneapolis, MN, February 2013.

“Employment Rights & Criminal Backgrounds in the Context of the FCRA and Title VII.” Goodwill Easter Seals Presentation, Saint Paul, MN, December 2012.

“Federal Court 101.” National Business Institute Webinar, Eau Claire, WI, December 2012.

“Employment Law Series: Ethics Issues for Employment Law Lawyers.” Minnesota Continuing Legal Education Webcast, Minneapolis, MN, October 2012.

“Real World Ethics Issues and Answers for the Employment Lawyer.” Upper Midwest Employment Law Institute, Minneapolis, MN, May 2012.

“Real World Ethics Issues and Answers for the Employment Lawyer.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, November 2011.

“The Complete Lawyer: Consumer Law 101.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, November 2011.

“Litigation and the Federal Rules. What Every Paralegal Should Know”, National Federation of Paralegal Associations, Annual Convention, Bloomington, MN, October 2011.

“Dukes v. Wal-Mart: the View from the Plaintiff’s Bar.” American Conference Institute’s Defending and Managing Retaliation and Discrimination Claims Conference, New York City, NY, July 2011.

“How to Practice in Federal Court: Complaints, Answers, and Service of Process.” Minnesota Continuing Legal Education Seminar, Minneapolis, MN, October 2010.

“Recent Trends in FLSA Collective Actions Panel.” Minnesota Federal Bar Association Annual Seminar, Minneapolis, MN, June 2010,

Minnesota Continuing Legal Education Panel on Real-World Ethics Issues and Answers for the Employment Lawyer, Minneapolis, MN, June 2010.

"Maintaining Privilege and Confidentiality." National Federation of Paralegal Association Annual Convention, Bloomington, MN, June 2010.

"Strategic Discovery Practice", Upper Midwest Employment Law Institute, Minneapolis, MN, May 2010.

Minnesota Continuing Legal Education Panel on the Impact of Twombly and Iqbal on the Pleading standard, Minneapolis, MN, February 2010.

Interviewed by National Law Journal regarding recent wave of tip pooling cases (June 2009).

Strategic Discovery: How to Fight Discovery Abuses and Win Discovery Disputes, Minnesota Institute for Continuing Legal Education (May 2009).

Who's the Boss? Joint employers, successor employers and integrated enterprises, Equal Employment Opportunity Commission Investigator training (March 2008).

Litigating Capital Cases Under Georgia's New Discovery Statutes, Advanced Capital Defender Training (St. Simons Island, GA, January 2006).

Responding to Changes in Georgia's Criminal Discovery Statutes, Advanced Capital Defender Training. (St. Simons Island, GA, July 2005).

Exhibit C

Date	Staff_ID	Staff Name	Work_Description (m)	Hours	Rate	Amount
7/24/2015	EMD	E. Michelle Drake	Email client re [REDACTED].	0.1	\$ 725.00	\$72.50
7/28/2015	EMD	E. Michelle Drake	Email client re [REDACTED].	0.1	\$ 725.00	\$72.50
8/3/2015	EMD	E. Michelle Drake	Email client re [REDACTED].	0.1	\$ 725.00	\$72.50
8/6/2015	EMD	E. Michelle Drake	Travel to PHL for client meeting.	2	\$ 725.00	\$1,450.00
8/6/2015	EMD	E. Michelle Drake	Begin drafting complaint.	2.4	\$ 725.00	\$1,740.00
8/6/2015	EMD	E. Michelle Drake	Legal research on [REDACTED].	0.8	\$ 725.00	\$580.00
8/7/2015	JKH	E. Michelle Drake	Edit draft complaint, research corporation.	0.3	\$ 285.00	\$85.50
8/7/2015	EMD	E. Michelle Drake	Drive to/from and meet with client.	1.5	\$ 725.00	\$1,087.50
8/7/2015	EMD	E. Michelle Drake	Review documents and correspondence prior to client meeting.	0.4	\$ 725.00	\$290.00
8/9/2015	EMD	E. Michelle Drake	Email Beth Terrell re [REDACTED].	0.2	\$ 725.00	\$145.00
8/9/2015	EMD	E. Michelle Drake	Travel back from PHL to MSP.	4.5	\$ 725.00	\$3,262.50
8/11/2015	EMD	E. Michelle Drake	Review and respond to email from client; [REDACTED].	0.4	\$ 725.00	\$290.00
8/11/2015	EMD	E. Michelle Drake	Email with Beth Terrell re [REDACTED].	0.3	\$ 725.00	\$217.50
8/12/2015	EMD	E. Michelle Drake	Email with Beth Terrell re [REDACTED].	0.2	\$ 725.00	\$145.00
8/12/2015	JGA	John G. Albanese	Review file.	0.3	\$ 450.00	\$135.00
8/12/2015	JGA	John G. Albanese	Research [REDACTED].	0.4	\$ 450.00	\$180.00
8/12/2015	JKH	Jean K. Hibray	Draft co-counsel agreement.	0.1	\$ 285.00	\$28.50
8/13/2015	JGA	John G. Albanese	Email co-counsel agreement.	0.1	\$ 450.00	\$45.00
8/19/2015	JGA	John G. Albanese	Email Michelle Drake regarding [REDACTED].	0.1	\$ 450.00	\$45.00
8/19/2015	EMD	E. Michelle Drake	Call with Beth Terrell re [REDACTED].	0.3	\$ 725.00	\$217.50
8/19/2015	EMD	E. Michelle Drake	Email JGA re [REDACTED].	0.2	\$ 725.00	\$145.00
8/20/2015	JGA	John G. Albanese	Research [REDACTED].	0.8	\$ 450.00	\$360.00
8/20/2015	JGA	John G. Albanese	Listen to voicemail from [REDACTED].	0.1	\$ 450.00	\$45.00
8/25/2015	JGA	John G. Albanese	Review edits to complaint.	0.5	\$ 450.00	\$225.00
8/25/2015	JGA	John G. Albanese	Email co-counsel regarding complaint.	0.1	\$ 450.00	\$45.00
8/27/2015	JGA	John G. Albanese	Edit preservation letter.	0.2	\$ 450.00	\$90.00
8/27/2015	JGA	John G. Albanese	Review filed documents and send to Jean to put out for service.	0.1	\$ 450.00	\$45.00
8/27/2015	JKH	Jean K. Hibray	Prepare preservation/service letter, prepare service packet, correspond with messenger.	0.5	\$ 285.00	\$142.50
9/1/2015	EMD	E. Michelle Drake	Email client re [REDACTED].	0.3	\$ 725.00	\$217.50
9/22/2015	JGA	John G. Albanese	Research [REDACTED].	0.4	\$ 450.00	\$180.00
9/28/2015	JGA	John G. Albanese	Review pro hac vice motions.	0.1	\$ 450.00	\$45.00
9/28/2015	EMD	E. Michelle Drake	Review answer, email co counsel re good allegations to follow up on.	0.4	\$ 725.00	\$290.00
9/28/2015	JKH	Jean K. Hibray	Prepare pro hacs now that case is removed.	0.2	\$ 285.00	\$57.00
10/1/2015	JKH	Jean K. Hibray	Review defendant's answer.	0.1	\$ 285.00	\$28.50
10/5/2015	JKH	Jean K. Hibray	Draft jury demand.	0.1	\$ 285.00	\$28.50
10/5/2015	JKH	Jean K. Hibray	Finalize and file jury demand	0.1	\$ 285.00	\$28.50
11/10/2015	JGA	John G. Albanese	Email opposing counsel regarding 26(f) conference.	0.2	\$ 450.00	\$90.00
11/10/2015	DB	Dan Burnett	Create [REDACTED].	0.4	\$ 175.00	\$70.00
11/11/2015	JGA	John G. Albanese	Email [REDACTED] to co-counsel.	0.1	\$ 450.00	\$45.00
11/11/2015	JGA	John G. Albanese	Email [REDACTED] to client.	0.3	\$ 450.00	\$135.00
11/11/2015	JKH	Jean K. Hibray	Review file for status of legal services and co-counsel agreements.	0.1	\$ 285.00	\$28.50
11/11/2015	JKH	Jean K. Hibray	Draft letter to client re fee split.	0.1	\$ 285.00	\$28.50
11/23/2015	JGA	John G. Albanese	Draft 26(f) report.	2	\$ 450.00	\$900.00
11/30/2015	JGA	John G. Albanese	Review Michelle Drake Edits to case management statement.	0.2	\$ 450.00	\$90.00
11/30/2015	JGA	John G. Albanese	Prepare for 26(f) conference.	0.4	\$ 450.00	\$180.00
11/30/2015	JGA	John G. Albanese	Draft discovery requests.	1	\$ 450.00	\$450.00
11/30/2015	JGA	John G. Albanese	Attend 26(f) conference.	0.4	\$ 450.00	\$180.00
11/30/2015	EMD	E. Michelle Drake	Conduct 26(f) conference	0.3	\$ 725.00	\$217.50
12/1/2015	JGA	John G. Albanese	Draft discovery requests.	1.1	\$ 450.00	\$495.00

12/1/2015	JKH	Jean K. Hibray	Draft subpoena form for Quick Search.	0.1	\$ 285.00	\$28.50
12/1/2015	EMD	E. Michelle Drake	Email John Albanese re [REDACTED].	0.2	\$ 725.00	\$145.00
12/2/2015	JGA	John G. Albanese	Read motion to stay.	0.2	\$ 450.00	\$90.00
12/2/2015	JGA	John G. Albanese	Review discovery requests.	0.2	\$ 450.00	\$90.00
12/2/2015	EMD	E. Michelle Drake	Review and revise discovery requests and subpoena to Quick Search.	1.2	\$ 725.00	\$870.00
12/2/2015	JGA	John G. Albanese	Email Michelle Drake regarding [REDACTED].	0.2	\$ 450.00	\$90.00
12/3/2015	JGA	John G. Albanese	Review email from opposing counsel regarding subpoena.	0.1	\$ 450.00	\$45.00
12/3/2015	JGA	John G. Albanese	Reveiw opposing counsel edits to 26(f) report.	0.1	\$ 450.00	\$45.00
12/3/2015	EMD	E. Michelle Drake	Email with local counsel re [REDACTED].	0.3	\$ 725.00	\$217.50
12/3/2015	JKH	Jean K. Hibray	Review Defendant's motion to stay.	0.1	\$ 285.00	\$28.50
12/3/2015	JKH	Jean K. Hibray	Finalize discovery requests, subpoena, draft service documents. Serve via email and mail. Email subpoena to process server.	1	\$ 285.00	\$285.00
12/4/2015	JGA	John G. Albanese	Draft response to motion to stay.	1.1	\$ 450.00	\$495.00
12/4/2015	EMD	E. Michelle Drake	Email to opposing counsel re will not wait on service of subpoena, availability to meet and confer.	0.2	\$ 725.00	\$145.00
12/7/2015	JGA	John G. Albanese	Draft response to motion to stay.	4	\$ 450.00	\$1,800.00
12/7/2015	EMD	E. Michelle Drake	Review [REDACTED], email JKH and JGA re [REDACTED].	0.5	\$ 725.00	\$362.50
12/7/2015	JKH	Jean K. Hibray	Prepare Model ESI Agreement.	0.1	\$ 285.00	\$28.50
12/8/2015	JGA	John G. Albanese	Edit response to motion to stay.	3.3	\$ 450.00	\$1,485.00
12/8/2015	EMD	E. Michelle Drake	Meet and confer on subpoena and potential motion to quash.	0.2	\$ 725.00	\$145.00
12/9/2015	JKH	Jean K. Hibray	Draft initial disclosures.	0.2	\$ 285.00	\$57.00
12/10/2015	JGA	John G. Albanese	Edit 26(f) report and model ESI order.	0.7	\$ 450.00	\$315.00
12/10/2015	JGA	John G. Albanese	Edit response to motion to stay.	0.7	\$ 450.00	\$315.00
12/10/2015	JGA	John G. Albanese	Read motion to quash subpoena.	0.2	\$ 450.00	\$90.00
12/10/2015	JGA	John G. Albanese	Research [REDACTED].	0.2	\$ 450.00	\$90.00
12/10/2015	JKH	Jean K. Hibray	Prepare amended subpoena, draft cover letter, email to opposing counsel and then send to process server.	0.5	\$ 285.00	\$142.50
12/10/2015	EMD	E. Michelle Drake	Review redlines, revise opposition to motion to stay.	0.7	\$ 725.00	\$507.50
12/10/2015	EMD	E. Michelle Drake	Review and revise ESI agreement to propose to opposing counsel.	0.5	\$ 725.00	\$362.50
12/10/2015	EMD	E. Michelle Drake	Review and revise 26(f) report.	0.2	\$ 725.00	\$145.00
12/11/2015	JGA	John G. Albanese	Review email from opposing counsel regarding 26(f) report.	0.1	\$ 450.00	\$45.00
12/11/2015	JGA	John G. Albanese	Emails with Michelle Drake and co-counsel regarding [REDACTED].	0.2	\$ 450.00	\$90.00
12/11/2015	JGA	John G. Albanese	Review 26(f) report.	0.2	\$ 450.00	\$90.00
12/11/2015	JGA	John G. Albanese	Email opposing counsel regarding 26(f) report.	0.1	\$ 450.00	\$45.00
12/11/2015	EMD	E. Michelle Drake	Email local counsel re thoughts on 26(f) report	0.1	\$ 725.00	\$72.50
12/14/2015	JGA	John G. Albanese	Finalize response to motion to stay.	0.6	\$ 450.00	\$270.00
12/14/2015	JGA	John G. Albanese	Finalize 26(f) report.	0.3	\$ 450.00	\$135.00
12/14/2015	JGA	John G. Albanese	Research [REDACTED].	1.2	\$ 450.00	\$540.00
12/14/2015	JKH	Jean K. Hibray	Edit opposition to motion to stay, draft declaration and prepare exhibits. Finalize, file, prepare and send judge's copies.	2	\$ 285.00	\$570.00
12/14/2015	JKH	Jean K. Hibray	Format, proof, finalize and file 26(f) report and Exhibit A.	0.5	\$ 285.00	\$142.50
12/14/2015	JKH	Jean K. Hibray	Finalize initial disclosures, draft service documents, email and mail.	0.5	\$ 285.00	\$142.50
12/14/2015	EMD	E. Michelle Drake	Review and approve declaration.	0.1	\$ 725.00	\$72.50
12/15/2015	JGA	John G. Albanese	Draft response to motion to stay discovery and quash subpoena.	4.6	\$ 450.00	\$2,070.00
12/15/2015	JGA	John G. Albanese	Review Michelle Drake's edits to motion to quash.	0.3	\$ 450.00	\$135.00
12/15/2015	JGA	John G. Albanese	Search [REDACTED] file for prior Quick Search response to a subpoena.	0.1	\$ 450.00	\$45.00
12/16/2015	JGA	John G. Albanese	Edit response to BBSI motion to quash.	0.5	\$ 450.00	\$225.00
12/16/2015	JGA	John G. Albanese	Review co-counsel's edits to motion to quash.	0.2	\$ 450.00	\$90.00
12/16/2015	JGA	John G. Albanese	Finalize response to motion to quash.	0.4	\$ 450.00	\$180.00
12/16/2015	JKH	Jean K. Hibray	Proof, format opposition to motion to quash, draft declaration and prepare exhibit. Finalize and file.	1.5	\$ 285.00	\$427.50
1/11/2016	JKH	Jean K. Hibray	Review Defendant's written discovery responses.	0.1	\$ 285.00	\$28.50
						\$28,879.50

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ClientCode	MatterCode	MatName	empinitials	empname	entrydate	LodestarRate	hrs	LodestarAmount	narrative
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/13/2016	\$725 00	0.20	\$145.00	Email client re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/14/2016	\$450 00	0.20	\$90.00	Phone call with client regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/15/2016	\$450 00	0.10	\$45.00	Read order staying case and email client.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/20/2016	\$450 00	1.10	\$495.00	Research and draft [REDACTED] letter.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/21/2016	\$450 00	0.20	\$90.00	Finalize letter regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	1/22/2016	\$285 00	0.20	\$57.00	Proof, format, finalize and send letter to opposing counsel re: preservation.
16323	00000	BBSI (DOUGHERTY)	SXX	McCollum, Sandy	2/17/2016	\$57.50	0.20	\$11.50	Create groups and add users and give permissions to access database.
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	2/17/2016	\$43.00	0.40	\$17.20	Copy/upload data to server; load data into database; code data; create new database; copy native files to server and to case directory.
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	3/14/2016	\$275 00	0.30	\$82.50	Review local rules and draft notice of address change.
16323	00000	BBSI (DOUGHERTY)	JCH	Hashmall, Joseph C	3/18/2016	\$525 00	0.20	\$105.00	Discussion of [REDACTED] with John Albanese and Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/18/2016	\$450 00	0.20	\$90.00	Discuss [REDACTED] with Joe Hashmall and Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/18/2016	\$725 00	0.20	\$145.00	Meet with JGA and JCH re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/25/2016	\$450 00	0.30	\$135.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/25/2016	\$725 00	0.30	\$217.50	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	4/4/2016	\$275 00	0.40	\$110.00	Finalize and file notice of address change. Review local rules regarding courtesy copies.
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	4/11/2016	\$275 00	0.10	\$27.50	Review case file for upcoming deadlines.
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	4/11/2016	\$275 00	0.10	\$27.50	Finalize and send client update letter.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/6/2016	\$450 00	0.10	\$45.00	Discuss [REDACTED] at case meeting.
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	5/16/2016	\$275 00	0.10	\$27.50	Update case calendar to reflect deadlines [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/18/2016	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/18/2016	\$725 00	0.10	\$72.50	Discuss [REDACTED] with John Albanese and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/3/2016	\$725.00	0.40	\$290.00	Review [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/7/2016	\$450.00	0.20	\$90.00	Email opposing counsel regarding joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/7/2016	\$450.00	0.20	\$90.00	Call with Joe Vance regarding joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/7/2016	\$450.00	0.20	\$90.00	Email with Michelle Drake regarding phone call with Joe Vance and [REDACTED].
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	6/8/2016	\$275.00	0.50	\$137.50	Draft joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/9/2016	\$450.00	0.20	\$90.00	Edit status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/9/2016	\$450.00	0.10	\$45.00	Email co-counsel regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	AK	Kittelson, Angi	6/9/2016	\$275.00	0.60	\$165.00	Review local rules and update joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/10/2016	\$450.00	0.10	\$45.00	Email Joe Vance regarding joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/13/2016	\$450.00	0.20	\$90.00	Review opposing counsel's edits to joint status report.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/13/2016	\$725.00	0.40	\$290.00	Email and meet with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/8/2016	\$450.00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/18/2016	\$450.00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/21/2016	\$450.00	0.30	\$135.00	Read and review Defendant's motion for judgment on pleading and email with co-counsel regarding briefing schedule
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/21/2016	\$725.00	0.80	\$580.00	Review defendant's motion for judgment on the pleadings; meet with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/21/2016	\$285.00	0.20	\$57.00	Review defendant's motion filing and local rules.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/26/2016	\$285.00	0.10	\$28.50	Email to client [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/28/2016	\$450.00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/28/2016	\$725.00	0.50	\$362.50	Call with client re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/28/2016	\$725.00	0.20	\$145.00	Review [REDACTED] and email re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/2/2016	\$450.00	0.30	\$135.00	Review co-counsel's draft of response to motion to dismiss
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/3/2016	\$450.00	5.10	\$2,295.00	Review, edit and draft section for response to motion to dismiss.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/3/2016	\$725.00	1.50	\$1,087.50	Review redline and revise response to motion to dismiss.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/3/2016	\$725.00	0.30	\$217.50	Email with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/4/2016	\$450.00	0.30	\$135.00	Review Michelle Drake's edits to memorandum and edit response to motion to dismiss.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/12/2016	\$450 00	0.50	\$225.00	Read and review Defendant's reply brief in support of its motion to dismiss and email with Michelle Drake regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/12/2016	\$725 00	0.50	\$362.50	Review defendant's reply brief on motion to dismiss; email with co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/15/2016	\$725 00	0.10	\$72.50	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	8/17/2016	\$275 00	0.90	\$247.50	Prepare, format, finalize notice of supplemental authority; prepare exhibit.
16323	00000	BBSI (DOUGHERTY)	HLC	Cable, Harriet L	8/18/2016	\$275 00	0.70	\$192.50	Draft notice of supplemental authority for Prindle case.

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16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/18/2016	\$725 00	0.50	\$362.50	Review [REDACTED] and email re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/20/2016	\$725 00	0.20	\$145.00	Review and respond to email from client re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/22/2016	\$450 00	0.50	\$225.00	Draft and send to co-counsel notice of supplemental authority.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/23/2016	\$450 00	0.20	\$90.00	Edit and finalize notice of supplemental authority.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/8/2016	\$725 00	0.10	\$72.50	Review [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/9/2016	\$725 00	0.10	\$72.50	Review [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/12/2016	\$450.00	0.40	\$180.00	Draft notice of supplemental authority for American Farmer and Meza.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	9/14/2016	\$275 00	0.60	\$165.00	Prepare, proof, edit notice of supplemental authority & exhibits; e-file and serve.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	9/21/2016	\$275 00	0.10	\$27.50	Upload ECF documents to iManage; calendar deadlines.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/22/2016	\$725.00	0.20	\$145.00	Meet with JCH and JGA to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/23/2016	\$725.00	0.10	\$72.50	Review redline and approve client update letter.
16323	00000	BBSI (DOUGHERTY)	RXG	Gebo, Rachel X	9/26/2016	\$250 00	0.30	\$75.00	Mail and email client update letter.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	9/29/2016	\$275 00	0.20	\$55.00	Upload ECF documents to iManage; calendar court deadlines.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/4/2016	\$450 00	0.20	\$90.00	Pull briefing for oral argument and read email from Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/4/2016	\$725 00	0.80	\$580.00	Call with counsel on [REDACTED]; email with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	10/5/2016	\$275 00	0.30	\$82.50	Review upcoming deadlines and [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/7/2016	\$450 00	0.20	\$90.00	Draft notice of supplemental authority for Moody v. Ascenda.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	10/10/2016	\$275 00	0.50	\$137.50	Prepare, edit, finalize plaintiff's third notice of supplemental authority; serve and file.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/10/2016	\$450 00	0.50	\$225.00	Call with Elizabeth Ryan, Michelle Drake, and Beth Terrell regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/10/2016	\$725 00	0.60	\$435.00	Call with [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/10/2016	\$725 00	0.30	\$217.50	Email paralegal re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	10/11/2016	\$275 00	2.70	\$742.50	Prepare and finalize case documents to be used at oral argument on 10-13-16; research and upload pleadings from [REDACTED]; upload pleadings from [REDACTED]; submit all to attorney for review.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/11/2016	\$450 00	0.30	\$135.00	Discuss pro hac vice application [REDACTED] and draft pro hac application.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/12/2016	\$725 00	6.00	\$4,350.00	Travel to Seattle for oral argument; review all briefs, pleadings, and outline oral argument for hearing tomorrow.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/12/2016	\$725 00	0.20	\$145.00	Emails re pro hac vice filing.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	10/13/2016	\$275 00	0.30	\$82.50	Upload ECF documents to iManage; calendar court deadlines.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/13/2016	\$450 00	0.20	\$90.00	Call with Michelle Drake on [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/13/2016	\$725 00	3.00	\$2,175.00	Prepare for oral argument; finish reviewing all materials [REDACTED], email [REDACTED] lawyers
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/13/2016	\$725 00	2.00	\$1,450.00	Argue at hearing on motion to dismiss.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/13/2016	\$725 00	1.00	\$725.00	Call with co-counsel [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/13/2016	\$725 00	5.50	\$3,987.50	Travel back to Minneapolis from Seattle.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/14/2016	\$725 00	0.10	\$72.50	Meet with JCH and JGA to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/17/2016	\$725 00	0.10	\$72.50	Call with Public Justice re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/26/2016	\$450.00	0.20	\$90.00	Prepare notice of supplemental authority for Graham v. Pyramid.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/26/2016	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/26/2016	\$725 00	0.10	\$72.50	Meet to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/27/2016	\$725 00	0.10	\$72.50	Email re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/28/2016	\$450 00	0.40	\$180.00	Prepare and file notice of supplemental authority (Graham).
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/31/2016	\$450 00	1.40	\$630.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	10/31/2016	\$275 00	0.40	\$110.00	Review local rules, judge's orders, ECF rules to determine if Judge requires courtesy copies of e-filed notice of supplemental authority.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	11/1/2016	\$275 00	0.10	\$27.50	Upload ECF documents to iManage; review pleadings for court deadlines.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/1/2016	\$450 00	1.00	\$450.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	11/9/2016	\$275 00	0.10	\$27.50	Review and coordinate [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	11/10/2016	\$275 00	0.20	\$55.00	Upload ECF documents to iManage; calendar court deadlines.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/10/2016	\$725 00	0.20	\$145.00	Review order on motion for judgment on the pleadings.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/14/2016	\$450 00	0.20	\$90.00	Review order on motion to dismiss and email client.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/15/2016	\$725 00	1.20	\$870.00	Review status of case prior to stay review old status report and the parties positions on case scheduling. Email local counsel re [REDACTED] and review [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/16/2016	\$450 00	1.10	\$495.00	Review draft protective order and draft 26(f) report.

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16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/17/2016	\$450 00	0.60	\$270.00	Watch oral argument in [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/18/2016	\$450 00	0.20	\$90.00	Email with Michelle Drake regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/18/2016	\$725 00	0.60	\$435.00	Draft case status report and email to opposing counsel.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/18/2016	\$725 00	0.50	\$362.50	Call with opposing counsel re scheduling order and next steps in litigation.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/22/2016	\$450 00	0.00	\$0.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/22/2016	\$725 00	0.10	\$72.50	Meet with JCH and JGA on [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	11/29/2016	\$275 00	1.50	\$412.50	Prepare, edit, finalize joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/29/2016	\$450 00	0.30	\$135.00	Attend further 26(f) with opposing counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/29/2016	\$450 00	0.30	\$135.00	Review opposing counsel's edits to 26(f) report and email with Michelle Drake regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/29/2016	\$725 00	0.80	\$580.00	Review redline and revise defendant's changes to status report and proposed ESI agreement.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/29/2016	\$725 00	0.40	\$290.00	Call with opposing counsel re ESI order and status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/30/2016	\$450 00	0.40	\$180.00	Read and review Defendant's motion for interlocutory appeal and research [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/30/2016	\$285 00	0.80	\$228.00	Proof, format, finalize and file Joint Status Report and Stipulated Protective Order.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	12/1/2016	\$275 00	1.20	\$330.00	Research local rules to determine whether EMD is required to file Notice of Unavailability [REDACTED]; telephone calls to Judge Zilly's judicial assistant to determine Judge's preference; prepare, edit and finalize notice of unavailability for EMD; download ECF documents to iManage; review pleadings for court deadlines.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	12/1/2016	\$275 00	0.40	\$110.00	Upload ECF documents to iManage; review local rules and judge's orders; calendar court deadlines.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/6/2016	\$450 00	2.10	\$945.00	Draft response to motion for 1292(b) certification.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/7/2016	\$450 00	2.20	\$990.00	Draft and edit response to motion for interlocutory appeal.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	12/8/2016	\$275 00	0.70	\$192.50	Prepare and edit plaintiff's response to defendant's 1292(b) motion.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/8/2016	\$450 00	2.40	\$1,080.00	Draft and edit response to motion for interlocutory appeal.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	12/8/2016	\$275 00	0.30	\$82.50	Finalize plaintiff's response to defendant's 1292(b) motion.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/12/2016	\$450 00	0.50	\$225.00	Review and finalize response to motion to stay.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/12/2016	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	12/12/2016	\$275 00	2.70	\$742.50	Prepare, edit, cite-check, finalize plaintiff's opposition to defendant's 1292(b) motion; declaration and exhibits; e-file.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/12/2016	\$725 00	0.10	\$72.50	Meet with JCH and JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/13/2016	\$725 00	0.50	\$362.50	Review [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/14/2016	\$725 00	0.10	\$72.50	Review [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/16/2016	\$450 00	0.30	\$135.00	Read and review Defendant's reply brief on motion to stay.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/16/2016	\$725 00	0.50	\$362.50	Review defendant's reply to motion for appeal and stay; email JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/20/2016	\$450 00	0.10	\$45.00	Review order from court denying motion for interlocutory appeal.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/20/2016	\$450 00	0.40	\$180.00	Review discovery issued in case.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	12/20/2016	\$275 00	0.50	\$137.50	Upload ECF documents to iManage; calendar court deadlines.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/20/2016	\$725 00	0.30	\$217.50	Review meet and confer letter.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/28/2016	\$285 00	0.30	\$85.50	Format, edit and finalize meet and confer letter, send same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/28/2016	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/28/2016	\$450 00	0.50	\$225.00	Draft letter to opposing counsel regarding discovery dispute.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/28/2016	\$725 00	0.20	\$145.00	Meet with litigation team to discuss [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/28/2016	\$725 00	0.40	\$290.00	Review redline and revise discovery letter to opposing counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/3/2017	\$450 00	0.10	\$45.00	Email client regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/4/2017	\$450 00	0.10	\$45.00	Email with opposing counsel regarding meet and confer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/10/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/10/2017	\$450 00	0.30	\$135.00	Meet and confer call regarding discovery issues with Megan Starich and Joe Vance.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/10/2017	\$725 00	0.50	\$362.50	Call with opposing counsel re discovery issues
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/10/2017	\$725 00	0.20	\$145.00	Meet with JCH, JGA and litigation team re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/18/2017	\$725 00	0.20	\$145.00	Review and revise [REDACTED] letter to client.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/19/2017	\$450 00	0.20	\$90.00	Review defendant's revised discovery responses.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	1/20/2017	\$285 00	0.20	\$57.00	Review docs received on flash drive, submit to Kaleidoscope.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/20/2017	\$725 00	0.30	\$217.50	Review [REDACTED] and email re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/20/2017	\$725 00	0.30	\$217.50	Review [REDACTED]
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	1/25/2017	\$43.00	0.40	\$17.20	Copy/upload data to the server; load data into the database; code data.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/27/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] y with Michelle Drake and Joe Hashmall.

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16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/27/2017	\$725 00	0.20	\$145.00	Meet with JCH and JGA and litigation team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/3/2017	\$450 00	0.50	\$225.00	Review defendant's document production.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/7/2017	\$450 00	0.80	\$360.00	Review defendant's discovery responses and draft letter regarding deficiencies.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/9/2017	\$450 00	0.30	\$135.00	Edit draft letter to opposing counsel regarding discovery.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/9/2017	\$285 00	0.30	\$85.50	Edit, format, send letter to opposing counsel re discovery.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/10/2017	\$450 00	0.10	\$45.00	Respond to opposing counsel's email regarding meet and confer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/13/2017	\$450 00	0.10	\$45.00	Email opposing counsel regarding scheduling meet and confer.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/14/2017	\$285 00	0.30	\$85.50	Discuss [REDACTED] with JGA.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/14/2017	\$285 00	2.00	\$570.00	Begin conducting legal research re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/15/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/15/2017	\$285 00	1.00	\$285.00	Read cases for [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/15/2017	\$285 00	3.00	\$855.00	Draft motion to compel.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/15/2017	\$725 00	0.10	\$72.50	Meet with team and discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/21/2017	\$285 00	1.80	\$513.00	Review produced docs and discovery responses for consumer reporting agency listings. Conduct online research [REDACTED]. Email attorney about [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/22/2017	\$450 00	0.30	\$135.00	Meet and confer phone call with opposing counsel regarding scope of discovery.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/22/2017	\$450 00	2.70	\$1,215.00	Edit and revise motion to compel class discovery.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/23/2017	\$285 00	0.20	\$57.00	Review attorney's notes from meet and confer and review of motion to compel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	2/23/2017	\$285 00	0.30	\$85.50	Review motion rules, email re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/28/2017	\$725 00	0.30	\$217.50	Review and respond to email from JKH [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/6/2017	\$725 00	0.20	\$145.00	Call email and text client.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	3/7/2017	\$285.00	0.10	\$28.50	Review briefing schedule stipulation.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	3/8/2017	\$285.00	0.20	\$57.00	Review order setting motion to compel dates
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/10/2017	\$725.00	0.10	\$72.50	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/20/2017	\$450.00	0.50	\$225.00	Read and review [REDACTED] and discuss [REDACTED] with Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/21/2017	\$450.00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/21/2017	\$725.00	0.10	\$72.50	Meet with entire team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/29/2017	\$725.00	4.50	\$3,262.50	Review redline and revise motion to compel.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/29/2017	\$725.00	0.30	\$217.50	Email JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	3/30/2017	\$275.00	1.30	\$357.50	Prepare motion to compel and exhibits for e-filing; e-file; send courtesy copies to judge; send Word version of proposed order to Court.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	3/30/2017	\$285 00	0.80	\$228.00	Discuss [REDACTED], review rules/procedures, draft email re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	3/30/2017	\$285 00	2.00	\$570.00	Proof, format motion to compel, draft declaration, prepare exhibits.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/30/2017	\$450 00	2.60	\$1,170.00	Review and edit motion to compel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/30/2017	\$450 00	0.40	\$180.00	Discuss [REDACTED] with Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	3/30/2017	\$285 00	0.80	\$228.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/30/2017	\$725 00	1.10	\$797.50	Review redline and revise motion to compel and exhibits.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/30/2017	\$725 00	0.30	\$217.50	Review JGA final revisions to memo.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	3/31/2017	\$275 00	0.30	\$82.50	Download ECF documents to iManage; review pleadings for court deadlines.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	3/31/2017	\$285 00	0.60	\$171.00	Review defendant's motion for protective order, compare declaration versions, email attorney.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/3/2017	\$725 00	0.10	\$72.50	Review [REDACTED] and discuss [REDACTED] with JCH and JGA.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/4/2017	\$725.00	0.40	\$290.00	Call with co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/4/2017	\$450.00	0.30	\$135.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	4/5/2017	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server; [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/5/2017	\$450.00	0.80	\$360.00	Read and review Beth Terrell's research regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/6/2017	\$450.00	1.50	\$675.00	Draft notice regarding [REDACTED] and discuss with Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/7/2017	\$450.00	1.20	\$540.00	Draft, edit, and send letter to opposing counsel regarding response documents produced and response to subpoena in BBSI.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/7/2017	\$450.00	0.30	\$135.00	Discuss [REDACTED] with Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	4/7/2017	\$285.00	0.50	\$142.50	Proof, finalize, file notice re Syed.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/12/2017	\$450.00	0.20	\$90.00	Phone call with Bill Mandia regarding [REDACTED].

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16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/12/2017	\$450.00	2.50	\$1,125.00	Research and draft response to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/12/2017	\$450.00	1.10	\$495.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/13/2017	\$450.00	0.40	\$180.00	Phone call with opposing counsel and email to Michelle Drake regarding same.
16323	00000	BBSI (DOUGHERTY)	AXA	Albanese, Anthony	4/13/2017	\$175.00	4.00	\$700.00	Assessed and described [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/14/2017	\$450.00	3.90	\$1,755.00	Research [REDACTED] and email Michelle Drake regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/17/2017	\$450.00	0.20	\$90.00	Email with Michelle Drake regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/17/2017	\$450.00	0.20	\$90.00	Read emails regarding privilege issues from Joe Vance and Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/17/2017	\$450.00	3.30	\$1,485.00	Research Draft motion for order on privileged documents.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/17/2017	\$725.00	0.20	\$145.00	Email with opposing counsel re need to reschedule discovery meet and confer.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/17/2017	\$725.00	0.30	\$217.50	Email with JGA re approach to raising [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/17/2017	\$725.00	0.50	\$362.50	Meet with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/18/2017	\$450.00	0.10	\$45.00	Discuss [REDACTED] with Joe Hashmall and Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/18/2017	\$450.00	5.10	\$2,295.00	Draft motion for privilege determination.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/18/2017	\$725.00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/19/2017	\$450.00	2.20	\$990.00	Draft and edit motion regarding privilege.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/19/2017	\$450.00	3.20	\$1,440.00	Draft response to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/19/2017	\$450.00	2.00	\$900.00	Edit draft motion for order on privilege issues.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	4/19/2017	\$285.00	1.00	\$285.00	Review court procedures and rules on filing under seal, draft motion and proposed order; discussions and edits re same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	4/19/2017	\$285.00	1.50	\$427.50	Proof, format motion for privilege, draft supporting declaration, discussions re same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/19/2017	\$725.00	1.50	\$1,087.50	Review redline and revise brief on privilege issues; email to co-counsel for input.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/20/2017	\$450.00	3.10	\$1,395.00	Review edit and finalize motion for privilege determination.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/20/2017	\$450.00	3.10	\$1,395.00	Draft response to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/20/2017	\$450.00	0.20	\$90.00	Phone call with opposing counsel regarding use of BBSI form.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	4/20/2017	\$285.00	2.70	\$769.50	Proof motion re privilege, declaration, prepare exhibits. Proof motion to seal, proposed orders. Prepare redacted and unredacted documents. Edits to all filings, discussions with attorney. Finalize, file motion re privilege and motion to seal and sealed docs. Email to opposing counsel re same. Prepare and send judge's copies.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/20/2017	\$725.00	0.30	\$217.50	Review co-counsel's edits to motion on privilege.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/20/2017	\$725.00	0.30	\$217.50	Call with opposing counsel on motion to compel; review stipulation for extension of briefing schedule.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/20/2017	\$725.00	0.30	\$217.50	Call with opposing counsel re privilege motion, motion to compel, and his request for extended briefing schedule.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/21/2017	\$450.00	0.30	\$135.00	Edit response to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/21/2017	\$450.00	0.10	\$45.00	Review ECF entry extending deadline to respond to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/25/2017	\$450.00	1.70	\$765.00	Edit response to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/25/2017	\$725.00	1.40	\$1,015.00	Review redline and revise draft motion to compel/response to motion for protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/26/2017	\$450.00	0.90	\$405.00	Edit response to protective order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/26/2017	\$450.00	0.20	\$90.00	Discuss [REDACTED] with Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/27/2017	\$450.00	0.60	\$270.00	Review edits to response to motion for protective order and finalize.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	4/28/2017	\$285.00	2.00	\$570.00	Proof, format response to motion for protective order, draft declaration, discussions with attorney re: same. Finalize, file.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/28/2017	\$725.00	0.30	\$217.50	Review redline and revise my declaration in support of our memorandum.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/1/2017	\$450.00	0.30	\$135.00	Read and review defendant's response to motion for order on privilege.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/1/2017	\$450.00	0.30	\$135.00	Read and review response to motion to compel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/1/2017	\$285.00	0.20	\$57.00	Download and review defendant's response to motion for privilege.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/2/2017	\$450.00	2.30	\$1,035.00	Research and draft reply to motion for order on privilege.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/2/2017	\$450.00	1.60	\$720.00	Research and draft reply brief on privilege motion.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/2/2017	\$285.00	0.50	\$142.50	Draft joint motion to extend deadlines, review rules on same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/2/2017	\$725.00	0.20	\$145.00	Review redline and revise stip on extension.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/3/2017	\$450.00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/3/2017	\$450.00	3.10	\$1,395.00	Draft reply brief regarding privilege.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/3/2017	\$725.00	0.10	\$72.50	Team meeting on [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/4/2017	\$450.00	0.60	\$270.00	Edit reply brief to privilege motion.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/4/2017	\$450.00	1.40	\$630.00	Edit reply brief to privilege motion.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/4/2017	\$285.00	0.30	\$85.50	Finalize and file stipulated motion to extend schedule.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/4/2017	\$285.00	0.30	\$85.50	Draft motion to seal and proposed order.

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16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/4/2017	\$285 00	0.10	\$28.50	Review order on schedule.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/4/2017	\$285 00	1.00	\$285.00	Proof reply in support of motion re privilege, set up redacted and unredacted versions, discuss with John Albanese.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/4/2017	\$725 00	0.60	\$435.00	Review redline and revise motion on privilege.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/5/2017	\$450.00	0.20	\$90.00	Finalize reply brief on motion to determine privilege.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/5/2017	\$285.00	0.20	\$57.00	Email instructions for filing, call re: same.
16323	00000	BBSI (DOUGHERTY)	JE	Ebensperger, Jean	5/5/2017	\$275 00	1.70	\$467.50	Prepare Plaintiff's motions to file under seal and motion to determine privilege; e-file and serve; send Word version of proposed order to judge; send unredacted version of motion to opposing counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/11/2017	\$450 00	0.30	\$135.00	Read and review discovery requests sent by opposing counsel and email Jean Hibray regarding same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/12/2017	\$285 00	0.30	\$85.50	Review requests to plaintiff received.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/16/2017	\$285 00	1.00	\$285.00	Draft plaintiff's objections and responses to request for production.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/17/2017	\$285 00	0.20	\$57.00	Gather 70 docs to transfer into this case's Kaleidoscope database.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/17/2017	\$285 00	2.00	\$570.00	Draft objections and responses to interrogatories and request for admissions.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/17/2017	\$285 00	1.00	\$285.00	Compare Kaleidoscope databases for this case and Quick Search to determine what is missing in this case.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/18/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/18/2017	\$285 00	0.10	\$28.50	Discuss production ticket with DTI.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/18/2017	\$725 00	0.10	\$72.50	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/19/2017	\$450 00	0.20	\$90.00	Read and review court's order regarding discovery.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/19/2017	\$450 00	0.20	\$90.00	Phone call with client regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/19/2017	\$450 00	0.20	\$90.00	Meet with Jean Hibray and Michelle Drake regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/19/2017	\$285 00	1.00	\$285.00	Review order on discovery motions, calendaring [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/19/2017	\$285 00	0.30	\$85.50	Meet with attorneys re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/19/2017	\$725 00	0.20	\$145.00	Reach out to client re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/19/2017	\$725 00	0.50	\$362.50	Meet with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/22/2017	\$450 00	1.10	\$495.00	Review and code documents for production.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/22/2017	\$450 00	0.90	\$405.00	Review and edit Plaintiff's discovery responses.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/22/2017	\$285 00	0.30	\$85.50	Prep discovery responses for client meeting
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/23/2017	\$450 00	0.70	\$315.00	Review and code documents for production.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/24/2017	\$450 00	0.50	\$225.00	Review and code documents for production.
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	5/25/2017	\$43.00	0.40	\$17.20	Identify the documents [REDACTED]; backup the files and coding data if needed; [REDACTED] [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/25/2017	\$725 00	0.50	\$362.50	Meet with client.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/25/2017	\$285 00	0.80	\$228.00	Emails re: [REDACTED], draft cover letter, send flash drive back to defendant.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/25/2017	\$725 00	1.50	\$1,087.50	Drive to/from Pottstown for client meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/25/2017	\$450 00	0.20	\$90.00	Email Joe Vance regarding document destruction and 30(b)(6).
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/26/2017	\$450 00	0.30	\$135.00	Read [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/26/2017	\$450 00	0.30	\$135.00	Email with Michelle Drake regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	5/26/2017	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED] [REDACTED] [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/26/2017	\$725 00	0.50	\$362.50	Call with opposing counsel re: request for stay and potential remand motion; email JGA re same, and proposed response.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/30/2017	\$450 00	0.20	\$90.00	Review and edit 30(b)(6) notice.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/31/2017	\$450 00	0.10	\$45.00	Email Jean Hibray regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/31/2017	\$285 00	0.30	\$85.50	Draft cover letter and prepare FedEx packets for client to send docs.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/31/2017	\$285 00	0.10	\$28.50	Edit 30(b)(6) notice.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/31/2017	\$725 00	0.30	\$217.50	Email client with [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/1/2017	\$450 00	0.30	\$135.00	Read and review Defendant's motion to stay and discuss with Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/1/2017	\$285 00	1.00	\$285.00	Review [REDACTED], prepare [REDACTED], [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/1/2017	\$285 00	0.30	\$85.50	Emails re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/1/2017	\$725 00	0.50	\$362.50	Review motion for remand/dismissal/stay filed by opposing counsel; meet with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/2/2017	\$450 00	0.20	\$90.00	Send 30(b)(6) notice to opposing counsel.

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16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/2/2017	\$285 00	0.50	\$142.50	Review defendant's motion, check [REDACTED], discuss with attorney.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/2/2017	\$285 00	0.20	\$57.00	Serve 30(b)(6) notice, emails re same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/5/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/5/2017	\$450 00	0.50	\$225.00	Draft stipulation on motion to remand.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/5/2017	\$450 00	1.10	\$495.00	Draft response to motion to extend.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/5/2017	\$450 00	0.20	\$90.00	Email with opposing counsel regarding stipulation to remand.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/5/2017	\$725 00	0.30	\$217.50	Review email from opposing counsel re discovery stay in state court.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/5/2017	\$285.00	0.30	\$85.50	Draft paragraph for response to motion re: local rule issues, dates.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/5/2017	\$285.00	0.50	\$142.50	Redact [REDACTED], submit [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/5/2017	\$725.00	0.10	\$72.50	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/6/2017	\$450.00	0.10	\$45.00	Review opposing counsel's edits to motion for remand.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/7/2017	\$450.00	0.50	\$225.00	Edit and finalize response to motion to stay.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/7/2017	\$285.00	1.50	\$427.50	Proof, format stipulated motion and proposed order. Proof, format response to motion. Finalize all filings, file same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/7/2017	\$285.00	0.10	\$28.50	Finalize production folder, email with Kaleidoscope.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/7/2017	\$725.00	0.50	\$362.50	Review redline and revise response to motion for stay, final review of stip for remand.
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	6/7/2017	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/7/2017	\$725 00	0.50	\$362.50	Review redline and revise response to motion to stay.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/8/2017	\$285 00	0.30	\$85.50	Prepare and serve 2nd amended notice of taking deposition.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/9/2017	\$450 00	0.40	\$180.00	Review and revise responses to discovery.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/12/2017	\$450 00	1.20	\$540.00	Review and finalize discovery responses.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/12/2017	\$285 00	1.20	\$342.00	Prep written responses and production (including Quick Search docs), finalize and serve on opposing counsel
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/12/2017	\$725 00	0.20	\$145.00	Review remand order; email JGA re same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/12/2017	\$285 00	0.10	\$28.50	Emails re: discovery responses.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/13/2017	\$450 00	1.30	\$585.00	Review [REDACTED]s and edit discovery requests.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/13/2017	\$285 00	1.80	\$513.00	Review [REDACTED]. Review pro hac procedures. Draft pro hac papers.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/13/2017	\$285 00	0.80	\$228.00	Edit discovery requests [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/14/2017	\$285 00	0.70	\$199.50	Check dockets, finalize pro hacs, proof disc reqs, emails re same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/26/2017	\$450 00	0.10	\$45.00	Edit discovery and review order from court.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/26/2017	\$285 00	0.30	\$85.50	Review [REDACTED]s, review [REDACTED], email attys re: [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/26/2017	\$285 00	0.20	\$57.00	Finalize requests, email local counsel to sign and return.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/27/2017	\$450 00	0.30	\$135.00	Review BBSI's motion to transfer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/27/2017	\$450 00	1.00	\$450.00	Research for response to BBSI's motion to transfer.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/27/2017	\$285 00	0.20	\$57.00	Review filed pro hacs from local counsel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/27/2017	\$285 00	0.70	\$199.50	Review rules re discovery service, serve requests via email and mail.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/28/2017	\$450 00	3.60	\$1,620.00	Research [REDACTED]r and email co-counsel regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/28/2017	\$725 00	0.50	\$362.50	Review motion to transfer venue and [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/28/2017	\$450 00	0.20	\$90.00	Email opposing counsel regarding briefing schedule.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/28/2017	\$285 00	0.10	\$28.50	Check [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/28/2017	\$285 00	0.60	\$171.00	Review defendant's motion to change venue, review local rules, calendar applicable dates.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/28/2017	\$285 00	0.70	\$199.50	Review [REDACTED], prepare response template for motion to change venue.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/29/2017	\$450 00	0.90	\$405.00	Draft response to motion to transfer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/29/2017	\$450 00	0.10	\$45.00	Respond to email from opposing counsel regarding briefing schedule.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/30/2017	\$450 00	0.00	\$0.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/30/2017	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	6/30/2017	\$285 00	0.20	\$57.00	Review emails re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/5/2017	\$450 00	1.90	\$855.00	Research and draft response to motion to transfer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/6/2017	\$450 00	6.00	\$2,700.00	Draft response to motion to transfer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/13/2017	\$450 00	0.50	\$225.00	Review Michelle Drake's edits to response to motion to transfer and email co-counsel regarding same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/18/2017	\$450 00	0.30	\$135.00	Review and edit response to motion to transfer and email co-counsel regarding same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/19/2017	\$285 00	0.10	\$28.50	Review response filings from local counsel.

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16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/19/2017	\$285 00	0.20	\$57.00	State court ECF registration for attorneys.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/19/2017	\$285 00	0.10	\$28.50	Finalize and email/mail update letter to client.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/19/2017	\$285 00	0.20	\$57.00	Review orders on pro hacs.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/24/2017	\$285 00	0.20	\$57.00	Review defendant's reply in support of venue change.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/25/2017	\$450 00	0.30	\$135.00	Read and review reply brief filed in support of motion to transfer.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	7/26/2017	\$285 00	0.10	\$28.50	Check state court docket.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/26/2017	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/26/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/28/2017	\$450 00	0.20	\$90.00	Respond to opposing counsel and email co-counsel on request for discovery extension.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/3/2017	\$725 00	0.40	\$290.00	Review order on motion to transfer; email with co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/4/2017	\$450 00	0.30	\$135.00	Review order granting motion to transfer and email co-counsel regarding same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	8/15/2017	\$285 00	0.80	\$228.00	Review state court clerk's letter re: required fees, read referenced statutes, email attorneys re: bl [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/16/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/16/2017	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/21/2017	\$450 00	0.20	\$90.00	Review discovery responses and email co-counsel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	8/22/2017	\$285 00	0.20	\$57.00	Review defendant's discovery responses.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/22/2017	\$450 00	0.10	\$45.00	Email with opposing counsel regarding meet and confer.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	8/23/2017	\$285 00	0.10	\$28.50	Review clerk's letter sending docs to Clark County.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	8/30/2017	\$285 00	0.20	\$57.00	Check [REDACTED], email attorneys re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/1/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake and Joe Hashmall.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/1/2017	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/5/2017	\$450 00	0.20	\$90.00	Meet and confer phone call with Megan Starich and Michelle Drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/6/2017	\$450 00	0.10	\$45.00	Email opposing counsel regarding briefing schedule.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	9/8/2017	\$285 00	0.30	\$85.50	Review letter from clerk re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/11/2017	\$450 00	0.30	\$135.00	Email with opposing counsel and Michelle Drake regarding hearing date.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	9/12/2017	\$285 00	0.50	\$142.50	Review case management rules, pull and prepare form.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/12/2017	\$450 00	0.30	\$135.00	Review [REDACTED] and email co-counsel regarding same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/18/2017	\$450 00	0.10	\$45.00	Follow up with co-counsel regarding scheduling conference.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/28/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with Michelle Drake, Joe Hashmall, and Jean Hibray.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/28/2017	\$725 00	0.10	\$72.50	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	9/28/2017	\$285 00	0.80	\$228.00	Research [REDACTED], call judge's clerk, email attorney re: [REDACTED] Call WSBA re: pro hac question, email attorney re: [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	9/29/2017	\$285 00	0.60	\$171.00	Draft pro hac vice motions; email attorney.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	9/29/2017	\$285 00	0.20	\$57.00	Draft citation for motion to compel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	10/4/2017	\$285 00	0.60	\$171.00	Draft additional language for pro hacs, email re: same. Finalize pro hacs (2), citation for MTC, email to local counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/13/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	10/13/2017	\$285 00	0.20	\$57.00	Email with local counsel re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/13/2017	\$725 00	0.10	\$72.50	Team meeting to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/27/2017	\$450 00	0.10	\$45.00	Email Bradford Kinsey regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/1/2017	\$450 00	0.90	\$405.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/1/2017	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/1/2017	\$450 00	0.20	\$90.00	Email opposing counsel regarding motion to compel.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/1/2017	\$250 00	1.00	\$250.00	Prepare Motion to Compel outline. Review court rules and local rules for the Superior Court of Washington, Clark County.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/1/2017	\$450 00	0.10	\$45.00	Email co-counsel regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/1/2017	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/2/2017	\$250 00	0.50	\$125.00	Email to JGA re [REDACTED]. Discuss [REDACTED] with Jean. Email to JGA re the same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/7/2017	\$450 00	0.10	\$45.00	Email opposing counsel regarding motion to compel and read response.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/7/2017	\$450 00	0.50	\$225.00	Draft motion to compel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/8/2017	\$450 00	4.50	\$2,025.00	Research and draft motion to compel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/9/2017	\$450 00	2.60	\$1,170.00	Review and edit motion to compel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/9/2017	\$285 00	1.00	\$285.00	Draft affidavit and proposed order for motion to compel, compile exhibits (12).
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/10/2017	\$725 00	1.00	\$725.00	Review redline and revise draft motion to compel.

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16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/13/2017	\$450 00	1.90	\$855.00	Review, edit and finalize motion to compel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/13/2017	\$285 00	1.00	\$285.00	Edit, format, pull new exhibit for affidavit, finalize and email motion to compel papers.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/13/2017	\$285 00	0.20	\$57.00	Check Clark County rules, Washington rules re: motions.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/13/2017	\$450 00	0.30	\$135.00	Read and review defendant's motion on standing.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/14/2017	\$285 00	0.40	\$114.00	Review the filings both parties submitted, organize for file, emails re: [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/14/2017	\$285 00	2.00	\$570.00	Discuss [REDACTED] with attorney, read defendant's motion for summary judgment, prepare first draft of response.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/20/2017	\$450 00	1.60	\$720.00	Draft response to summary judgment motion.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/20/2017	\$450 00	5.50	\$2,475.00	Research and draft response to summary judgment motion.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/20/2017	\$285 00	0.20	\$57.00	Discuss [REDACTED] with attorney, find [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/21/2017	\$450 00	4.20	\$1,890.00	Draft, edit and revise motion for summary judgment.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/27/2017	\$450 00	1.20	\$540.00	Review Michelle Drake edits to settlement to response to summary judgment.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/27/2017	\$725 00	0.10	\$72.50	Meet with team and discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/27/2017	\$725 00	1.50	\$1,087.50	Review redline and revise opposition to summary judgment.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/28/2017	\$450 00	0.50	\$225.00	Finalize response to motion for summary judgment.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/28/2017	\$285 00	2.00	\$570.00	Proof opposition to summary judgment; draft affidavit, exhibit list. Compile final versions & prepare exhibits. Email to local counsel for filing.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	11/30/2017	\$285 00	0.30	\$85.50	Review correspondence re: cross-briefing agreements, discuss with EMD; email with local counsel re: same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/30/2017	\$725 00	0.30	\$217.50	Review briefing schedule and meet with JKH and email with opposing counsel re same.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/1/2017	\$285 00	0.20	\$57.00	Download and review filed cross briefing from yesterday; email Jen Murray re: [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/4/2017	\$250.00	0.10	\$25.00	Review emails between Jean and co-counsel re [REDACTED]. Discuss the same with Jean.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/4/2017	\$285 00	0.10	\$28.50	Email local counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/6/2017	\$285.00	0.40	\$114.00	Proof reply in support of motion to compel.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/6/2017	\$285.00	0.30	\$85.50	Retrieve admission order from third party docket vendor, emails with local counsel re: [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/6/2017	\$725.00	0.70	\$507.50	Review redline and revise reply brief.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/7/2017	\$285.00	0.20	\$57.00	Review summary judgment & motion to compel replies.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	12/7/2017	\$285.00	0.20	\$57.00	Draft amended citation for motion to compel, email local counsel.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/7/2017	\$725.00	0.30	\$217.50	Call re need to reschedule hearing; follow up email to opposing counsel.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/18/2017	\$725 00	0.10	\$72.50	Meet with team and discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/20/2017	\$450.00	0.40	\$180.00	Draft notice of supplemental authority.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/5/2018	\$725.00	0.10	\$72.50	Meet with team and discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/5/2018	\$450.00	0.10	\$45.00	Meet with litigation team regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/10/2018	\$250.00	0.40	\$100.00	Review docket and pleadings. Review local rules for information on requesting to appear at scheduling conference by phone. Emails with EMD and JGA re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/11/2018	\$250 00	0.30	\$75.00	Emails with EMD and JGA re request to appear at scheduling conference by phone. Leave voicemail message with Judge Vanderwood's clerk re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/12/2018	\$250 00	0.30	\$75.00	Phone conference with Judge Vanderwood's clerk re appearing by phone at scheduling conference. Email to JGA and EMD re same. Calendar reminder.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/24/2018	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/24/2018	\$725 00	0.10	\$72.50	Meet with team and discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/29/2018	\$450 00	0.50	\$225.00	Draft joint status report and read local rules [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/29/2018	\$250.00	0.20	\$50.00	Email to JGA re joint status report. Review emails between JGA and counsel re joint status report and jury demand.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/30/2018	\$250.00	0.20	\$50.00	Review emails between JGA and Joe Vance re contacting Court, and [REDACTED]. Review email from JGA re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/31/2018	\$250.00	0.60	\$150.00	Review local rules. Prepare jury demand and work on joint status report. Review emails between counsel and Judge's clerk re notice of rescheduling of scheduling conference. Emails with Jean and JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/31/2018	\$450.00	0.20	\$90.00	Email with Joe Vance and Michelle Drake regarding scheduling conference.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/1/2018	\$450.00	0.20	\$90.00	Review notice of scheduling hearing with court.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/1/2018	\$250.00	0.50	\$125.00	Review emails between JGA and opposing counsel re rescheduling scheduling conference. Prepare Amended Notice. Emails with JGA re same. Review email from JGA to Beth re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/2/2018	\$250.00	0.30	\$75.00	Review email from Beth's office re [REDACTED]. Update calendar.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/6/2018	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/6/2018	\$725 00	0.10	\$72.50	Meet with team and discuss [REDACTED].

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16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/7/2018	\$250.00	0.50	\$125.00	Review email from EMD re notice of supplemental authority. Save updated version for file. Finalize notice of supplemental authority. Emails with JGA re same. Emails with Beth and Jen re filing same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/8/2018	\$250.00	0.10	\$25.00	Review and save e-filed notice of supplemental authority from co-counsel's office.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/20/2018	\$250.00	0.40	\$100.00	Review deadline to confirm oral argument and discuss with JGA. Review emails between JGA and opposing counsel re same. Email to EMD re binder for hearing.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/21/2018	\$250.00	1.20	\$300.00	Assemble docs/binder for EMD in preparation of motion hearings. Search for all cases cited in briefs on WestLaw.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/21/2018	\$450.00	0.10	\$45.00	Discuss case with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/22/2018	\$250.00	0.60	\$150.00	Search for [REDACTED]. Email to EMD re same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/22/2018	\$725.00	1.50	\$1,087.50	Begin preparation for hearing; initial review of briefs.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/23/2018	\$450.00	0.30	\$135.00	Emails with Michelle Drake regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/23/2018	\$725.00	4.50	\$3,262.50	Travel to PDX for hearing; review all briefs and cases cited in briefs, prepare outline for argument.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/23/2018	\$725.00	4.50	\$3,262.50	Return travel from PDX.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/23/2018	\$725.00	2.50	\$1,812.50	Practice for oral argument; travel to courthouse.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/28/2018	\$725.00	0.30	\$217.50	Email opposing counsel re Costco settlement.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/2/2018	\$250.00	0.10	\$25.00	Review email from EMD to opposing counsel re possible settlement talks and mediation.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/9/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/19/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/21/2018	\$250.00	0.40	\$100.00	Review email from Jean re [REDACTED]. Review case file. Prepare [REDACTED] letter to client. Emails with JGA re same. Email to Amanda Dougherty re [REDACTED]. Coordinate mailing of the same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/2/2018	\$250.00	0.20	\$50.00	Update filing.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/9/2018	\$250.00	0.10	\$25.00	Review emails between JGA and EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/19/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/19/2018	\$725.00	0.10	\$72.50	Team meeting-- [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/26/2018	\$250.00	0.80	\$200.00	Review email from and discuss with JGA re [REDACTED]. Review file. Review local rules re jury fee. Review emails between JGA and co-counsel re [REDACTED]. Review emails between JGA and opposing counsel re joint status report. Phone conference with Judge Vanderwood's clerk re telephone appearance at status conference. Voicemail message with Judge Clark's clerk re telephone appearance at status conference. Email to JGA & EMD re same. Review email from JGA to co-counsel re same. Review and save filed copy of jury demand for file. Emails with co-counsel's assistant to [REDACTED]. Emails with JGA re same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/26/2018	\$450.00	0.50	\$225.00	Draft and edit jury demand and joint status report and email joint status report to opposing counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	4/26/2018	\$450.00	0.30	\$135.00	Research [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/27/2018	\$250.00	0.40	\$100.00	Review emails between EMD and co-counsel re [REDACTED]. Voicemail message with Judge Clark's clerk re telephone appearance at status conference.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/1/2018	\$450.00	0.40	\$180.00	Discuss [REDACTED] with Beth Terrell and Jen Murphy.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/1/2018	\$725.00	0.50	\$362.50	Call re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/1/2018	\$285.00	0.80	\$228.00	Discuss [REDACTED] with John Albanese, check court docket and calendars.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/2/2018	\$450.00	0.40	\$180.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/2/2018	\$250.00	0.60	\$150.00	Review voicemail message from Judge Clark's clerk re scheduling conference. Review email from Judge Lewis' clerk re cancellation of scheduling conference and need to file notice of assignment with new scheduling conference date. Call with Judge Lewis' clerk re dates for scheduling conference. Discuss with and emails with JGA and EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/2/2018	\$250.00	0.50	\$125.00	Review emails between JGA, JCH, and co-counsel's office re [REDACTED]. Review and save drafts for file. Review and save e-filed pro hac vice documents. Prepare amended notice of assignment.
16323	00000	BBSI (DOUGHERTY)	JCH	Hashmall, Joseph C	5/2/2018	\$525.00	0.50	\$262.50	Review and execution of pro hac motion.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/3/2018	\$450.00	0.20	\$90.00	Emails with opposing counsel regarding case status.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/3/2018	\$250.00	0.60	\$150.00	Call with Judge Lewis' clerk re expected date for Judge Vanderwood to issue decision re Summary Judgment, dates for scheduling conference and possible trial dates. Work on Amended Notice of Assignment. Emails with JGA and EMD re same. Calendar [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/4/2018	\$250.00	0.20	\$50.00	Review emails between JGA and opposing counsel re conflict with proposed scheduling conference date. Voicemail message with Judge Lewis' clerk re alternative dates for scheduling conference.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/7/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/7/2018	\$450.00	0.10	\$45.00	Approve revised notice of hearing.

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16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/7/2018	\$250.00	0.50	\$125.00	Phone conference with Judge Lewis' clerk re alternative dates for scheduling conference. Work on amended notice of assignment. Emails with and discuss with JGA and EMD re same. Calendar scheduling conference and deadline to file joint status report. Review emails between JGA and opposing counsel re same. Review emails between JGA and co-counsel's office re filing of amended notice of assignment.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/7/2018	\$250.00	0.20	\$50.00	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/7/2018	\$725.00	0.20	\$145.00	Team meeting to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/8/2018	\$250.00	0.50	\$125.00	Emails with co-counsel's office re filed copy of amended notice of assignment. Save e-stamped copy of same for file. Review and scan notice from Clark County Clerk of Court re JCH pro hac vice application. Emails with co-counsel's office re same. Coordinate mailing of original docs to co-counsel's office for filing. Review and save notice of withdrawal and substitution of counsel filed by defendant's counsel.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/14/2018	\$250.00	0.20	\$50.00	Review emails between JGA and EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/17/2018	\$250.00	0.20	\$50.00	Review emails between Jean and JGA re [REDACTED]. Review and save executed order denying defendant's motion for summary judgment.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/17/2018	\$250.00	0.20	\$50.00	Review executed order granting pro hac vice application of JCH. Scan and save a copy of the same for file.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/17/2018	\$285.00	0.50	\$142.50	Emails re [REDACTED], attempts to retrieve electronic copy.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/18/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	JZH	Hibray, Jean K	5/18/2018	\$285.00	0.50	\$142.50	Emails re [REDACTED], attempts to retrieve electronic copy, call to court re same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/18/2018	\$725.00	0.10	\$72.50	Team meeting to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/21/2018	\$250.00	0.20	\$50.00	Review emails between JGA and opposing counsel re defendant's intent to appeal summary judgment order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/11/2018	\$450.00	3.70	\$1,665.00	Research and draft response to motion for interlocutory appeal.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/11/2018	\$250.00	0.40	\$100.00	Review and save notice for discretionary review, motion to certify order for interlocutory appeal and motion to stay, and related documents filed by BBSI. Review emails between EMD, JGA, and co-counsel re responding to motion and hearing. Calendar hearing and response deadline.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/11/2018	\$250.00	0.20	\$50.00	Review and save affidavit of service filed by BBSI with Court of Appeals. Review notice of filing from court of appeals.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/11/2018	\$725.00	0.30	\$217.50	Deal with opposing counsel and scheduling issues.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/12/2018	\$450.00	0.10	\$45.00	Meet with litigation team regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/12/2018	\$450.00	5.50	\$2,475.00	Draft review and edit response to motion for interlocutory appeal.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/12/2018	\$250.00	0.20	\$50.00	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/12/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/12/2018	\$725.00	0.20	\$145.00	Email with co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/13/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED] g. Save draft for file.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/14/2018	\$450.00	0.40	\$180.00	Phone call with co-counsel regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/14/2018	\$725.00	1.00	\$725.00	Review defendant's reply brief; call with Blythe re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/15/2018	\$250.00	0.20	\$50.00	Review email from opposing counsel re court's denial of defendant's motion to certify order for interlocutory appeal and motion to stay.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/15/2018	\$250.00	0.20	\$50.00	Review email from JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JCH	Hashmall, Joseph C	6/15/2018	\$525.00	0.40	\$210.00	Email to co-counsel regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/15/2018	\$725.00	0.50	\$362.50	Call with opposing counsel and email to JGA re discovery proposal.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/18/2018	\$450.00	1.00	\$450.00	Draft letter to opposing counsel regarding motion to compel compromise.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/18/2018	\$250.00	0.20	\$50.00	Review email from JGA to EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/18/2018	\$250.00	0.20	\$50.00	Review emails from co-counsel and opposing counsel re pleadings related to defendant's motion to certify summary judgment and motion to stay. Save various pleadings for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/19/2018	\$250.00	0.40	\$100.00	Review emails between EMD and JGA re [REDACTED]. Emails with JGA re [REDACTED]. Finalize letter and send to counsel.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/19/2018	\$725.00	0.70	\$507.50	Review Judge Zilly's order and revise draft letter to opposing counsel re discovery agreement.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/21/2018	\$250.00	0.30	\$75.00	Review email from opposing counsel re agreement to produce documents. Calendar deadline to produce documents. Review emails between JGA, EMD, and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/22/2018	\$250.00	0.20	\$50.00	Emails with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/26/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/26/2018	\$450.00	0.90	\$405.00	Draft scheduling order.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/26/2018	\$450.00	1.00	\$450.00	Prepare joint status report.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/28/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	6/29/2018	\$250.00	0.60	\$150.00	Review emails between EMD, JGA, and opposing counsel re joint status report. Save drafts for file. Review emails between EMD and co-counsel re same. Emails with EMD re same. Finalize joint status report. Emails with co-counsel's office re filing of same. Review and save filed copies for file.

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16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/29/2018	\$450.00	0.50	\$225.00	Edit status report and email opposing counsel regarding same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/29/2018	\$725.00	0.80	\$580.00	Review redline and revise opposing counsel re changes to status report.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/2/2018	\$250.00	0.30	\$75.00	Review emails between JGA and co-counsel re [REDACTED]. Review emails between co-counsel and opposing counsel re potential trial dates and status of scheduling conference.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/2/2018	\$450.00	0.10	\$45.00	Phone call with Blythe Chandler regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/5/2018	\$250.00	0.20	\$50.00	Review emails between EMD, JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/5/2018	\$250.00	0.20	\$50.00	Review and save notice of appearance for Brittany Glass filed by co-counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/5/2018	\$450.00	0.30	\$135.00	Review [REDACTED] sent by co-counsel and email edits.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/6/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED]. Review emails between JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/7/2018	\$450.00	0.30	\$135.00	Draft interrogatory and review 30(b)(6) notice.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/9/2018	\$250.00	0.70	\$175.00	Prepare third amended 30(b)(6) notice and declaration of service. Prepare additional interrogatory to defendant. Emails with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/9/2018	\$250.00	0.20	\$50.00	Review emails between EMD and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/9/2018	\$725.00	0.30	\$217.50	Email with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/10/2018	\$450.00	0.30	\$135.00	Edit stipulation and email to opposing counsel.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/10/2018	\$250.00	0.20	\$50.00	Review email from JGA to opposing counsel re draft stipulation regarding class certification matters.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/10/2018	\$250.00	0.40	\$100.00	Finalize 30(b)(6) depo notice and declaration of service. Coordinate delivery of the same by mail. Email to opposing counsel re same. Emails with JGA re logistics for 30(b)(6) depo. Calendar deposition.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/10/2018	\$250.00	0.40	\$100.00	Review email from JGA re [REDACTED]. Finalize supplemental interrogatory to defendant and declaration of service. Coordinate delivery of the same by mail. Email to opposing counsel re same. Calendar response deadline.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/11/2018	\$450.00	0.10	\$45.00	Email with Mai regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/11/2018	\$450.00	0.10	\$45.00	Read email from opposing counsel regarding stipulation.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/11/2018	\$250.00	0.20	\$50.00	Review email from opposing counsel re stipulation regarding class certification deadlines. Review emails between JGA and co-counsel's office re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/11/2018	\$250.00	0.40	\$100.00	Emails with JGA and EMD re [REDACTED]. Emails with Lexitas re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/12/2018	\$250.00	0.40	\$100.00	Review and save filed copy of stipulated scheduling agreement. Review and save notice of trial setting. Calendar dates and deadlines.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/12/2018	\$250.00	0.20	\$50.00	Emails with Lexitas re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/13/2018	\$250.00	0.20	\$50.00	Review email from opposing counsel re conflict with 30(b)(6) depo date.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/18/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/18/2018	\$250.00	0.20	\$50.00	Case meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/18/2018	\$725.00	0.10	\$72.50	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/19/2018	\$250.00	0.60	\$150.00	Review emails between JGA and opposing counsel re new date for 30(b)(6) depo. Prepare amended 30(b)(6) notice and declaration of service. Email to all counsel re same. Coordinate delivery of same to opposing counsel via mail. Emails with and discuss with JGA re [REDACTED]. Update calendar. Emails with Lexitas re updated [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/19/2018	\$450.00	0.20	\$90.00	Emails with opposing counsel re 30(b)(6) and revise 30(b)(6) notice.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/24/2018	\$250.00	0.30	\$75.00	Prepare update letter to client. Emails with JGA re same. Coordinate mailing of same to client. Email to client re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/25/2018	\$250.00	0.20	\$50.00	Review emails between JGA and client re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/31/2018	\$450.00	0.10	\$45.00	Meet with litigation team regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/31/2018	\$250.00	0.20	\$50.00	Meeting with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/31/2018	\$725.00	0.10	\$72.50	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/1/2018	\$450.00	0.20	\$90.00	Review discovery request from BBSI.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/2/2018	\$250.00	0.20	\$50.00	Review and save defendant's request for production of documents. Calendar response deadline.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/6/2018	\$250.00	0.20	\$50.00	Review emails between JGA and opposing counsel re extension for defendant to respond to discovery requests. Update calendar.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/6/2018	\$450.00	0.30	\$135.00	Send [REDACTED] to [REDACTED] counsel.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/7/2018	\$250.00	0.20	\$50.00	Review email from JGA to counsel for [REDACTED] re [REDACTED]. I. Review email from JGA re [REDACTED]. Coordinate delivery of same to counsel [REDACTED] via mail.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/14/2018	\$250.00	0.20	\$50.00	Review email from counsel for [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/14/2018	\$250.00	0.60	\$150.00	Review emails between JGA and Blythe Chandler re [REDACTED]. Review and save scheduling order for file. Discuss [REDACTED] with JGA. Update calendar.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/14/2018	\$450.00	0.40	\$180.00	Discuss [REDACTED] with Liz Peterson.
16323	00000	BBSI (DOUGHERTY)	EWP	Peterson, Elizabeth Woolford	8/14/2018	\$400.00	0.20	\$80.00	Meet with John re [REDACTED].

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16323	00000	BBSI (DOUGHERTY)	EWP	Peterson, Elizabeth Woolford	8/14/2018	\$400 00	4.00	\$1,600.00	Review [REDACTED]; Read [REDACTED].
16323	00000	BBSI (DOUGHERTY)	EWP	Peterson, Elizabeth Woolford	8/14/2018	\$400 00	2.50	\$1,000.00	Research [REDACTED].
16323	00000	BBSI (DOUGHERTY)	EWP	Peterson, Elizabeth Woolford	8/15/2018	\$400 00	0.50	\$200.00	Email John on [REDACTED].
16323	00000	BBSI (DOUGHERTY)	EWP	Peterson, Elizabeth Woolford	8/15/2018	\$400 00	0.30	\$120.00	Review [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/16/2018	\$250.00	0.70	\$175.00	Emails with Blythe re [REDACTED]. Discuss [REDACTED] with JGA. Review initial disclosures, discovery responses and other documents for potential witnesses. Work on disclosure of primary witnesses. Email to JGA and EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/17/2018	\$250.00	0.60	\$150.00	Review emails between JGA and co-counsel's office re [REDACTED]. Finalize disclosure of primary witnesses. Prepare declaration of service. Email to opposing counsel re same. Coordinate delivery of same to opposing counsel via mail.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/17/2018	\$250.00	0.20	\$50.00	Case meeting with litigation team.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/17/2018	\$450 00	0.10	\$45.00	Meet with litigation team regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/17/2018	\$450 00	0.20	\$90.00	Edit primary witness disclosure for BBSI.
16323	00000	BBSI (DOUGHERTY)	JCH	Hashmall, Joseph C	8/17/2018	\$525 00	0.10	\$52.50	Litigation team meeting.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	8/17/2018	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2018	\$250 00	0.20	\$50.00	Review emails from and discuss with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2018	\$250.00	0.20	\$50.00	Review and save defendant's letter and responses to interrogatories.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2018	\$250.00	0.20	\$50.00	Review email from JGA to co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2018	\$250.00	0.30	\$75.00	Review and save documents produced by defendant. Review email from JGA re [REDACTED]. Prepare production ticket. Email to Tim and Sandy re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2018	\$250 00	0.40	\$100.00	Review production database in Kaleidoscope [REDACTED]. Discuss with Jean re [REDACTED]. Review emails between Jean and Tim re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	8/22/2018	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/22/2018	\$250 00	1.00	\$250.00	Review docs in Kaleidoscope [REDACTED]. Assemble docs to be loaded into preproduction database. Prepare production ticket. Email to Tim re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/23/2018	\$250 00	0.50	\$125.00	Prepare responses to defendant's requests for production.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/23/2018	\$250 00	0.20	\$50.00	Check Kaleidoscope to [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/24/2018	\$250.00	0.20	\$50.00	Email to JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/24/2018	\$250.00	0.20	\$50.00	Review emails between JGA and Blythe re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	EWP	Peterson, Elizabeth Woolford	8/27/2018	\$400 00	3.00	\$1,200.00	Reviewed [REDACTED] read [REDACTED]; drafted response to John's question re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/28/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/28/2018	\$250.00	0.20	\$50.00	Check Kaleidoscope [REDACTED]. Emails with Tim re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	8/29/2018	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/29/2018	\$250 00	0.20	\$50.00	Prepare declaration of service of response to defendant's request for production ([REDACTED]).
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/29/2018	\$250.00	1.00	\$250.00	Check Kaleidoscope [REDACTED]. Emails with Tim re [REDACTED]. Code docs in Kaleidoscope for production. Email to JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/30/2018	\$250.00	0.40	\$100.00	Discuss [REDACTED] with JGA. Work on response to request for production.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/30/2018	\$450 00	0.50	\$225.00	Draft response to discovery.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/30/2018	\$250.00	0.50	\$125.00	Discuss [REDACTED] with JGA. Emails with Tim re [REDACTED]. Mark docs in Kaleidoscope and add to organizer for production. Prepare production ticket for documents to be produced. Emails with Tim re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/31/2018	\$250.00	1.20	\$300.00	Finalize response to request for production. Finalize proof of service [REDACTED]. Emails with JGA re [REDACTED]. Email to opposing counsel re same. Coordinate delivery of same to opposing counsel via mail.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/31/2018	\$250.00	0.80	\$200.00	Assemble docs to be produced. Export docs from Kaleidoscope. Emails with IT re [REDACTED]. Upload docs to FTP site.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/6/2018	\$450 00	0.10	\$45.00	Meet with litigation team regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/6/2018	\$250.00	0.20	\$50.00	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/6/2018	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].

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16323	00000	BBSI (DOUGHERTY)	SXX	McCollum, Sandy	9/11/2018	\$57.50	0.40	\$23.00	Create coding fields in the production database; sent email [REDACTED] to John Albanese re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/11/2018	\$250.00	0.20	\$50.00	Emails with Tim re [REDACTED]. Review email from JGA to Sandy re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/12/2018	\$250.00	0.40	\$100.00	Check Kaleidoscope [REDACTED] Emails with Tim re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	9/12/2018	\$43.00	0.40	\$17.20	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/13/2018	\$450.00	0.40	\$180.00	Discuss [REDACTED] with Michelle drake.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/13/2018	\$450.00	3.20	\$1,440.00	Review documents to prepare for deposition.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/13/2018	\$250.00	1.80	\$450.00	Review email from JGA to opposing counsel re name of witness to be deposed. Discuss with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/13/2018	\$250.00	0.20	\$50.00	Assemble and print exhibits
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/13/2018	\$725.00	0.50	\$362.50	Check Kaleidoscope [REDACTED]. Emails with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	9/13/2018	\$43.00	0.40	\$17.20	Meet [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/14/2018	\$450.00	3.10	\$1,395.00	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/14/2018	\$250.00	3.50	\$875.00	Prepare for deposition.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/14/2018	\$250.00	0.20	\$50.00	Emails with Lexitas re [REDACTED]. Discuss with JGA re [REDACTED]. Research [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/16/2018	\$450.00	5.20	\$2,340.00	Prepare amended 30(b)(6) depo notice. Review emails between JGA and opposing counsel re updated notice, and name of individual to be deposed. Prepare declaration of service. Coordinate delivery of same to opposing counsel via mail. Label depo exhibits, assemble exhibit binder, and make copies for witness and opposing counsel. Email [REDACTED] to Blythe.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/17/2018	\$450.00	0.40	\$180.00	Prepare for 30(b)(6) deposition.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/17/2018	\$450.00	0.30	\$135.00	Phone call with Blythe Chandler and Beth Terrell regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/17/2018	\$250.00	0.50	\$125.00	Various emails with Blythe Chandler regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/18/2018	\$450.00	3.10	\$1,395.00	Review emails between JGA and Blythe re [REDACTED]. Emails with Lexitas re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/18/2018	\$250.00	0.30	\$75.00	Emails with Blythe and JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/19/2018	\$450.00	0.20	\$90.00	Attend 30(b)(6) deposition.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/20/2018	\$250.00	0.20	\$50.00	Review emails between Blythe Chandler and JGA re [REDACTED]. Discuss with JGA re [REDACTED]. Emails with Lexitas re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/24/2018	\$450.00	0.30	\$135.00	Respond to email from Joe Vance regarding meet and confer.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/24/2018	\$450.00	0.20	\$90.00	Review emails between JGA and opposing counsel re scheduling meet and confer conference.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/24/2018	\$250.00	0.20	\$50.00	Draft summary of meet and confer and email to co-counsel.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/24/2018	\$450.00	0.20	\$90.00	Email [REDACTED] counsel regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/24/2018	\$250.00	0.20	\$50.00	Discuss with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/26/2018	\$450.00	1.60	\$720.00	Review email from JGA to co-counsel re [REDACTED]. Review email to [REDACTED] counsel re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/26/2018	\$250.00	0.50	\$125.00	Research and draft email to Joe Vance regarding production of mediation documents.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/27/2018	\$450.00	0.40	\$180.00	Review local rules re discovery requests. Prepare second set of request for production of document to defendant. Email to JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	9/27/2018	\$450.00	0.10	\$45.00	Email Joe Vance and Brian Esler regarding mediation documents.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/27/2018	\$250.00	0.20	\$50.00	Meet with litigation team regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	9/27/2018	\$725.00	0.10	\$72.50	Meet and discuss [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/28/2018	\$250.00	0.20	\$50.00	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/28/2018	\$250.00	0.10	\$25.00	Review emails between JGA and Blythe Chandler re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/28/2018	\$250.00	0.10	\$25.00	Review email from JGA to opposing counsel re mediation and settlement related communications re QuickSearch case.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	9/28/2018	\$250.00	0.50	\$125.00	Review email from JGA to co-counsel re [REDACTED]. Finalize second set of request for production. Prepare declaration of service. Coordinate mailing of same. Email to opposing counsel re same. Calendar response deadline.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/1/2018	\$250.00	0.20	\$50.00	Review email from JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/1/2018	\$250.00	0.50	\$125.00	Review emails between JGA and co-counsel re [REDACTED]. Emails with JGA re [REDACTED]. Finalize demand letter. Email to opposing counsel re same. Calendar expiration of settlement demand.

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16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/1/2018	\$250.00	0.40	\$100.00	Review email from Lexitas re depo transcript and exhibits of Heather Wiswall. Download and save transcript and exhibits for the deposition of Heather Wiswall. Prepare production ticket. Email to Tim re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/2/2018	\$250.00	0.50	\$125.00	Emails with and discuss with JGA re [REDACTED]. Emails with Tim re [REDACTED]. Coordinate loading of depo transcripts to FTP site. Emails with JGA re [REDACTED]. Review email from JGA to opposing counsel re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/2/2018	\$250.00	0.40	\$100.00	Review stipulated supplemental scheduling agreement. Calendar deadlines.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/2/2018	\$250.00	0.10	\$25.00	Review email from Tim re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/3/2018	\$450.00	0.30	\$135.00	Call with Blythe Chandler regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/4/2018	\$250.00	0.10	\$25.00	Review email from JGA re co-counsel [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/5/2018	\$250.00	0.50	\$125.00	Review emails between JGA and co-counsel re [REDACTED]. Save drafts for file. Emails with and discuss with JGA re [REDACTED]. Export defendant's first production to upload to FTP site. Email to Tim re FTP site.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/5/2018	\$250.00	0.30	\$75.00	Review emails between Rita and JGA re [REDACTED]. Emails with Lexitas re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	10/5/2018	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/8/2018	\$250.00	0.30	\$75.00	Emails with Lexitas re [REDACTED]. Save [REDACTED]. [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/8/2018	\$250.00	0.40	\$100.00	Emails with Eddie Cruz [REDACTED]. Upload docs produced by defendant to FTP site. Email to Blythe re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/8/2018	\$250.00	1.40	\$350.00	Review emails between EMD and JGA re [REDACTED]. Emails with Lexitas re [REDACTED]. Prepare and finalize deposition notices for Pete Cuthbert and Jean Gallo. Emails with JGA re [REDACTED]. Prepare declaration of service. Email to all counsel re same. Coordinate delivery of same to opposing counsel by mail. Emails with Lexitas re [REDACTED]. Add depositions to calendar.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/8/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/8/2018	\$250.00	0.20	\$50.00	Review emails between JGA, EMD and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/8/2018	\$450.00	0.80	\$360.00	Review co-counsel's [REDACTED] and email co-counsel regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/11/2018	\$250.00	0.50	\$125.00	Emails with JCH and Jonathan Jaffe re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/12/2018	\$250.00	0.20	\$50.00	Scan and save [REDACTED]. Email to Beverly re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/12/2018	\$250.00	0.20	\$50.00	Review emails between JGA and opposing counsel re scheduling call to discuss mediation. Review emails between JGA and co-counsel re same.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/12/2018	\$450.00	0.20	\$90.00	Emails with opposing counsel regarding mediation.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/15/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/15/2018	\$250.00	0.60	\$150.00	Review emails between EMD and co-counsel re [REDACTED]. Review emails between EMD and opposing counsel re list of mediators. Emails with JGA re [REDACTED]. Emails with Paris Kallas's office re availability to mediate case. Email to Lou Peterson re availability to mediate case. Email to Margo Keller re availability to mediate case.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/15/2018	\$250.00	0.40	\$100.00	Update calendars [REDACTED]. Emails with Lexitas re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/15/2018	\$250.00	0.20	\$50.00	Meet with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/15/2018	\$725.00	0.10	\$72.50	Meet on [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/15/2018	\$725.00	0.50	\$362.50	Email and call with opposing counsel re settlement prospects.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/16/2018	\$250.00	0.40	\$100.00	Emails with Lexitas re [REDACTED]. Discuss [REDACTED] with John. Update calendar.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/16/2018	\$250.00	0.60	\$150.00	Emails with Paris Kallas's office re availability to mediate case. Emails with Rod Max's office re availability to mediate case. Emails with Lou Peterson's office re availability to mediate case. Emails with and discuss with JGA and EMD re mediators' availability. Review emails between EMD, co-counsel, and opposing counsel re same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/16/2018	\$725.00	0.30	\$217.50	Email opposing counsel re mediators.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/17/2018	\$450.00	0.30	\$135.00	Emails with mediator regarding mediation.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/17/2018	\$250.00	0.70	\$175.00	Review email from opposing counsel re mediator selection and availability. Emails with Paris Kallas's office to schedule mediation. Emails with JGA re same. Review email between JGA, Paris Kallas' office, and opposing counsel re details for mediation. Calendar mediation. Emails with Lou Peterson re selection of different mediator.

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16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/17/2018	\$725 00	0.20	\$145.00	Emails with opposing counsel re schedule and settlement logistics.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/19/2018	\$450 00	0.50	\$225.00	Emails with Joe Vance and co-counsel regarding case schedule and mediation.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/22/2018	\$250.00	0.20	\$50.00	Emails with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/23/2018	\$250.00	0.50	\$125.00	Review email from Lexitas re [REDACTED]. Emails with Lexitas re [REDACTED]. Update calendar. Emails with JGA re [REDACTED]. Emails with Lexitas re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/23/2018	\$250.00	0.30	\$75.00	Review letter, invoice and other docs from Paris Kallas' office for mediation. Scan and save copies of same for file. Update calendar. Email to EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/24/2018	\$250 00	0.20	\$50.00	Emails with EMD re [REDACTED]. Email to Beverly re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/25/2018	\$250 00	0.40	\$100.00	Emails with Beverly re [REDACTED]. Emails with JDM re W9.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/30/2018	\$250 00	0.50	\$125.00	Review email from opposing counsel's office. Download and save letter from opposing counsel, defendant's responses to request for production and document production. Prepare production ticket. Email to Tim re [REDACTED]. Emails with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	10/31/2018	\$450 00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	10/31/2018	\$250.00	0.10	\$25.00	Meeting with team re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/31/2018	\$725 00	0.10	\$72.50	Meet on [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	10/31/2018	\$725 00	0.30	\$217.50	Emails with opposing counsel and clerk re scheduling.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/2/2018	\$250.00	0.40	\$100.00	Review emails between counsel and Judge Lewis' chambers re striking half day hearings in December and resetting hearing for March 8, 2019. Review local rules re motion deadlines. Update calendar.
16323	00000	BBSI (DOUGHERTY)	AR	Rajendran, Arun	11/2/2018	\$43.00	0.20	\$8.60	Copy the data from cd/hard drive/ftp/website to the server. [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/5/2018	\$250 00	0.20	\$50.00	Check Kaleidoscope [REDACTED] Email to JGA and EMD re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/9/2018	\$250.00	0.20	\$50.00	Emails with EMD and JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/12/2018	\$250.00	0.20	\$50.00	Review emails between JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	11/19/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/19/2018	\$250.00	0.20	\$50.00	Attend [REDACTED] meeting with team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	11/19/2018	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	11/28/2018	\$250.00	0.20	\$50.00	Review emails between EMD, JGA and co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/5/2018	\$250.00	0.10	\$25.00	Review email from JDR re deadline to cancel/continue mediation.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/10/2018	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/10/2018	\$250.00	0.20	\$50.00	Discuss [REDACTED] with team.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/10/2018	\$725 00	0.10	\$72.50	Team meeting re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/12/2018	\$725 00	0.50	\$362.50	Review mediation submission.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	12/12/2018	\$450.00	0.50	\$225.00	Review and edit mediation statement.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/13/2018	\$250.00	0.30	\$75.00	Emails with JGA re [REDACTED]. Review email from co-counsel to Judge Paris Kallas re mediation brief. Save a copy for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/14/2018	\$250 00	0.20	\$50.00	Email to EMD re docs for mediation. Review emails between co-counsel and Judge Kallas' office confirming attendees for mediation.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/17/2018	\$250 00	0.40	\$100.00	Review email from mediator's office confirming attendees for mediation. Emails with co-counsel's office re [REDACTED]. Emails with EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/18/2018	\$725 00	4.00	\$2,900.00	Travel to Seattle for mediation.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/18/2018	\$725 00	8.50	\$6,162.50	Attend mediation.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	12/19/2018	\$250.00	0.30	\$75.00	Review emails between JGA and EMD re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/19/2018	\$725 00	4.00	\$2,900.00	Return travel from mediation.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	12/21/2018	\$725 00	0.30	\$217.50	Email with co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/2/2019	\$250.00	0.20	\$50.00	Review and save letter from co-counsel to opposing counsel re dates for depositions and other discovery issues. Review emails between co-counsel and opposing counsel re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/3/2019	\$250.00	0.20	\$50.00	Review upcoming deadlines. Discuss with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/3/2019	\$725 00	0.30	\$217.50	Review redlines to term sheet; email co-counsel re same.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/4/2019	\$725.00	0.30	\$217.50	Review and approve CR2A agreement.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/4/2019	\$250.00	0.20	\$50.00	Review emails between co-counsel and opposing counsel re settlement amount and revised CR2A agreement. Save versions of CR2A agreement for file. Review emails from JGA to co-counsel re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/4/2019	\$725 00	0.30	\$217.50	Review spreadsheet from Joe Vance re data on class members.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/7/2019	\$250.00	0.20	\$50.00	Emails with Beth Terrell re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/10/2019	\$450.00	0.80	\$360.00	Review and edit settlement agreement.

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16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/11/2019	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/11/2019	\$250.00	0.20	\$50.00	Emails with co-counsel's office re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/11/2019	\$250.00	0.10	\$25.00	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/11/2019	\$725.00	0.10	\$72.50	Meet with team re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/16/2019	\$450.00	0.20	\$90.00	Call with Blythe chandler regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	1/16/2019	\$450.00	0.20	\$90.00	Discuss [REDACTED] with Mai Xiong.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	1/16/2019	\$250.00	0.30	\$75.00	Review email from co-counsel's office to opposing counsel re settlement agreement. Save draft settlement agreement for file. Email to co-counsel's office re [REDACTED]. Discuss [REDACTED] with JGA.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	1/30/2019	\$725.00	0.10	\$72.50	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/5/2019	\$450.00	0.20	\$90.00	Review [REDACTED] and email co-counsel regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/12/2019	\$250.00	0.20	\$50.00	Review emails between JGA and Blythe re sign [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/12/2019	\$250.00	0.50	\$125.00	Prepare preliminary approval brief.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/12/2019	\$250.00	0.20	\$50.00	Review email from opposing counsel's office re stipulated protective order regarding class member data filed with the court. Save copy of same for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/12/2019	\$250.00	0.40	\$100.00	Review emails between parties re settlement terms, settlement agreement, settlement notices, and preliminary approval. Save drafts of settlement agreement and settlement notices for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/12/2019	\$250.00	0.20	\$50.00	Review and save second joint notice of settlement and request for stay and proposed order filed with the court.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/12/2019	\$250.00	0.30	\$75.00	Prepare [REDACTED] to Amanda Dougherty re [REDACTED]. Emails with JGA re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/14/2019	\$250.00	2.50	\$625.00	Review case file. Work on preliminary approval brief.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/14/2019	\$250.00	0.20	\$50.00	Review and save settlement agreement signed by defendant and opposing counsel.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/14/2019	\$250.00	0.10	\$25.00	Review email from Blythe re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	2/15/2019	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/15/2019	\$250.00	2.50	\$625.00	Review case file. Work on preliminary approval brief.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/15/2019	\$250.00	0.60	\$150.00	Emails with JGA re [REDACTED]. Resend [REDACTED] to Amanda to Update Captorra with [REDACTED]. Review and save signed settlement agreement from Amanda. Print and have EMD sign settlement agreement. Emails with JGA re fully executed copy. Email to all counsel re fully executed copy of settlement agreement.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	2/15/2019	\$725.00	0.10	\$72.50	Meet with team re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/18/2019	\$250.00	1.00	\$250.00	Work on preliminary approval motion brief.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/19/2019	\$250.00	1.50	\$375.00	Work on preliminary approval motion brief. Email to JGA re [REDACTED]. Prepare declaration of EMD in support of motion for preliminary approval. Assemble exhibits to EMD Decl.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/20/2019	\$250.00	0.10	\$25.00	Review email from JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/21/2019	\$250.00	0.40	\$100.00	Review email from JGA re [REDACTED]. Prepare proposed order preliminarily approving settlement.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/21/2019	\$250.00	0.20	\$50.00	Pull [REDACTED] report. Emails with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/21/2019	\$250.00	0.30	\$75.00	Review emails between JGA and Blythe re [REDACTED]. Review email from Beth re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/25/2019	\$250.00	1.30	\$325.00	Review local rules. Review settlement agreement. Work on proposed order granting preliminary approval. Email to JGA re same.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/27/2019	\$250.00	0.30	\$75.00	Review calendar and file. Email to JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/27/2019	\$250.00	0.20	\$50.00	Review emails between JGA and Blythe re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/28/2019	\$250.00	0.10	\$25.00	Review email from JGA to Blythe re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	2/28/2019	\$250.00	0.20	\$50.00	Review email from Blythe re [REDACTED]. Save data for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/1/2019	\$250.00	0.20	\$50.00	Review emails between JGA Blythe and Beth re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/1/2019	\$450.00	0.30	\$135.00	Emails with co-counsel regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/4/2019	\$250.00	0.20	\$50.00	Review emails between JGA EMD and Beth re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/6/2019	\$250.00	0.10	\$25.00	Review emails between EMD and JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/6/2019	\$725.00	0.10	\$72.50	Email opposing counsel re status on settlement.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/14/2019	\$450.00	2.60	\$1,170.00	Edit and revise motion for preliminary approval.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/14/2019	\$250.00	0.10	\$25.00	Review email from JGA to Blythe re update [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/14/2019	\$250.00	0.50	\$125.00	Work on declaration of EMD in support of preliminary approval. Emails with JGA re [REDACTED]

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16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/14/2019	\$250.00	0.10	\$25.00	Meeting with team re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	3/14/2019	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/19/2019	\$250.00	0.20	\$50.00	Review emails between JGA and Blythe re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/22/2019	\$250.00	0.10	\$25.00	Touch base with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	3/26/2019	\$250.00	0.10	\$25.00	Meet with team to discuss [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	3/26/2019	\$725.00	0.10	\$72.50	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/9/2019	\$725.00	0.10	\$72.50	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/12/2019	\$250.00	0.20	\$50.00	Review email from Bradford Kinsey re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	4/19/2019	\$725.00	0.10	\$72.50	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/24/2019	\$250.00	0.10	\$25.00	Review email from JGA to co-counsel re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	4/29/2019	\$250.00	0.10	\$25.00	Review emails between JGA and co-counsel re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/8/2019	\$250.00	0.10	\$25.00	Review email from JGA to co-counsel re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/9/2019	\$450.00	0.10	\$45.00	Meet with case team regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/9/2019	\$250.00	0.10	\$25.00	Team meeting re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/9/2019	\$725.00	0.10	\$72.50	Team meeting to discuss [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/10/2019	\$250.00	0.20	\$50.00	Listen to voicemail message from George Boskie. Emails with JGA re vo [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/16/2019	\$450.00	0.30	\$135.00	Review documents sent by co-counsel regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/21/2019	\$250.00	0.10	\$25.00	Review emails from Blythe re ad [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/21/2019	\$250.00	0.50	\$125.00	Review emails between Blythe and JGA re media [REDACTED] [REDACTED] Print copy of amended settlement agreement for EMD to sign. Review emails from opposing counsel with signature pages for opposing counsel and defendant. Prepare [REDACTED] to Amanda Dougherty re [REDACTED] Review and save signed settlement agreement from Amanda. Emails with JGA and EMD re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/21/2019	\$450.00	0.20	\$90.00	Discuss [REDACTED] with client.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/23/2019	\$450.00	0.30	\$135.00	Review Blythe's edits to preliminary approval memorandum and order and email Michelle Drake regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/24/2019	\$450.00	0.20	\$90.00	Phone call with Blythe Chandler regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	5/28/2019	\$450.00	1.60	\$720.00	Review and edit preliminary approval brief and Michelle Drake's declaration.
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	5/28/2019	\$725.00	0.10	\$72.50	Team meeting to [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	5/30/2019	\$250.00	0.20	\$50.00	Review emails between Blythe and JGA re revised [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	6/13/2019	\$450.00	0.10	\$45.00	Meet with litigation team regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	6/13/2019	\$725.00	0.10	\$72.50	Team meeting to [REDACTED]
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/2/2019	\$450.00	0.20	\$90.00	Review emails from administrator and email class notices.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/8/2019	\$450.00	0.10	\$45.00	Email with co-counsel regarding [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/8/2019	\$250.00	0.30	\$75.00	Review emails between JGA and co-counsel re [REDACTED]. Review case status on Superior Court of Washington website. Emails with JGA re [REDACTED] Calendar final approval hearing.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/8/2019	\$250.00	0.20	\$50.00	Review emails between JGA and Ryan Bahry re settlement timeline, word versions of notices, and website URL. Review emails between Ryan and counsel re proceeding with email skip trace and settlement website URL.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/8/2019	\$250.00	0.10	\$25.00	Meet with team to discuss [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/8/2019	\$725.00	0.10	\$72.50	Team meeting [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/9/2019	\$250.00	0.10	\$25.00	Review emails between JGA and Ryan Bahry re formatted notices and payout estimates. Save copies of notices for file.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/10/2019	\$450.00	0.80	\$360.00	Review and approve settlement notices.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/10/2019	\$250.00	1.00	\$250.00	Prepare settlement time line. Check settlement admin's settlement timeline with our settlement timeline.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/10/2019	\$250.00	0.20	\$50.00	Review file. Emails with JGA re [REDACTED]
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/10/2019	\$250.00	0.20	\$50.00	Review emails between Ryan Bahry re comments/edits to formatted notices. Save updated versions for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/17/2019	\$250.00	0.10	\$25.00	Review email from settlement admin re information website and claim form test.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/18/2019	\$250.00	0.10	\$25.00	Review follow up email from settlement admin re test website and claim form.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/22/2019	\$450.00	0.10	\$45.00	Discuss [REDACTED] with litigation team.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/22/2019	\$250.00	0.10	\$25.00	Team meeting re [REDACTED]

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16323	00000	BBSI (DOUGHERTY)	MXD	Drake, E. Michelle	7/22/2019	\$725 00	0.10	\$72.50	Team meeting to [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/24/2019	\$450 00	0.20	\$90.00	Review preliminary approval order.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/25/2019	\$250.00	0.10	\$25.00	Review emails between settlement admin and co-counsel re [REDACTED]. Review email from settlement admin re email campaign commenced, mailed notices, website, online form, and toll-free number live.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/25/2019	\$250.00	0.40	\$100.00	Review and save executed final approval order. Calendar deadline to file motion for attorneys' fees and costs, deadline to file final approval motion other deadlines and final approval hearing.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/25/2019	\$250 00	0.40	\$100.00	Calendar settlement related deadlines.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/30/2019	\$250 00	0.10	\$25.00	Review email from settlement admin re weekly settlement report. Save copy of same for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	7/30/2019	\$250 00	0.10	\$25.00	Review emails between JGA and settlement admin re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	7/30/2019	\$450 00	0.20	\$90.00	Correspond with Amanda Dougherty regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/6/2019	\$450 00	0.20	\$90.00	Review [REDACTED] and email Blythe chandler regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/7/2019	\$250.00	0.10	\$25.00	Review email from Courtney Arndt re [REDACTED]. Review email from JGA re [REDACTED]. Save [REDACTED] for file.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/7/2019	\$450 00	0.20	\$90.00	Review online claims form.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/8/2019	\$250.00	0.10	\$25.00	Review email from JGA to Blythe Chandler re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/9/2019	\$250.00	0.10	\$25.00	Review emails between JGA and Blythe Chandler re [REDACTED]. Update calendar.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/9/2019	\$250.00	0.10	\$25.00	Meet with team to discuss [REDACTED].
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/9/2019	\$450.00	0.10	\$45.00	Meet with litigation team regarding [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/13/2019	\$250.00	0.10	\$25.00	Review email from co-counsel their fees and costs. Save copies of same for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/13/2019	\$250.00	0.10	\$25.00	Review email from settlement admin re weekly settlement status report [REDACTED]. Save copies of same for file.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2019	\$250.00	2.00	\$500.00	Pull updated fees and costs reports. Review Settlement Agreement. Prepare motion for attorneys' fees, costs, and service awards.
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2019	\$250.00	0.50	\$125.00	Prepare declaration of Amanda Dougherty in support of service award. Emails with JGA re [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/21/2019	\$250.00	0.10	\$25.00	Review email from Ryan Bahry re settlement status report and [REDACTED]. Save copy of same for file. Review email from JGA to Ryan [REDACTED].
16323	00000	BBSI (DOUGHERTY)	MX	Xiong, Mai	8/23/2019	\$250.00	2.00	\$500.00	Work on motion for attorneys' fees, costs, and service awards.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/26/2019	\$450 00	0.20	\$90.00	Review and edit named Plaintiff declaration.
16323	00000	BBSI (DOUGHERTY)	JGA	Albanese, John G	8/26/2019	\$450 00	0.20	\$90.00	Phone call with [REDACTED].

Terrell Marshall Law Group PLLC
Dougherty v. Barrett Business Services, Inc.
Matter 1921-001

Date	Initials	Narrative	Units	Rate	Value
Professional: Amanda Steiner					
12/6/2017	AMS	Reviewed and revised reply in support of motion to compel [6].	0.6	\$ 700.00	\$ 420.00
		Professional: Amanda Steiner	0.6		\$ 420.00
Professional: Bradford Kinsey					
8/4/2017	ABK	Researched procedure for judge assignments in Clark County Superior Court. [1.6]. Called Clark County Clerk. [1].	1.7	\$ 275.00	\$ 467.50
		Professional: Bradford Kinsey	1.7		\$ 467.50
Professional: Beth Terrell					
6/28/2017	BET	Reviewed defendant's motion to change venue; coordinated with co-counsel regarding case strategy.	0.1	\$ 725.00	\$ 72.50
7/18/2017	BET	Reviewed and worked on plaintiff's response to defendant's motion to change venue.	0.3	\$ 725.00	\$ 217.50
7/28/2017	BET	Coordinated with co-counsel regarding [REDACTED].	0.1	\$ 725.00	\$ 72.50
9/12/2017	BET	Reviewed defendant's citation regarding defendant's motion for summary judgment.	0.1	\$ 725.00	\$ 72.50
12/6/2017	BET	Worked on reply in support of plaintiff's motion to compel.	0.3	\$ 725.00	\$ 217.50
2/1/2018	BET	Reviewed amended notice of assignment to judicial department and setting scheduling conference date.	0.1	\$ 725.00	\$ 72.50
5/1/2018	BET	Worked on and reviewed plaintiff's notice of disqualification pursuant to RCW 4.12.040 and RCW 4.12.050 and proposed order.	0.3	\$ 725.00	\$ 217.50
6/26/2018	BET	Reviewed ruling dismissing discretionary review.	0.1	\$ 725.00	\$ 72.50
8/17/2018	BET	Reviewed plaintiff's primary witness disclosures.	0.1	\$ 725.00	\$ 72.50
8/24/2018	BET	Coordinated with co-counsel regarding [REDACTED].	0.1	\$ 725.00	\$ 72.50
9/28/2018	BET	Reviewed demand letter.	0.1	\$ 725.00	\$ 72.50
10/12/2018	BET	Coordinated with co-counsel regarding [REDACTED].	0.1	\$ 725.00	\$ 72.50
10/16/2018	BET	Coordinated with co-counsel regarding [REDACTED].	0.1	\$ 725.00	\$ 72.50
12/10/2018	BET	Reviewed and worked on mediation memorandum.	0.2	\$ 725.00	\$ 145.00
12/18/2018	BET	Participated in mediation [7]; prepared for same [2].	7.2	\$ 725.00	\$ 5,220.00
2/5/2019	BET	Telephone conference with Mr. Vance regarding class member data [2].	0.2	\$ 725.00	\$ 145.00
5/16/2019	BET	Personal meeting with Ms. Chandler regarding [REDACTED] [1].	0.1	\$ 725.00	\$ 72.50
		Professional: Beth Terrell	9.6		\$ 6,670.00
Professional: Blythe Chandler					
7/28/2016	BHC	Analyzed [REDACTED] [5].	0.5	\$ 425.00	\$ 212.50
6/12/2018	BHC	Reviewed briefs in preparation for oral argument on motion to certify question for interlocutory appeal [1.8].	1.8	\$ 425.00	\$ 765.00
6/13/2018	BHC	Read [REDACTED] [4.9]. Worked on Plaintiff's response to Defendant's motion to certify for interlocutory appeal [8].	5.7	\$ 425.00	\$ 2,422.50
		Telephone conference with co-counsel regarding [REDACTED] [5]. Legal research related to [REDACTED] [1.5]. Prepared for oral argument [5].	7	\$ 425.00	\$ 2,975.00
6/14/2018	BHC	Travel to and from hearing on motion to certify order for interlocutory review and argued same [7].	7	\$ 425.00	\$ 2,975.00
6/15/2018	BHC	Email to co-counsel regarding [REDACTED] [2].	0.2	\$ 425.00	\$ 85.00
6/21/2018	BHC	Exchanged emails with co-counsel regarding [REDACTED] [2].	0.2	\$ 425.00	\$ 85.00
6/28/2018	BHC	Exchanged emails with co-counsel regarding [REDACTED] [1].	0.1	\$ 425.00	\$ 42.50
6/29/2018	BHC	[REDACTED]			

	Telephone conference with chambers of Judge Lewis regarding proposed trial date and scheduling conference [.2]; email to co-counsel regarding [REDACTED] [2]. Telephone call from Mr. Vance regarding trial date and scheduling conference [1]. Provided co-counsel with [REDACTED] [7].	1.2	\$ 425.00	\$	510.00
7/3/2018 BHC	Worked with co-counsel on [REDACTED] [5].	0.5	\$ 425.00	\$	212.50
7/5/2018 BHC	Exchanged emails with co-counsel regarding [REDACTED] [2].	0.2	\$ 425.00	\$	85.00
8/14/2018 BHC	Exchanged emails with co-counsel regarding [REDACTED] [1].	0.1	\$ 425.00	\$	42.50
8/23/2018 BHC	Exchanged emails with co-counsel regarding [REDACTED] [1].	0.1	\$ 425.00	\$	42.50
8/24/2018 BHC	Worked on logistics related to Rule 30(b)(6) deposition [3].	0.3	\$ 425.00	\$	127.50
9/14/2018 BHC	Reviewed documents, prepared outline, and prepared to take Rule 30(b)(6) deposition [7.5]. Telephone conference with co-counsel [REDACTED] [5]. Travel to Vancouver for Rule 30(b)(6) deposition [3.5].	11.5	\$ 425.00	\$	4,887.50
9/17/2018 BHC	Prepared for Rule 30(b)(6) deposition [3]. Rule 30(b)(6) deposition of BBSI [3.6]. Travel from Rule 30(b)(6) deposition [3.2].	7.1	\$ 425.00	\$	3,017.50
9/18/2018 BHC	Responded to inquiry from court reporter regarding list of exhibits for Wiswall deposition [2].	0.2	\$ 425.00	\$	85.00
9/19/2018 BHC	Reviewed second set of requests for production served on BBSI [1]; reviewed and approved settlement demand letter from co-counsel [4].	0.5	\$ 425.00	\$	212.50
9/28/2018 BHC	Worked on list of discovery needed before class cert [1.3]. Telephone call from co-counsel regarding [REDACTED] [3].	1.6	\$ 425.00	\$	680.00
10/3/2018 BHC	Drafted Plaintiff's third set of interrogatories [4]. Letter to Mr. Vance regarding document production [8]. Email to co-counsel regarding [REDACTED] [5]. Worked on outline for motion for class certification [9].	2.6	\$ 425.00	\$	1,105.00
10/5/2018 BHC	Finalized third set of interrogatories and letter to counsel regarding document production and sent to staff [2]. Worked on Plaintiff's motion for class certification [6].	0.8	\$ 425.00	\$	340.00
10/8/2018 BHC	Exchanged emails with co-counsel regarding [REDACTED] [2].	0.2	\$ 425.00	\$	85.00
10/18/2018 BHC	Worked on Plaintiff's mediation submission [7].	0.7	\$ 425.00	\$	297.50
11/30/2018 BHC	Worked on mediation submission [1.8].	1.8	\$ 425.00	\$	765.00
12/7/2018 BHC	Worked on mediation submission [3.5].	3.5	\$ 425.00	\$	1,487.50
12/10/2018 BHC	Finalized mediation statement and approved for submission [8]. Email to counsel for BBSI regarding mediation start time; call and email to mediator regarding same [2].	1	\$ 425.00	\$	425.00
12/13/2018 BHC	Worked on supplemental mediation submission [2]. Organized materials for mediation and set up distribution spreadsheet [8].	2.8	\$ 425.00	\$	1,190.00
12/14/2018 BHC	Finalized BBSI mediation supplemental submission and approved for submission to mediator [3].	0.3	\$ 425.00	\$	127.50
12/17/2018 BHC	Participated in mediation [7]; prepared for same [2].	7.2	\$ 425.00	\$	3,060.00
12/18/2018 BHC	Worked on proposed schedule for class certification briefing [3].	0.3	\$ 500.00	\$	150.00
12/19/2018 BHC	Email to co-counsel regarding [REDACTED] [4].	0.4	\$ 500.00	\$	200.00
12/20/2018 BHC	Worked with staff on preparing and issuing subpoenas to [REDACTED] [1.5]; drafted exhibit A to subpoenas [4]. Letter to Mr. Vance regarding case schedule and outstanding discovery matters [1.8].	3.7	\$ 425.00	\$	1,572.50
12/21/2018 BHC	Email and telephone call with co-counsel regarding [REDACTED] [2]. Worked with staff on subpoenas to [REDACTED] [1].	0.3	\$ 425.00	\$	127.50
12/26/2018 BHC	Telephone call with [REDACTED] [2].	0.2	\$ 425.00	\$	85.00
1/2/2019 BHC	Reviewed proposed notice of settlement and suggested revision to same [1].	0.1	\$ 500.00	\$	50.00
1/7/2019 BHC	Drafted script for calls to [REDACTED] [3]. Email to Mr. Vance providing list of vendors and requesting approval of JND as potential claims administrator [3].	0.6	\$ 425.00	\$	255.00
1/10/2019 BHC					

1/11/2019 BHC	Email to counsel for PeopleFacts regarding subpoena for class member data [2].	0.2	\$ 500.00	\$ 100.00
1/16/2019 BHC	Email to co-counsel regarding [REDACTED] [2].	0.2	\$ 500.00	\$ 100.00
1/17/2019 BHC	Worked on proposed settlement class notices [2.2]. Worked on settlement agreement and notice documents and circulated same to all counsel [1]. Telephone call with co-counsel [REDACTED] [1].	2.2	\$ 500.00	\$ 1,100.00
1/18/2019 BHC	[1].	1.1	\$ 500.00	\$ 550.00
1/22/2019 BHC	Email to JND Legal Administration regarding request for proposal.	0.6	\$ 500.00	\$ 300.00
1/23/2019 BHC	Email to co-counsel regarding [REDACTED] [2]. Exchanged emails with settlement administrator regarding proposed notice [1]. Analyzed issues [REDACTED]; email to co-counsel regarding [REDACTED] [4].	0.3	\$ 500.00	\$ 150.00
1/24/2019 BHC	Telephone conference with Mr. Vance regarding class member data [2]. Worked on stipulation regarding class member data [4]. Worked on second notice to the court regarding settlement and proposed order striking hearing [3]. Worked on joint subpoenas to Defendant's vendors and cover letter regarding same [4]. Email to co-counsel [REDACTED] [4].	0.4	\$ 500.00	\$ 200.00
2/5/2019 BHC	Worked on joint subpoena documents; sent same to counsel for BBSI [4]. Email to Court's judicial assistant regarding proposed order striking hearing [6]. Email to Mr. Vance providing proposed stipulation regarding schedule and data and proposed order [4].	1.7	\$ 500.00	\$ 850.00
2/6/2019 BHC	Approved stipulation and proposed order regarding data for filing [2]. Approved joint notice regarding stay and proposed order striking hearing for filing [1].	1.4	\$ 500.00	\$ 700.00
2/7/2019 BHC		0.3	\$ 500.00	\$ 150.00
2/11/2019 BHC	Email to staff [REDACTED] [1]. Email to co-counsel regarding [REDACTED] [3]. Email providing settlement agreement with BET signature to all counsel [2]. Telephone call from Mr. Vance regarding subpoenas for class data [1].	0.4	\$ 500.00	\$ 200.00
2/12/2019 BHC	Exchanged emails with Mr. Vance following up on status of subpoenas to vendors [1].	0.3	\$ 500.00	\$ 150.00
2/21/2019 BHC		0.1	\$ 500.00	\$ 50.00
2/27/2019 BHC	Reviewed and approved cover letter for subpoenas seeking class data [1]. Email to Mr. Vance seeking signature on final joint subpoenas [1]; exchanged further correspondence regarding same [2]. Exchanged emails with co-counsel regarding [REDACTED] [1]. Telephone call to court confirming that hearing on class certification has been stricken from court's calendar [1].	0.6	\$ 500.00	\$ 300.00
2/28/2019 BHC	Reviewed supplemental list of class records for vendor subpoenas from BBSI, noted increase in number. Email to co-counsel regarding [REDACTED] [9]. Exchanged emails with co-counsel regarding [REDACTED] [2].	0.9	\$ 500.00	\$ 450.00
3/1/2019 BHC		0.2	\$ 500.00	\$ 100.00
3/6/2019 BHC	Checked status of [REDACTED] with staff [1]. Telephone call from [REDACTED] regarding [REDACTED] [1]; follow up email regarding same [1]. Telephone call from [REDACTED] regarding [REDACTED] [1]. Telephone call from [REDACTED] regarding [REDACTED] [2]; follow up email regarding same [2].	0.1	\$ 500.00	\$ 50.00
3/7/2019 BHC	Reviewed data produced by [REDACTED] follow up message to [REDACTED] regarding need for contact information [2].	0.7	\$ 500.00	\$ 350.00
3/8/2019 BHC		0.2	\$ 500.00	\$ 100.00
3/12/2019 BHC	Voice message from [REDACTED]; telephone conference with [REDACTED] follow up email regarding same [2]. Responded to email from [REDACTED] [1].	0.9	\$ 500.00	\$ 450.00
3/28/2019 BHC	Email to [REDACTED] [6]. Telephone call with [REDACTED] [2]; follow up email regarding same [2].	0.4	\$ 500.00	\$ 200.00
4/2/2019 BHC	Email to [REDACTED] [2]. Worked with staff on issues related to [REDACTED] [4].	0.6	\$ 500.00	\$ 300.00
4/3/2019 BHC	Letter to [REDACTED] [4].	0.4	\$ 500.00	\$ 200.00

4/9/2019 BHC	Email to [REDACTED] [.1]. Email to settlement administrator regarding data [.2].	0.3	\$ 500.00	\$ 150.00
4/15/2019 BHC	Email to [REDACTED] [.4].	0.4	\$ 500.00	\$ 200.00
4/26/2019 BHC	Email to co-counsel regarding [REDACTED] [.5].	0.5	\$ 500.00	\$ 250.00
5/6/2019 BHC	Telephone call from [REDACTED] [REDACTED]; follow up email regarding same [.1]. Email to counsel for [REDACTED] [.1].	0.2	\$ 500.00	\$ 100.00
5/8/2019 BHC	Reviewed data and status of subpoenas [.6]; email to co-counsel regarding [REDACTED] [.2].	0.8	\$ 500.00	\$ 400.00
5/9/2019 BHC	Checked class list from [REDACTED] email to M [REDACTED] [.1].	0.1	\$ 500.00	\$ 50.00
5/10/2019 BHC	Email from [REDACTED] [.1]. Telephone call from [REDACTED] [.1]; follow up email regarding same [.1]. Reviewed proposed stipulation and order from [REDACTED] [.1]; email memorandum to co-counsel [REDACTED] [.5].	0.1	\$ 500.00	\$ 50.00
5/14/2019 BHC	Analyzed status of subpoena project and data received [.4]. Worked on amended settlement agreement [.4].	0.8	\$ 500.00	\$ 400.00
5/15/2019 BHC	Personal meeting with Ms. Terrell regarding [REDACTED] [.1]. Email to Mr. Vance providing updated settlement agreement [2]. Email memorandum to co-counsel regarding [REDACTED] [.3].	0.8	\$ 500.00	\$ 400.00
5/16/2019 BHC	Worked on motion for preliminary approval and proposed order [3]. Read and responded to email to [REDACTED] [.1].	3	\$ 500.00	\$ 1,500.00
5/21/2019 BHC	Telephone conference with Mr. Albanese regarding motion for preliminary approval [.1]; email to Mr. Vance regarding same [.1]. Worked on Terrell Declaration in support of motion for preliminary approval [.4].	0.1	\$ 500.00	\$ 50.00
5/23/2019 BHC	Worked on motion for preliminary approval and documents supporting same; reviewed and approved for filing [1.2]. Exchanged emails with Mr. Vance and co-counsel regarding same [2].	0.6	\$ 500.00	\$ 300.00
5/24/2019 BHC	Email to proposed settlement administrator regarding motion for preliminary approval; reviewed data issues related to same [.2].	1.4	\$ 500.00	\$ 700.00
5/28/2019 BHC	Exchanged emails with [REDACTED] [.1]; telephone call from counsel for BBSI regarding same [.1]. Prepared for hearing on motion for preliminary approval [.8]. Exchanged emails with settlement administrator regarding class data [.3]. Addressed questions from staff regarding [REDACTED] [.2].	0.2	\$ 500.00	\$ 100.00
5/29/2019 BHC	Wrote outline for hearing on motion for preliminary approval [.8]. Reviewed cases and case file in preparation for preliminary approval hearing [2.5].	1.3	\$ 500.00	\$ 650.00
6/13/2019 BHC	Travel to and from hearing on motion for preliminary approval of settlement [5.4]. Prepared for hearing on motion for preliminary approval of settlement [1.5]. Court appearance for motion for preliminary approval of settlement [.6].	3.3	\$ 500.00	\$ 1,650.00
6/26/2019 BHC	Checked docket for preliminary approval order; email to staff [REDACTED] [REDACTED]; sent same to administrator and all counsel [.2]. Exchanged emails with co-counsel regarding [REDACTED] [.1].	7.5	\$ 500.00	\$ 3,750.00
6/27/2019 BHC	Email to settlement administrator regarding reminder postcard [.1]. Worked on reminder email to absent class members regarding claims deadline [3]; email to administrator regarding same [.1].	0.2	\$ 500.00	\$ 100.00
6/28/2019 BHC		0.1	\$ 500.00	\$ 50.00
7/24/2019 BHC		0.1	\$ 500.00	\$ 50.00
8/6/2019 BHC		0.4	\$ 500.00	\$ 200.00
8/7/2019 BHC		109.5	\$ 49,387.50	
8/8/2019 BHC				

Professional: Blythe Chandler

Professional: Bradford Kinsey

8/26/2015 BKK	Reviewed, revised and finalized complaint; prepared summons and civil cover sheet; arranged new case filing.	1.7	\$	225.00	\$	382.50
9/29/2015 BKK	Reviewed and finalized pro hac vice applications for E. Michelle Drake and John Albanese; arranged filing and service.	0.5	\$	225.00	\$	112.50
11/3/2015 BKK	Amended master caption; prepared draft and finalized TMLG notice of firm name change; arranged filing and service.	0.4	\$	225.00	\$	90.00
4/5/2016 BKK	Reviewed E. Michelle Drake and John Albanese address change [1.1]; amended master caption [1.1].	0.2	\$	225.00	\$	45.00
6/15/2017 BKK	Register Murray for electronic service and filing; prepared drafts of master caption and declaration of service; reviewed, revised and finalized Drake and Albanese pro hac vice motions and supporting documents.	1.4	\$	225.00	\$	315.00
6/27/2017 BKK	Reviewed and finalized Plaintiff's first sets of interrogatories and requests for production; finalized Albanese and Drake pro hac vice motions and supporting documents; arranged filing and service.	1.1	\$	225.00	\$	247.50
7/3/2017 BKK	Arranged delivery of Drake and Albanese pro hac vice motions to WSBA.	0.2	\$	225.00	\$	45.00
7/18/2017 BKK	Reviewed and revised response to motion to change venue; prepared draft of Terrell supporting declaration, proposed order, index of Non-Washington authorities and declaration of service.	2.6	\$	225.00	\$	585.00
7/19/2017 BKK	Reviewed, revised and finalized response to motion to change venue and supporting pleadings; arranged filing and service; arranged delivery of working copies to chambers.	1.1	\$	225.00	\$	247.50
9/18/2017 BKK	Prepared draft of Notice of Assignment to Judicial Department and Setting Scheduling Conference date; prepared declaration of service; prepared transmittal letter to Clark County Superior Court Clerk; arranged service on opposing counsel.	0.6	\$	225.00	\$	135.00
10/12/2017 BKK	Reviewed, revised and finalized Drake and Albanese pro hac vice ex parte motions; arranged payment; drafted transmittal letter to Clark County Superior Court clerk; arranged service by email.	1.4	\$	225.00	\$	315.00
5/1/2018 BKK	Reviewed and revised notice of disqualification and supporting proposed order.	0.6	\$	225.00	\$	135.00
5/2/2018 BKK	Prepared draft and finalized Hashmall pro hac vice motion and proposed order; telephone conference with court; telephone conference with bailiff; finalized and arranged service on opposing counsel.	2.2	\$	225.00	\$	495.00
5/4/2018 BKK	Arranged copy of Hashmall pro hac vice motion; copy and check request to WSBA for payment.	0.2	\$	225.00	\$	45.00
10/5/2018 BKK	Prepared drafts of motion for class certification, supporting Terrell declaration, proposed order and citation.	0.4	\$	225.00	\$	90.00
12/10/2018 BKK	Reviewed and revised Plaintiffs' mediation statement.	0.2	\$	225.00	\$	45.00
12/13/2018 BKK	Reviewed and revised mediation brief; assembled exhibits; prepared cover page.	1.4	\$	225.00	\$	315.00
12/14/2018 BKK	Prepared draft of CR 2A agreement.	0.6	\$	225.00	\$	135.00
12/17/2018 BKK	Reviewed, revised and finalized supplemental mediation letter to Judge Kallas; arranged delivery by email.	0.6	\$	225.00	\$	135.00
12/21/2018 BKK	Reviewed, revised and finalized discovery meet and confer letter to opposing counsel; arranged delivery by email.	0.3	\$	225.00	\$	67.50
2/7/2019 BKK	Reviewed and revised second joint notice of proposed settlement and stipulation and proposed order striking hearing.	0.4	\$	225.00	\$	90.00
2/11/2019 BKK	Reviewed and revised settlement agreement.	0.1	\$	225.00	\$	22.50
4/8/2019 BKK	Reviewed and revised stipulated motion for entry of order; prepared draft of proposed order.	0.6	\$	225.00	\$	135.00
5/20/2019 BKK	Prepared draft of Terrell notice of unavailability.	0.2	\$	225.00	\$	45.00
7/8/2019 BKK	Researched status of preliminary approval order; telephone correspondence with judge's bailiff regarding same.	0.7	\$	225.00	\$	157.50
7/24/2019 BKK	Research regarding order granting preliminary approval; telephone correspondence with court clerk regarding same.	0.4	\$	225.00	\$	90.00
Professional: Bradford Kinsey		20.1			\$	4,522.50
Professional: Britt Glass						
7/3/2018 BG	conference re [REDACTED] [0.4]; coordinated travel to status conference [0.2].	0.6	\$	320.00	\$	192.00
7/4/2018 BG	Prepared for status conference [1.0].	1	\$	320.00	\$	320.00

7/5/2018	BG	Prepared for status conference [4.0]; [REDACTED] conference re [REDACTED] [0.5]; coordinated with staff re [REDACTED] [0.7]; exchanged emails with co-counsel re [REDACTED] [0.3]; revised proposed scheduling orders [0.4].	5.9	\$ 320.00	\$ 1,888.00
7/6/2018	BG	Travel to status conference in Clark County [3.0]; attended status conference [1.5]; [REDACTED] conference re [REDACTED] [0.2]; travel from status conference in Clark County [3.0]; coordinated drafting of stipulated scheduling agreement and reviewed same [0.2]. Revised scheduling agreement [0.1]; sent email to co-counsel re [REDACTED] [0.1].	7.9	\$ 320.00	\$ 2,528.00
7/9/2018	BG		0.2	\$ 320.00	\$ 64.00
9/17/2018	BG	Legal research re [REDACTED] [0.6]. Personal conference regarding [REDACTED]	0.6	\$ 320.00	\$ 192.00
5/16/2019	BG	[.1].	0.1	\$ 375.00	\$ 37.50
5/20/2019	BG	Revised motion for preliminary approval.	2.9	\$ 375.00	\$ 1,087.50
5/20/2019	BG	Worked on motion for preliminary approval [.3].	0.3	\$ 375.00	\$ 112.50
5/21/2019	BG	Worked on motion for preliminary approval [.5].	0.5	\$ 375.00	\$ 187.50
7/15/2019	BG	Exchanged emails with co-counsel regarding [REDACTED] [.1]; exchanged emails with staff regarding [REDACTED] [.1]. Professional: Britt Glass	0.2 20.2	\$ 375.00 \$	75.00 6,684.00
Professional: Elizabeth Adams					
7/21/2016	EAA	Reviewed motion for judgment on the pleadings and complaint in preparation for drafting response to motion.	1.1	\$ 350.00	\$ 385.00
7/22/2016	EAA	Worked on drafting response to motion for judgment on the pleadings.	2.2	\$ 350.00	\$ 770.00
7/25/2016	EAA	Worked on drafting response to motion for judgment on the pleadings.	2.8	\$ 350.00	\$ 980.00
7/27/2016	EAA	Drafted email regarding [REDACTED]. Worked on research regarding [REDACTED] [0.8]; personal conference regarding [REDACTED] [0.3].	0.3	\$ 350.00	\$ 105.00
7/28/2016	EAA	Personal conference regarding [REDACTED]	1.1	\$ 350.00	\$ 385.00
7/29/2016	EAA	[REDACTED]	0.2	\$ 350.00	\$ 70.00
8/1/2016	EAA	Drafted email regarding [REDACTED] s.	0.3	\$ 350.00	\$ 105.00
8/2/2016	EAA	Drafted argument regarding remand due to lack of subject matter jurisdiction. Commenced review of co-counsel's [REDACTED]	1.5	\$ 350.00	\$ 525.00
8/4/2016	EAA	[REDACTED]	0.4	\$ 350.00	\$ 140.00
8/5/2016	EAA	Revised draft of response to motion to dismiss.	1.8	\$ 350.00	\$ 630.00
8/8/2016	EAA	Proofread and prepared response brief for filing.	1.5	\$ 350.00	\$ 525.00
1/16/2019	EAA	Personal conferences regarding [REDACTED]. Professional: Elizabeth Adams	0.3 13.5	\$ 425.00 \$	127.50 4,747.50
Professional: Erika Nusser					
8/25/2015	ELN	Emails regarding complaint [.2] Professional: Erika Nusser	0.2 0.2	\$ 450.00 \$	90.00 90.00
Professional: Hannelore Ohaus					
8/28/2015	HKO	Worked on docketing.	0.8	\$ 150.00	\$ 120.00
9/21/2015	HKO	Worked on docketing.	0.2	\$ 150.00	\$ 30.00
12/3/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
12/10/2015	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
1/14/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
1/15/2016	HKO	Worked on docketing.	0.3	\$ 150.00	\$ 45.00
6/16/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
7/22/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
9/28/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
11/10/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
12/1/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
12/1/2016	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
1/5/2017	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00
3/8/2017	HKO	Worked on docketing.	0.1	\$ 150.00	\$ 15.00

3/31/2017	HKO	Worked on docketing.	0.1	\$	150.00	\$	15.00
4/21/2017	HKO	Worked on docketing.	0.1	\$	150.00	\$	15.00
4/21/2017	HKO	Worked on docketing.	0.3	\$	150.00	\$	45.00
5/3/2017	HKO	Worked on docketing.	0.1	\$	150.00	\$	15.00
5/5/2017	HKO	Worked on docketing.	0.1	\$	150.00	\$	15.00
5/12/2017	HKO	Worked on docketing.	0.1	\$	150.00	\$	15.00
5/16/2017	HKO	Worked on docketing.	0.2	\$	150.00	\$	30.00
5/17/2017	HKO	Worked on docketing.	0.1	\$	150.00	\$	15.00

Professional: Hannelore Ohaus 3.5 \$ 525.00

Professional: Heather Brown

6/11/2018	HB	Worked on drafting, filing, serving and dropping off at Fed Ex notice of appearance for Jennifer Murray [1.0]; worked on drafting and emailing electronic filing registration for Jennifer Murray [.3].	1.3	\$	225.00	\$	292.50
6/13/2018	HB	Prepare docs in support of our opposition to motion to certify summary judgment order for interlocutory appeal [.9].	0.9	\$	225.00	\$	202.50
7/5/2018	HB	Worked on creating multiple proposed scheduling orders for Friday's hearing [1.8].	1.8	\$	225.00	\$	405.00
7/6/2018	HB	Worked on creating stipulated scheduling order [.1].	0.1	\$	225.00	\$	22.50
7/15/2019	HB	Searched docket for preliminary approval order [.1].	0.1	\$	225.00	\$	22.50

Professional: Heather Brown 4.2 \$ 945.00

Professional: Holly Rota

7/22/2016	HMR	Worked on plaintiff's response to defendant's motion for judgment on the pleadings.	0.4	\$	225.00	\$	90.00
8/8/2016	HMR	Worked on and finalized plaintiff's response to defendant's motion for judgment on the pleadings; electronically filed same.	2.1	\$	225.00	\$	472.50
7/18/2017	HMR	Pulled copies of various pleadings; saved to PL; emailed to Ms. Murray. Worked on and finalized plaintiff's opposition to defendant's motion for summary judgment, affidavit of John G. Albanese in support of opposition with exhibits and declaration of service; electronically filed same; emailed same to counsel for all parties.	0.5	\$	225.00	\$	112.50
11/30/2017	HMR	Refiled plaintiffs opposition to defendant's motion for summary judgment and declaration of service.	0.8	\$	225.00	\$	180.00
12/1/2017	HMR	Worked on and finalized reply in support of plaintiff's motion to compel and declaration of service; electronically filed same; emailed same to counsel for all parties.	0.3	\$	225.00	\$	67.50
12/6/2017	HMR	Worked on amended citation and declaration of service; electronically filed same; emailed same to counsel for all parties.	0.5	\$	225.00	\$	112.50
12/7/2017	HMR	Worked on and finalized notice of appearance for Blythe H. Chandler and declaration of service; mailed same to court for filing; emailed same to counsel for all parties; worked on and finalized plaintiffs' opposition to defendant motion to certify summary judgment order for interlocutory appeal, declaration of Beth Terrell in support of motion, proposed order and declaration of service; electronically filed same; emailed same to counsel for all parties [2].	0.5	\$	225.00	\$	112.50
6/13/2018	HMR	Pulled and ordered various pleadings from clerk's epass.	2	\$	225.00	\$	450.00
6/19/2018	HMR	Worked on and finalized joint status report and declaration of service; electronically filed same; emailed same to counsel for all parties; mailed paper version to court.	0.5	\$	225.00	\$	112.50
6/29/2018	HMR	Worked on and finalized notice of appearance for Brittany Glass, declaration of service, letter to clerk enclosing same; mailed same; emailed same to counsel for all parties.	1	\$	225.00	\$	225.00
7/3/2018	HMR	Saved pleadings to PL [.2]; pulled docket [.2]	0.4	\$	225.00	\$	90.00
7/10/2018	HMR	Worked on and finalized stipulated supplemental scheduling agreement and declaration of service; electronically filed same; emailed same to counsel for all parties.	0.4	\$	225.00	\$	90.00
7/11/2018	HMR	Searched court docket for signed scheduling order; called Clark County clerk's office for copy of signed scheduling order.	0.5	\$	225.00	\$	112.50
7/12/2018	HMR	Worked on pulling mediation exhibits.	0.3	\$	225.00	\$	67.50
12/12/2018	HMR		0.5	\$	225.00	\$	112.50
1/2/2019	HMR	Coordinated with ABC Legal regarding service addresses for subpoenas.	0.3	\$	225.00	\$	67.50
1/3/2019	HMR	Pulled proofs of service for [REDACTED].	0.2	\$	225.00	\$	45.00
1/4/2019	HMR	Emailed signed civil rule 2A agreement to counsel for all parties.	0.1	\$	225.00	\$	22.50

1/7/2019	HMR	Worked on notice of settlement.	0.2	\$	225.00	\$	45.00
1/9/2019	HMR	Worked on settlement agreement.	1	\$	225.00	\$	225.00
		Pulled proofs of service for [REDACTED] [REDACTED] [REDACTED]; worked on settlement agreement; emailed to counsel for all parties [.3]	0.6	\$	225.00	\$	135.00
1/10/2019	HMR		0.3	\$	225.00	\$	67.50
1/24/2019	HMR	Worked on and finalized settlement agreement with exhibits. Worked on second joint notice regarding settlement and stipulation and proposed order regarding class member data.	0.4	\$	225.00	\$	90.00
2/5/2019	HMR	Worked on and finalized second joint notice of settlement and request for stay, declaration of service and proposed order; electronically filed same; emailed same to counsel for all parties.	0.4	\$	225.00	\$	90.00
2/7/2019	HMR	Worked on declaration of Beth E. Terrell in support of plaintiff's motion for preliminary approval of class action settlement.	0.3	\$	225.00	\$	67.50
5/24/2019	HMR						
		Worked on and finalized plaintiff's motion for preliminary approval of class action settlement, declaration of Beth E. Terrell in support of same, declaration of E. Michelle Drake in support of same, proposed order, citation and declaration of service; electronically filed same; emailed same to counsel for all parties [2.5]; coordinated with the Court regarding new assigned judge and scheduling hearing [.4].	2.9	\$	225.00	\$	652.50
5/28/2019	HMR	Printed and mailed judges' working copies of plaintiff's motion for preliminary approval of class action settlement.	0.5	\$	225.00	\$	112.50
5/29/2019	HMR						
		Worked on and finalized notice of unavailability for Ms. Chandler and Ms. Terrell, declaration of service, letter to clerk enclosing same.	1	\$	225.00	\$	225.00
5/30/2019	HMR		18.9	\$		\$	4,252.50
		Professional: Holly Rota					
Professional: Jennifer Boschen							
7/18/2017	JJB	Worked on response to motion to transfer venue.	1.2	\$	275.00	\$	330.00
8/21/2018	JJB	Processed defendant's production.	0.2	\$	275.00	\$	55.00
9/4/2018	JJB	Downloaded and logged plaintiff's production.	0.4	\$	275.00	\$	110.00
		Downloaded and processed defendant's production; updated production log.	0.8	\$	275.00	\$	220.00
10/15/2018	JJB	Loaded defendant's production in document database; updated production log.	0.4	\$	275.00	\$	110.00
10/29/2018	JJB						
		Filed and logged third party productions; correspondence regarding same.	0.2	\$	295.00	\$	59.00
3/27/2019	JJB						
		Downloaded third party production; updated production and subpoena tracking logs; prepared secure file share to Mr. Hartmann.	0.6	\$	295.00	\$	177.00
3/28/2019	JJB	Updated subpoena tracking log.	0.1	\$	295.00	\$	29.50
4/1/2019	JJB	Correspondence regarding data for class list; reviewed third party data in preparation for data merge.	0.3	\$	295.00	\$	88.50
4/11/2019	JJB	Worked on class list data merge and data cleansing.	4.4	\$	295.00	\$	1,298.00
4/11/2019	JJB		0.6	\$	295.00	\$	177.00
5/28/2019	JJB	Processed third party data for class notice.	0.1	\$	295.00	\$	29.50
5/29/2019	JJB	Personal conference regarding class data.	1.5	\$	295.00	\$	442.50
6/10/2019	JJB	Worked on data analysis of class lists from third parties.	1.5	\$	295.00	\$	442.50
6/17/2019	JJB	Worked on data analysis.	2.4	\$	295.00	\$	708.00
6/18/2019	JJB	Finalized class list merge and cleanup; drafted summary regarding same.	0.4	\$	295.00	\$	118.00
6/18/2019	JJB	Personal conference regarding class data.	2.4	\$	295.00	\$	708.00
6/20/2019	JJB	Continued consolidating class lists.	1.4	\$	295.00	\$	413.00
6/24/2019	JJB	Worked on preparing class data; summarized same; prepared output for same.	1.3	\$	295.00	\$	383.50
6/26/2019	JJB	Prepared class data for notice provider; correspondence regarding same.	0.3	\$	295.00	\$	88.50
7/2/2019	JJB	Reviewed correspondence regarding preliminary approval and case deadlines; reviewed class notice.	0.1	\$	295.00	\$	29.50
7/8/2019	JJB	Reviewed court filings.	0.5	\$	295.00	\$	147.50
7/15/2019	JJB	Reviewed class database; correspondence with claims administrator regarding same.	0.9	\$	295.00	\$	265.50
7/15/2019	JJB	Telephone call to notice provider regarding class data; continued analyzing class data; prepared output for notice provider; correspondence regarding same.	22	\$		\$	6,430.00
		Professional: Jennifer Boschen					

Professional: Jennifer Murray

4/20/2017	JRM	Revised privilege motion[3.4].	3.4	\$ 600.00	\$ 2,040.00
4/27/2017	JRM	Reviewed opposition to motion to dismiss[0.5].	0.5	\$ 600.00	\$ 300.00
7/14/2017	JRM	Reviewed and revised opposition to motion to transfer venue[0.2]; email correspondence regarding same[0.1].	0.3	\$ 600.00	\$ 180.00
7/17/2017	JRM	Worked on opposition to motion to transfer venue[1.4]; continued to work on same[0.3].	1.7	\$ 600.00	\$ 1,020.00
7/18/2017	JRM	Revised opposition to transfer venue[1.0]; worked on supporting documents for same[0.5]; email correspondence regarding same[0.1]; reviewed and revised brief[0.3].	1.9	\$ 600.00	\$ 1,140.00
7/19/2017	JRM	Reviewed and revised opposition motion[0.2]; reviewed and revised declaration[0.1].	0.3	\$ 600.00	\$ 180.00
12/5/2017	JRM	Revised reply brief[1.2].	1.2	\$ 600.00	\$ 720.00
5/2/2018	JRM	Analyzed issues regarding [REDACTED] [0.1]; email correspondence regarding same[0.1].	0.2	\$ 600.00	\$ 120.00
6/11/2018	JRM	Reviewed motion to certify for interlocutory review[0.2]; reviewed rules regarding response deadlines[0.1]; email correspondence regarding same[0.1]; worked on interlocutory appeal issue[0.2].	0.6	\$ 600.00	\$ 360.00
6/12/2018	JRM	Reviewed and revised response to motion to certify[0.5]; followed up with same[0.2].	0.7	\$ 600.00	\$ 420.00
6/13/2018	JRM	Worked on opposition to motion to certify[0.5]; continued to work on same[0.3]; revised brief[2.2]; continued to revise same[0.5].	3.5	\$ 600.00	\$ 2,100.00
12/10/2018	JRM	Reviewed and revised mediation letter[0.1]; analyzed issues regarding same[0.1].	0.2	\$ 600.00	\$ 120.00
5/28/2019	JRM	Revised Terrell declaration[0.3].	0.3	\$ 700.00	\$ 210.00
Professional: Jennifer Murray			14.8	\$	8,910.00

Professional: Jessica Langsted

6/13/2018	JAL	Worked on case management binder.	1.3	\$ 100.00	\$ 130.00
7/6/2018	JAL	Worked on docketing.	0.1	\$ 100.00	\$ 10.00
7/10/2018	JAL	Worked on docketing.	0.1	\$ 100.00	\$ 10.00
7/12/2018	JAL	Worked on docketing.	0.9	\$ 100.00	\$ 90.00
8/2/2018	JAL	Worked on docketing.	0.1	\$ 100.00	\$ 10.00
8/6/2018	JAL	Worked on docketing.	0.2	\$ 100.00	\$ 20.00
8/14/2018	JAL	Worked on docketing.	0.1	\$ 100.00	\$ 10.00
9/14/2018	JAL	Worked on deposition preparation.	0.4	\$ 100.00	\$ 40.00
9/17/2018	JAL	Worked on deposition preparation.	0.4	\$ 100.00	\$ 40.00
9/28/2018	JAL	Worked on docketing.	0.1	\$ 100.00	\$ 10.00
10/23/2018	JAL	Worked on docketing.	0.3	\$ 100.00	\$ 30.00
11/8/2018	JAL	Worked on docketing.	0.3	\$ 100.00	\$ 30.00
12/13/2018	JAL	Worked on docketing.	0.2	\$ 100.00	\$ 20.00
12/21/2018	JAL	Worked subpoenas to vendors.	7.9	\$ 100.00	\$ 790.00
12/26/2018	JAL	Worked on docketing.	0.1	\$ 100.00	\$ 10.00
12/28/2018	JAL	Worked on vendor subpoenas.	0.6	\$ 100.00	\$ 60.00
1/2/2019	JAL	Worked on subpoena tracking spreadsheet.	0.4	\$ 100.00	\$ 40.00
1/3/2019	JAL	Worked on subpoena tracking spreadsheet.	0.6	\$ 100.00	\$ 60.00
1/4/2019	JAL	Worked on calls to subpoenaed vendors.	0.4	\$ 100.00	\$ 40.00
1/10/2019	JAL	Worked on calling subpoena recipients [1.0]; worked on updating subpoena tracking chart [0.4].	1.4	\$ 100.00	\$ 140.00
1/23/2019	JAL	Worked on docketing [0.1].	0.1	\$ 100.00	\$ 10.00
2/5/2019	JAL	Worked on drafting joint subpoenas.	0.2	\$ 100.00	\$ 20.00
2/6/2019	JAL	Worked on drafting joint subpoenas [2.6].	2.6	\$ 100.00	\$ 260.00
2/8/2019	JAL	Worked on docketing [0.2].	0.2	\$ 100.00	\$ 20.00
2/26/2019	JAL	Worked on downloading documents [0.2]; worked on drafting subpoenas [0.8].	1	\$ 100.00	\$ 100.00
2/27/2019	JAL	Worked on drafting subpoenas [6.8].	6.8	\$ 100.00	\$ 680.00
2/28/2019	JAL	Worked on drafting subpoena [0.8]; worked on vendor tracking spreadsheet [0.2]; worked on docketing [0.1].	1.1	\$ 100.00	\$ 110.00
3/5/2019	JAL	Worked on correspondence to subpoena response [0.4]; worked on subpoena tracking chart [0.3].	0.7	\$ 100.00	\$ 70.00
3/6/2019	JAL	Worked on subpoena tracking [0.2].	0.2	\$ 100.00	\$ 20.00
3/7/2019	JAL	Worked on subpoena tracking and communication [2.3].	2.3	\$ 100.00	\$ 230.00
3/8/2019	JAL	Worked on subpoena tracking and communication [2.1].	2.1	\$ 100.00	\$ 210.00
3/11/2019	JAL	Worked on subpoena tracking spreadsheet [0.7].	0.7	\$ 100.00	\$ 70.00

3/12/2019	JAL	Worked on subpoena tracking spreadsheet and communication [1.3].	1.3	\$	100.00	\$	130.00
3/13/2019	JAL	Worked on subpoena tracking [0.6].	0.6	\$	100.00	\$	60.00
3/14/2019	JAL	Worked on drafting subpoena [0.5].	0.5	\$	100.00	\$	50.00
3/15/2019	JAL	Worked on subpoena tracking chart and communication [0.6].	0.6	\$	100.00	\$	60.00
3/18/2019	JAL	Worked on subpoena tracking chart and communication [1.5].	1.5	\$	100.00	\$	150.00
3/19/2019	JAL	Worked on subpoena tracking and communication [0.5].	0.5	\$	100.00	\$	50.00
3/29/2019	JAL	Worked on subpoena tracking chart [0.3].	0.3	\$	100.00	\$	30.00
4/2/2019	JAL	Worked on subpoena tracking spreadsheet [0.7]; worked on preparing subpoena [0.3].	1	\$	100.00	\$	100.00
4/8/2019	JAL	Worked on subpoena correspondence [0.2].	0.2	\$	200.00	\$	40.00
4/9/2019	JAL	Worked on downloading subpoena response [0.4]; worked on drafting subpoenas [0.9]; worked on reviewing responses to subpoena [0.5].	1.8	\$	200.00	\$	360.00
5/6/2019	JAL	Worked on sending ShareFile links regarding subpoena response [0.3].	0.3	\$	200.00	\$	60.00
5/8/2019	JAL	Worked on providing sharefile link to upload response to subpoena [0.1].	0.1	\$	200.00	\$	20.00
5/9/2019	JAL	Worked on downloading subpoena response and updating production log [0.3].	0.3	\$	200.00	\$	60.00
5/15/2019	JAL	Worked on updating subpoena tracking log [0.1].	0.1	\$	200.00	\$	20.00
5/20/2019	JAL	Worked on preparing subpoena for service [0.9].	0.9	\$	200.00	\$	180.00
5/24/2019	JAL	Worked on sending sharefile link [0.1].	0.1	\$	200.00	\$	20.00
5/29/2019	JAL	Worked on docketing [0.2].	0.2	\$	200.00	\$	40.00
5/30/2019	JAL	Email to employment investigative services regarding subpoena [0.2].	0.2	\$	200.00	\$	40.00
5/31/2019	JAL	Downloaded and saved subpoena response [0.3].	0.3	\$	200.00	\$	60.00
6/4/2019	JAL	Worked on updating production log and subpoena tracking spreadsheet [0.3]; worked on docketing [0.1].	0.4	\$	200.00	\$	80.00
6/13/2019	JAL	Worked on updating subpoena tracking log [0.2].	0.2	\$	200.00	\$	40.00
6/14/2019	JAL	Worked on downloading subpoena response, updating production log and subpoena log [0.3].	0.3	\$	200.00	\$	60.00
6/25/2019	JAL	Worked on hearing notebook [0.2].	0.2	\$	200.00	\$	40.00
6/26/2019	JAL	Worked on calculating tentative deadlines [0.5].	0.5	\$	200.00	\$	100.00
7/2/2019	JAL	Worked on docketing [0.1].	0.1	\$	200.00	\$	20.00
7/25/2019	JAL	Worked on docketing [1.1].	1.1	\$	200.00	\$	220.00
Professional: Jessica Langsted			47.5			\$	5,480.00
Professional: Jodi Nuss							
10/8/2018	JN	Reviewed email from Ms. Xiong [REDACTED] [1]; Retrieved documents from FTP server.[1]; Updated production log.[1]	0.3	\$	275.00	\$	82.50
10/8/2018	JN	Reviewed production documents to determine how productions should be logged and loaded.[2]; Created new case database in eClipse and created known document tags and added users.[2]; Prepared data for import into eClipse.[1] Prepared email regarding production dates.[1]	0.6	\$	275.00	\$	165.00
10/8/2018	JN	Ingested images from plaintiffs productions.[1]; Ingested images from BBSI's first production.[1]; Applied production tags to each.[1]; Ingested load files for BBSI's second production.[2]; Reviewed error log and began troubleshooting production load issues.[4]; Prepared email [REDACTED] [1]	1	\$	275.00	\$	275.00
10/9/2018	JN	Assigned new bates numbers to defendant's first production to ensure consistency in eClipse database.[1]; Removed erroneously numbered first production from database and commenced import and OCR of fixed documents.[2]; Forced import of load file without missing natives.[1]; Initiated OCR processing for same and added production tags to database.[1]; Prepared email confirming production load is complete.[1]	0.6	\$	275.00	\$	165.00
Professional: Jodi Nuss			2.5			\$	687.50
Professional: Kaylan Lovrovich							
8/20/2015	KML	Reviewed and edited complaint.	1	\$	325.00	\$	325.00
8/21/2015	KML	Reviewed and revised complaint.	0.8	\$	325.00	\$	260.00
8/26/2015	KML	Reviewed complaint from co-counsel [5]; finalized the same for filing [5].	1	\$	325.00	\$	325.00
12/11/2015	KML	Reviewed draft ESI agreement and opposition to Motion to Stay.	0.7	\$	325.00	\$	227.50
12/13/2015	KML	Revised Opposition to Motion to Stay from co-counsel.	0.3	\$	325.00	\$	97.50

12/16/2015 KML	Revised Opposition to Motion for Protective Order and to Quash Subpoenas.	0.6	\$ 325.00	\$	195.00
12/31/2015 KML	Reviewed co-counsel's draft ESI agreement.	0.7	\$ 325.00	\$	227.50
1/4/2016 KML	Reviewed Defendant's response to Plaintiff's interrogatories and requests for production.	0.5	\$ 325.00	\$	162.50
Professional: Kaylan Lovrovich		5.6		\$	1,820.00
Professional: Rachel Hoover					
10/14/2015 REH	Worked on docketing.	0.1	\$ 275.00	\$	27.50
10/31/2017 REH	Re-filed declaration of service in support of citation; telephone conference with Clark County clerk regarding same.	0.5	\$ 275.00	\$	137.50
Professional: Rachel Hoover		0.6		\$	165.00
Professional: Razel Agustino					
10/15/2015 RDA	Worked on docketing.	0.1	\$ 125.00	\$	12.50
1/14/2016 RDA	Worked on docketing.	0.1	\$ 125.00	\$	12.50
7/22/2016 RDA	Worked on docketing.	0.1	\$ 125.00	\$	12.50
9/29/2016 RDA	Worked on docketing.	0.1	\$ 125.00	\$	12.50
11/10/2016 RDA	Worked on docketing.	0.1	\$ 125.00	\$	12.50
1/5/2017 RDA	Worked on docketing.	0.1	\$ 125.00	\$	12.50
Professional: Razel Agustino		0.6		\$	75.00
Professional: Samuel Levy					
6/1/2017 STL	Worked on docketing.	0.3	\$ 200.00	\$	60.00
6/7/2017 STL	Worked on docketing.	0.1	\$ 200.00	\$	20.00
6/13/2017 STL	Worked on docketing.	0.4	\$ 200.00	\$	80.00
6/27/2017 STL	Worked on docketing.	0.7	\$ 200.00	\$	140.00
6/30/2017 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
7/17/2017 STL	Worked on docketing.	0.1	\$ 200.00	\$	20.00
7/18/2017 STL	Worked on docketing.	0.3	\$ 200.00	\$	60.00
9/12/2017 STL	Worked on docketing.	0.1	\$ 200.00	\$	20.00
10/31/2017 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
11/14/2017 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
11/30/2017 STL	Worked on docketing.	0.8	\$ 200.00	\$	160.00
12/1/2017 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
12/7/2017 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
2/2/2018 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
4/26/2018 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
4/27/2018 STL	Worked on docketing.	0.1	\$ 200.00	\$	20.00
5/1/2018 STL	Worked on docketing.	0.1	\$ 200.00	\$	20.00
5/7/2018 STL	Worked on docketing.	0.2	\$ 200.00	\$	40.00
6/12/2018 STL	Worked on docketing.	0.7	\$ 200.00	\$	140.00
6/14/2018 STL	Worked on docketing.	0.1	\$ 200.00	\$	20.00
Professional: Samuel Levy		5.4		\$	1,080.00
Professional: Seth Dawson					
1/16/2019 SD	Reviewed Settlement Agreement [0.5]; drafted long form and post card notices of settlement [3.5].	4	\$ 275.00	\$	1,100.00
Professional: Seth Dawson		4		\$	1,100.00
Total		305		\$	104,459.00

Exhibit D

Nichols Kaster PLLP**Costs for Dougherty v. BBSI**

Date	Work_Description_(m)	Hours	Rate	Amount
	Check issued to E Michelle Drake - Flight and rental car			
8/3/2015	reimbursement	0	0	\$400.71
	Check issued to E Michelle Drake - Printing and hotel			
8/10/2015	reimbursement	0	0	\$160.64
	Check issued to E Michelle Drake - Parking and mileage			
8/11/2015	reimbursement	0	0	\$12.72
9/10/2015	Westlaw	0	0	\$100.00
	Check issued to Metro Legal Services - Courier service - Barrett			
9/22/2015	Business Services Inc	0	0	\$125.00
11/24/2015	PACER	0	0	\$1.10
12/15/2015	Check issued to Metro Legal Services - Courier service - QuickSIUS	0	0	\$130.00
12/17/2015	Check issued to Metro Legal Services - Courier service - QuickSIUS	0	0	\$175.00
	Check issued to Federal Express - Mpls weekly shipping - Hon			
12/23/2015	Thomas Zilly	0	0	\$19.09
12/31/2015	Photocopies	41	0.25	\$10.25
12/31/2015	Postage	0	0	\$3.01
1/7/2016	Westlaw	0	0	\$100.00
1/12/2016	Check issued to LoopUp - JGA phone conference	0	0	\$6.75
1/27/2016	PACER	0	0	\$11.50
				\$1,255.77

Berger | Montague PC

ATTORNEYS AT LAW

Expense Activity

1/1/1900 - 8/21/2019

Expense Code/Description Client/Matter/Originating Timekeeper				Date	Description	Check Number	Recorded Amount
16323 BBSI (DOUGHERTY)							
00000					BBSI (DOUGHERTY)	MXD	
	40				Telephone		12.40
	41				Travel		6,067.84
	42				Reproduction costs		7.20
	42B				Reproduction costs Print		135.00
	42C				Reproduction costs Scans		13.40
	42D				COLOR PRINTS		6.90
	42E				Convert To Tiff		79.09
	42F				OCR		27.15
	42H				Kaleidoscope Database Hosting		390.04
	43				Transcripts		100.00
	44				Postage		14.91
	46				Office Expense		19.67
	47				Filing & Misc. Fees		425.38
	48				Commercial Copying & Printing		18.56
	49				Special Copy		4.50
	55				Computer Research		8,696.35
	59				Delivery & freight		124.98
	63				Advertising		84.85
	80				Faxes		3.00
	83				Docusign		4.96
	87				Mediation Fees		2,768.75
Total 00000 BBSI (DOUGHERTY)							19,004.93
Total 16323 BBSI (DOUGHERTY)							19,004.93
Report Totals							19,004.93

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Air Fare						
316443	06/15/2018		Air fare	1.00	416.41	416.41
318047	07/06/2018		Air fare	1.00	456.80	456.80
347681	06/28/2019		Air fare	1.00	196.60	196.60
				Component: Air Fare		
				3.00		1,069.81
Component: Courier/PS						
332552	12/28/2018		Courier/process server	1.00	167.50	167.50
332555	12/31/2018		Courier/process server	1.00	167.50	167.50
336121	01/02/2019		Courier/Process Server	1.00	167.50	167.50
336122	01/03/2019		Courier/Process Server	1.00	167.50	167.50
336123	01/04/2019		Courier/Process Server	1.00	167.50	167.50
336127	01/09/2019		Courier/Process Server	1.00	167.50	167.50
340457	03/05/2019		Courier/Process Server	1.00	502.50	502.50
342563	03/06/2019		Courier/Process Server	1.00	335.00	335.00
342564	03/08/2019		Courier/Process Server	1.00	335.00	335.00
342565	03/11/2019		Courier/Process Server	1.00	502.50	502.50
342567	03/13/2019		Courier/Process Server	1.00	502.50	502.50
342571	03/18/2019		Courier/Process Server	1.00	167.50	167.50
342573	03/19/2019		Courier/Process Server	1.00	502.50	502.50

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
342579	03/26/2019		Courier/Process Server	1.00	167.50	167.50
342580	03/29/2019		Courier/Process Server	1.00	25.00	25.00
346246	05/07/2019		Courier/Process Server	1.00	125.00	125.00
346252	05/17/2019		Courier/Process Server	1.00	125.00	125.00
Component: Courier/PS				17.00		4,295.00
Component: FedEx						
294134	09/18/2017		FedEx Charges	1.00	19.89	19.89
294137	09/19/2017		FedEx Charges	1.00	19.89	19.89
296685	10/13/2017		FedEx Charges	1.00	19.56	19.56
298798	11/14/2017		FedEx Charges	1.00	35.39	35.39
315712	05/09/2018		FedEx Charges	1.00	20.79	20.79
317755	06/11/2018		FedEx Charges	1.00	20.85	20.85
317753	06/12/2018		FedEx Charges	1.00	20.85	20.85
317751	06/13/2018		FedEx Charges	1.00	26.74	26.74
320270	07/03/2018		FedEx Charges	1.00	20.75	20.75
346234	05/30/2019		FedEx Charges	1.00	28.79	28.79
346236	05/30/2019		FedEx Charges	1.00	22.19	22.19
348693	05/30/2019		FedEx Charges	1.00	28.79	28.79
348695	05/30/2019		FedEx Charges	1.00	22.19	22.19
Component: FedEx				13.00		306.67

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Filing Fee						
223580	08/26/2015		Filing Fees	1.00	242.49	242.49
226810	09/29/2015		Filing Fees	1.00	300.00	300.00
286406	06/27/2017		Filing Fees	1.00	22.49	22.49
286407	06/27/2017		Filing Fees	1.00	22.49	22.49
288618	07/19/2017		Filing Fees	1.00	22.49	22.49
290429	08/10/2017		Filing Fees	1.00	102.75	102.75
290430	08/10/2017		Filing Fees	1.00	240.00	240.00
295127	10/13/2017		Filing Fees	1.00	30.00	30.00
312224	04/26/2018		Filing Fees	1.00	259.00	259.00
312573	05/02/2018		Filing Fees	1.00	30.00	30.00
312850	05/04/2018		Filing Fees	1.00	479.00	479.00
				Component: Filing Fee		
				11.00		1,750.71
Component: Hotel						
324328	09/17/2018		Hotel Charges	1.00	202.57	202.57
				Component: Hotel		
				1.00		202.57
Component: Meal						
316543	06/15/2018		Meal	1.00	15.94	15.94
324330	09/18/2018		Meal	1.00	23.73	23.73
324331	09/18/2018		Meal	1.00	7.21	7.21

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
350687	06/28/2019		Meal	1.00	26.63	26.63
Component: Meal				4.00		73.51
Component: Mileage						
324333	09/17/2018		Mileage	1.00	188.57	188.57
Component: Mileage				1.00		188.57
Component: PACER						
231661	11/03/2015		PACER	1.00	0.30	0.30
268114	11/01/2016		PACER	1.00	1.30	1.30
Component: PACER				2.00		1.60
Component: Parking						
316628	06/15/2018		Parking	1.00	30.00	30.00
321129	07/06/2018		Parking	1.00	28.00	28.00
350686	06/28/2019		Parking	1.00	28.00	28.00
Component: Parking				3.00		86.00
Component: Postage						
295333	10/18/2017		Postage	1.00	1.38	1.38
313949	05/18/2018		Postage	1.00	3.30	3.30
319153	07/18/2018		Postage	1.00	0.47	0.47
326825	10/19/2018		Postage	1.00	0.68	0.68
Component: Postage				4.00		5.83

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Rep B&W						
236096	12/22/2015		Reproduction (B&W)	35.00	0.15	5.25
258654	07/25/2016		Reproduction (B&W)	29.00	0.15	4.35
258815	07/26/2016		Reproduction (B&W)	50.00	0.15	7.50
260515	08/09/2016		Reproduction (B&W)	30.00	0.15	4.50
264139	09/19/2016		Reproduction (B&W)	1.00	0.15	0.15
264457	09/19/2016		Reproduction (B&W)	1.00	0.15	0.15
286836	07/05/2017		Reproduction (B&W)	49.00	0.15	7.35
287080	07/07/2017		Reproduction (B&W)	49.00	0.15	7.35
294012	10/02/2017		Reproduction (B&W)	8.00	0.15	1.20
296577	11/03/2017		Reproduction (B&W)	126.00	0.15	18.90
298690	12/01/2017		Reproduction (B&W)	560.00	0.15	84.00
301484	01/03/2018		Reproduction (B&W)	88.00	0.15	13.20
313073	05/08/2018		Reproduction (B&W)	35.00	0.15	5.25
322531	09/04/2018		Reproduction (B&W)	1,084.00	0.15	162.60
				Component: Rep B&W		
				2,145.00		321.75
Component: Rep Color						
236134	12/22/2015		Reproduction (Color)	0.00	0.25	0.00
258673	07/25/2016		Reproduction (Color)	0.00	0.25	0.00
258820	07/26/2016		Reproduction (Color)	0.00	0.25	0.00

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Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
260523	08/09/2016		Reproduction (Color)	0.00	0.25	0.00
294072	10/02/2017		Reproduction (Color)	2.00	0.25	0.50
294830	10/09/2017		Reproduction (Color)	2.00	0.25	0.50
313136	05/08/2018		Reproduction (Color)	1.00	0.25	0.25
313735	05/16/2018		Reproduction (Color)	1.00	0.25	0.25
315278	06/05/2018		Reproduction (Color)	1.00	0.25	0.25
318663	07/12/2018		Reproduction (Color)	1.00	0.25	0.25
321776	08/23/2018		Reproduction (Color)	1.00	0.25	0.25
322622	09/04/2018		Reproduction (Color)	3.00	0.25	0.75
325166	10/01/2018		Reproduction (Color)	3.00	0.25	0.75
327959	11/05/2018		Reproduction (Color)	3.00	0.25	0.75
330490	12/05/2018		Reproduction (Color)	3.00	0.25	0.75
332698	01/05/2019		Reproduction (Color)	3.00	0.25	0.75
335775	02/07/2019		Reproduction (Color)	3.00	0.25	0.75
338789	03/14/2019		Reproduction (Color)	3.00	0.25	0.75
340476	04/05/2019		Reproduction (Color)	3.00	0.25	0.75
343617	05/07/2019		Reproduction (Color)	3.00	0.25	0.75
346660	06/05/2019		Reproduction (Color)	3.00	0.25	0.75
349277	07/05/2019		Reproduction (Color)	3.00	0.25	0.75
351971	08/05/2019		Reproduction (Color)	3.00	0.25	0.75

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Rep Color				45.00		11.25
Component: Scans						
236171	12/22/2015		Reproduction (Scans)	0.00	0.05	0.00
258692	07/25/2016		Reproduction (Scans)	0.00	0.05	0.00
258825	07/26/2016		Reproduction (Scans)	0.00	0.05	0.00
260531	08/09/2016		Reproduction (Scans)	0.00	0.05	0.00
296640	11/03/2017		Reproduction (Scans)	17.00	0.05	0.85
296833	11/05/2017		Reproduction (Scans)	17.00	0.05	0.85
322668	09/04/2018		Reproduction (Scans)	12.00	0.05	0.60
325210	10/01/2018		Reproduction (Scans)	12.00	0.05	0.60
328003	11/05/2018		Reproduction (Scans)	12.00	0.05	0.60
330532	12/05/2018		Reproduction (Scans)	12.00	0.05	0.60
332740	01/05/2019		Reproduction (Scans)	12.00	0.05	0.60
335816	02/07/2019		Reproduction (Scans)	12.00	0.05	0.60
338830	03/14/2019		Reproduction (Scans)	12.00	0.05	0.60
340517	04/05/2019		Reproduction (Scans)	12.00	0.05	0.60
343658	05/07/2019		Reproduction (Scans)	12.00	0.05	0.60
346701	06/05/2019		Reproduction (Scans)	12.00	0.05	0.60
349319	07/05/2019		Reproduction (Scans)	12.00	0.05	0.60
352013	08/05/2019		Reproduction (Scans)	12.00	0.05	0.60

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Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Scans				178.00		8.90
Component: Taxi						
316544	06/15/2018		Taxi	1.00	29.08	29.08
316545	06/15/2018		Taxi	1.00	31.03	31.03
321130	07/06/2018		Taxi	1.00	30.40	30.40
321131	07/06/2018		Taxi	1.00	30.86	30.86
Component: Taxi				4.00		121.37
Component: Westlaw						
260195	07/21/2016		Westlaw charges	1.00	0.39	0.39
260196	07/22/2016		Westlaw charges	1.00	1.31	1.31
260197	07/25/2016		Westlaw charges	1.00	0.13	0.13
260198	07/28/2016		Westlaw charges	1.00	0.04	0.04
262907	08/02/2016		Westlaw charges	1.00	1.05	1.05
262908	08/05/2016		Westlaw charges	1.00	0.40	0.40
262909	08/08/2016		Westlaw charges	1.00	0.05	0.05
282818	04/25/2017	JRM	Westlaw charges	1.00	0.48	0.48
289667	07/18/2017		Westlaw charges	1.00	0.77	0.77
299172	11/13/2017		Westlaw charges	1.00	0.95	0.95
301936	12/04/2017		Westlaw charges	1.00	4.06	4.06
301937	12/05/2017		Westlaw charges	1.00	6.36	6.36

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
301938	12/06/2017		Westlaw charges	1.00	5.75	5.75
301939	12/06/2017		Westlaw charges	1.00	0.22	0.22
315769	05/17/2018		Westlaw charges	1.00	0.26	0.26
317850	06/11/2018	JRM	Westlaw charges	1.00	0.79	0.79
317848	06/13/2018		Westlaw charges	1.00	0.91	0.91
317851	06/13/2018	JRM	Westlaw charges	1.00	1.19	1.19
317849	06/14/2018		Westlaw charges	1.00	1.22	1.22
325724	09/17/2018		Westlaw charges	1.00	6.03	6.03
325723	09/26/2018		Westlaw charges	1.00	0.35	0.35
328237	10/05/2018		Westlaw charges	1.00	0.07	0.07
328238	10/08/2018		Westlaw charges	1.00	0.41	0.41
332852	12/10/2018		Westlaw charges	1.00	1.43	1.43
332853	12/14/2018		Westlaw charges	1.00	1.29	1.29
332854	12/18/2018		Westlaw charges	1.00	0.33	0.33
332855	12/21/2018		Westlaw charges	1.00	1.14	1.14
332856	12/21/2018		Westlaw charges	1.00	1.24	1.24
335241	01/17/2019		Westlaw charges	1.00	0.06	0.06
340624	03/07/2019		Westlaw charges	1.00	1.36	1.36
340625	03/08/2019		Westlaw charges	1.00	2.52	2.52
343272	04/09/2019		Westlaw Charges	1.00	0.13	0.13

Terrell Marshall Law Group PLLC

Barrett Business Services, Inc.

Matter ID 1921-001

Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
346390	05/20/2019		Westlaw Charges	1.00	5.41	5.41
348845	06/26/2019		Westlaw Charges	1.00	0.04	0.04
348846	06/27/2019		Westlaw Charges	1.00	0.13	0.13
Component: Westlaw				35.00		48.27
Grand Total:				2,466.00		\$8,491.81

Exhibit E

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

JULIUS TERRELL, as an individual and as a
representative of the class,

Plaintiff,

v.

COSTCO WHOLESALE CORP.,

Defendant.

NO. 16-2-19140-1 SEA

**[PROPOSED] ORDER APPROVING
AWARD OF ATTORNEYS' FEES AND
COSTS**

THIS MATTER came before the Court on June 15, 2018, on Plaintiff's Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and Class Representative Service Award. On June 15, 2018, the Court entered an order granting final approval of the Class Settlement, approving payment of the requested attorney's fees, costs and costs of settlement administration, and awarding a class representative service award. The Court makes the following additional findings regarding its award of attorneys' fees, costs and service award.

The Court heard oral argument on June 15, 2018, and has considered the following submissions:

- 1 1. Plaintiff's Motion for Attorneys' Fees, Costs, and Class Representative Service
- 2 Award;
- 3 2. The Declaration of E. Michelle Drake in support of Plaintiff's Motion for
- 4 Attorneys' Fees, Costs, and Class Representative Service Award;
- 5 3. The Declaration of Jennifer M. Keough Regarding Notice Administration and
- 6 Administration Costs; and
- 7 4. Plaintiff's Motion for Final Approval of Class Action Settlement and supporting
- 8 documentation.

9 Based on the foregoing, the Court makes the following FINDINGS AND
10 CONCLUSIONS:

- 11 1. Class Counsel is highly qualified. Berger & Montague, P.C. and Terrell
- 12 Marshall Law Group, are class action litigators with nationally known reputations, and
- 13 extensive experience litigating Fair Credit Reporting Act cases.
- 14 2. Throughout the litigation, Class Counsel provided high quality representation in
- 15 a case that turned out to be quite complex.
- 16 3. Class Counsel obtained an excellent result for the Settlement Class. Class
- 17 Counsel's work lead to the creation of a \$2.49 million common fund. Nearly 20% of the Class
- 18 submitted claims, and each class member who submitted a claim will be paid an estimated \$63.
- 19 These results exceed those achieved in similar cases.
- 20 4. The Settlement created a common fund for the benefit of class members.
- 21 Accordingly, the Court finds that the percentage of the fund method is the appropriate method
- 22 to use in determining the appropriate fee award in this case. *Bowles v. Wash. Dep't of Ret. Sys.*,
- 23 121 Wn.2d 52, 72, 847 P.2d 440 (1993).
- 24 5. An attorneys' fee award equal to one-third of a common fund is appropriate in
- 25 cases litigated under the Fair Credit Reporting Act. *King v. Gen. Info. Serv., Inc.*, No. 10-cv-
- 26 6850, ECF No. 126 (E.D. Penn. Nov. 4, 2014) (awarding counsel one-third of fund in FCRA

class action); *Ford v. CEC Entm't Inc.*, No. 14CV677 JLS (JLB), 2015 WL 11439033, at *1 (S.D. Cal. Dec. 14, 2015) (awarding fee of one-third in FCRA class action); *Razilov v. Nationwide Mut. Ins. Co.*, No. 01-CV-1466-BR, 2006 WL 3312024, at *1 (D. Or. Nov. 13, 2006).

6. The Court has considered the factors set forth in Washington Rule of Professional Conduct 1.5(a) in concluding that the requested fee is reasonable. Specifically:

- a. The case raised novel and difficult questions of law, which demanded litigators with the skill and experience of Class Counsel.
- b. Class Counsel's work on this matter precluded work on other matters.
- c. A one-third fee in contingency cases is customary in this county.
- d. The excellent results obtained and the amount of time involved support the award.

7. While the Court concludes that the percentage-of-the-fund method is appropriate here, the Court concludes that the lodestar method confirms that the requested fee is reasonable. Class Counsel devoted over 513 hours to the investigation, development, litigation and resolution of this case, incurring over \$222,400.30 in lodestar. The Court has reviewed Class Counsel's contemporaneous billing records documenting the hours worked and finds the hours expended reasonable.

8. Class Counsel calculated their lodestar using reasonable hourly rates.

- a. The following hourly rates billed by Berger and Montague are reasonable given the experience and skill of counsel:

Timekeeper	Experience	Rate
E. Michelle Drake	Partner with 17 years of experience	\$700
Joseph Hashmall	Associate with 7 years of experience	\$515
John Albanese	Associate with 6 years of experience	\$430
Jean Hibray, Jean Ebensperger and Mai Xiong	Paralegals	\$230-\$280

b. The following hourly rates billed by Terrell Marshall Law Group are reasonable given the experience and skill of counsel:

Timekeeper	Experience	Rate
Beth E. Terrell	Partner with 23 years of experience.	\$500
Amanda M. Steiner	Partner with 21 years of experience.	\$495
Jennifer R. Murray	Partner with 13 years of experience.	\$450
Maria C. Hoisington	Associate with 2 years of experience.	\$225
Bradford Kinsey, Holly Rota, Hannelore Ohaus, Samuel Levy	Paralegals and legal assistants.	\$75-\$100

9. Similar rates have been approved numerous times in class action cases brought in both the Western District of Washington and King County Superior Court. See, e.g., *Carideo v. Dell, Inc.*, No. 06-cv-01772, ECF No. 162 (W.D. Wash. Dec. 17, 2010) (Judge Robart approving as reasonable a fee petition which included rates ranging from \$175 to \$600); *Barnett v. Wal-Mart Stores, Inc.*, No. 01-2-24553-8 (King Co., July 20, 2009) (Judge Spector approving fee request based on rates ranging from \$100 to \$760); *Splater v. Thermal Ease Hydronic Systems, Inc.*, No. 03-2-33553-3 (King Co., July 31, 2009) (Judge Washington approving fee request based on rates ranging from \$100 to \$760); *Hartman v. Comcast Business Communications, LLC*, No. 10-0413, ECF No. 106 (W.D. Wash Dec. 8, 2011) (Judge Lasnik approving Plaintiff's counsel's fee request based on rates ranging from \$180 to \$650). Class Counsel are experienced, highly regarded members of the bar with extensive expertise in the area of class actions and complex litigation involving Fair Credit Reporting Act claims like those at issue here. Their requested hourly rates are reasonable in light of their qualifications and experience.

10. Class Counsel's requested fee of \$830,000 represents a 3.73 multiplier on their total lodestar to date. This requested multiplier is reasonable considering that counsel is seeking one-third of the common fund created through the Settlement. See *Bowles*, 121 Wn.2d at 72-73 (approving multiplier of three where plaintiff's fee request was found reasonable using

1 percentage-of-the-fund method); see *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1051, n. 6
2 (9th Cir. 2002) (finding that in approximately 83% of cases surveyed by the court, the
3 multiplier was between 1.0 and 4.0 and affirming a multiplier of 3.65); *McIntosh v. McAfee,*
4 *Inc.*, No. 06-cv-7694, 2009 WL 673976, at *2 (N.D. Cal. 2009) (recognizing a range from “2 to
5 4 or even higher”); *Van Vranken v. Atlantic Richfield Co.*, 901 F. Supp. 294, 298 (N.D. Cal.
6 1995) (“[m]ultipliers in the 3-4 range are common”).

7 11. Class Counsel assumed significant risk in this case, a factor which further
8 justifies the requested multiplier. Class Counsel took this case on a contingency basis and have
9 devoted nearly two years to prosecuting it with no guarantee they would ever be paid for their
10 efforts. A review of the motions pending before this Court prior to settlement more illustrates
11 the risk Counsel took in taking on this case. Both the delay in payment and the risk involved in
12 this kind of case justify the multiplier requested here.

13 12. Class Counsel’s requested costs are also reasonable. Counsel submitted detailed
14 and itemized cost records to the Court, which the Court has reviewed, and approved.

15 13. The Settlement Administrator’s fee request is also reasonable. The
16 Administrator submitted a declaration describing the services performed in providing notice to
17 Class Members, processing claims, and answering Class Member inquiries, among other tasks.
18 The fee charged for these services was reasonable, and is approved.

19 14. The Class Representative’s requested service payment is also reasonable.
20 Plaintiff assisted in the investigation, litigation and settlement of this case, and a \$3500 service
21 payment for his assistance to the Class is reasonable and appropriate.

22 **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

23 The following payments in connection with the Settlement may be deducted from the
24 settlement fund in accordance with the Court’s Final Approval Order and the Settlement
25 Agreement:

(1) attorneys' fees to Class Counsel in the amount of \$830,000, which is one-third of the settlement fund;

(2) reimbursement of Class Counsel's out-of-pocket costs in the amount of \$17,780.12;

(3) reimbursement of the Settlement Administrator's expenses in an amount not to exceed \$179,822 to JND Administration; and

(4) a Class Representative Service Award of \$3,500 to Plaintiff Julius Terrell.

IT IS HEREBY ORDERED.

DATED this 19th day of June, 2018.



HONORABLE MARY E. ROBERTS
KING COUNTY SUPERIOR COURT JUDGE

Presented by:

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