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Attorneys for Plaintiffs TAQUELIA WASHINGTON TOLAND AND GEORGIA TOLAND
Individually and on Behalf of All Others Similarly Situated

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

TAQUELIA WASHINGTON TOLAND
and GEORGIA TOLAND, individually
and on behalf of All Others Similarly
Situating,

Plaintiffs,

vs.

NATIONSTAR MORTGAGE LLC, a
Delaware limited liability company;
VERIPRO SOLUTIONS INC., a Delaware
corporation, and DOES 1 through 20,

Defendants.

Case No. 3:17-cv-02575-JD

CLASS ACTION

**DECLARATION OF ARTHUR D.
LEVY IN SUPPORT PLAINTIFFS'
MOTION FOR AWARD OF
ATTORNEYS' FEES, EXPENSES,
AND SERVICE AWARDS**

Date: April 21, 2022

Time: 10:00 a.m.

Courtroom 11, 19th Floor

Hon. James Donato

Complaint Filed: March 24, 2017

1 I, Arthur D. Levy, say:

2 1. I am a member in good standing of the State Bar of California and have been
3 counsel of record for Plaintiffs from the filing of the state court case in March 2017 to date.

4 PROFESSIONAL AND CLASS ACTION QUALIFICATIONS AND EXPERIENCE

5 2. I was admitted to the California Bar in 1980 after graduating from UC Berkeley
6 School of Law. I was an editor of the California Law Review for two years during law school
7 and became a member of the Order of the Coif.

8 3. I have 41 years of litigation experience. From late 1980 until 1983, I worked as a
9 litigation associate in Morrison & Foerster's San Francisco office, working primarily on antitrust
10 cases. From 1983 until 1985, I worked as a litigation associate at Collette & Erickson, working
11 primarily on real estate cases. From 1985 until 1988, I had a solo litigation practice in San
12 Francisco, handling a variety of business litigation matters. From 1988 until 1997, I was a
13 partner in the law firm of Ewell & Levy in San Francisco, where I continued a business litigation
14 practice. In 1997, I co-founded Levy, Ram & Olson and was a partner through May 2009,
15 primarily handling consumer class action cases.

16 4. Levy, Ram & Olson was founded in March 1997 by Michael Ram (a Lief, &
17 Cabraser, Heimann & Bernstein partner), Karl Olson (a Cooper, White & Cooper partner), and
18 myself. All three of us had once been associates at Morrison & Foerster. Erica L. Craven later
19 joined us as a partner in the firm. From its inception, the firm specialized in consumer class
20 action and consumer litigation under the California Unfair Competition Law (Bus. & Prof. Code
21 §§ 17200 *et seq.*). Approximately 70% of our work over the last five years of the firm was in the
22 consumer class action/17200 practice area.

23 5. In June 2009, Levy, Ram & Olson disbanded so the partners could pursue
24 different directions in class action practice. Since then, I have been a sole practitioner and have
25 continued my class practice in co-counseling arrangements with other law firms. I am currently
26 Director of Litigation for Housing and Economic Rights Advocates, a not-for-profit legal service
27 and advocacy organization located in Oakland that provides assistance and representation to low-
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income consumers in the areas of affordable credit, credit reporting, mortgage, student, and medical lending, and debt collection defense.

6. I have personally served as lead counsel in consumer class action cases, including the following:

- *Doskocz v. ALS Lien Services*, Contra Costa County Superior Court Case No. MSC17-01486 (class certified);
- *Banks v. JPMorgan Chase Bank, N.A.*, Alameda Superior Court Case No. RG12614875 (settlement class certified);
- *Velline v. JPMorgan Chase Bank, N.A.*, Alameda Superior Court Case No. RG14714754 (settlement class certified);
- *De La Torre v. CashCall, Inc.*, San Mateo Superior Court Case No. 19-CIV-01235 (class certified);
- *O'Donovan v. CashCall, Inc.*, U.S. District Court for the Northern District of California, Case No. C 08-03174 TSH (class certified);
- *Perez v. Barclay's Capital Real Estate, Inc.*, San Francisco Superior Court Case No. CGC-10-496374 (settlement class certified);
- *Carias v. Lenox Financial Mortgage Corp.*, Contra Costa Superior Court Case No. CIV MSC 06-02409 (class certified);
- *Munn v. Eastwood Insurance Services, Inc.*, Orange County Superior Court Complex Litigation Case No. 06CC00110 (class certified on July 9, 2007);
- *Porter v. Auto Insurance Specialists*, JAMS Arbitration No. 1100048278 (class certified October 23, 2007 by Judges James Warren, Edward Infante, and Richard Neal);
- *Lesser v. IKON*, San Francisco Superior Court Case No. 992793 (settlement class certified);
- *Gluck v. Bank of America Corporation*, San Francisco Superior Court Case No. 308496 (settlement class certified);
- *Beach v. Bank of America*, Alameda County Superior Court Case No. 2002-054356 (class certified); and
- *Lesser v. Pacific Bell Directory*, Alameda County Superior Court Case No. 2002-066344 (settlement class certified).

7. I personally served as lead trial counsel in a 13-day UCL bench trial from March through May 2021 in a certified consumer loan unconscionability class action, *De La Torre v. CashCall, Inc.*, San Mateo Superior Court Case No. 19-CIV-01235. Closing arguments in that

1 case were held on November 1, 2021, and the case is currently under submission for decision
 2 before the Honorable Marie S. Weiner. I was also lead trial counsel in a UCL bench trial in 2015
 3 in a certified EFTA “conditioning claim” class action in the related predecessor federal case, *De*
 4 *La Torre v. CashCall, Inc.*, U.S. District Court for the Northern District of California, Case No.
 5 C 08-03174 TSH. That trial resulted in a class recovery that led to a settlement of the litigation.

6 8. I also served as lead trial counsel in two non-class action UCL trials: *Krumme v.*
 7 *Mercury Insurance Company*, San Francisco Superior Court Case No. 313367 (tried to plaintiff’s
 8 judgment in July 2002 and affirmed on appeal in October 2004), and *Wilson v. Brawn of*
 9 *California*, San Francisco Superior Court Case No. CGC-02-404454 (tried to plaintiff’s
 10 judgment in April 2003 and reversed on appeal in September 2005).

11 9. I also served as lead trial counsel in the California Department of Insurance’s
 12 administrative Non-Compliance Case against Mercury Insurance Company, *In the Matter of*
 13 *Mercury Insurance Company*, Office of Administrative Hearings Case No. N2006040185. That
 14 two-week trial resulted in the State recovering \$27.6 million in penalties. Mercury challenged
 15 this ruling in an administrative mandamus action in the Orange County Superior Court. The
 16 Fourth District Court of Appeal, Division 3, affirmed the penalty award in full in *Mercury*
 17 *Insurance Co. v. Lara* (2019) 35 Cal.App.5th 82 (rev. denied 8/14/19).

18 CASE HISTORY

19 10. In the remand proceeding in this case, defendants claimed that they could not
 20 identify Class members based on data mining algorithms but would have to conduct manual file
 21 reviews. To test this assertion and to prepare for depositions, Plaintiffs served document and data
 22 requests and interrogatories on defendants. These were served in August 2018.

23 11. Defendants declined to provide the requested class data, instead providing
 24 fragmentary data for 300 potential Class members. Class counsel met and conferred with
 25 defense counsel in an effort to resolve the data disputes, including an in-person meeting on
 26 March 1, 2019, without success. On March 6, 2019, Class Counsel submitted a discovery
 27 dispute letter on the data issues to the Court. (Dkt. No. 48.) The Court held a telephone
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1 discovery conference on April 9, 2019, at which the Court ruled that Plaintiffs were not required
2 to accept defendants' list of 300 but were entitled to pursue data discovery from defendants to
3 develop methods of identifying the Class and to assure a complete Class list. (Dkt. Nos. 51, 53.)

4 12. After the telephone conference with the Court, Class Counsel again attempted to
5 meet and confer with defendants to resolve the data issues and obtain the data necessary to assess
6 Class identification and definition issues. When this again proved unsuccessful, on May 6, 2019,
7 Plaintiffs sought a second discovery conference with the Court. (Dkt. No. 54.) The Court held a
8 second discovery conference on June 6, 2019, at the end of which the Court ordered counsel to
9 appear in Court in person on June 10. (Dkt. No. 56.) On June 10, counsel for both sides met in
10 the jury room and reached agreements to resolve the discovery dispute. (Dkt. No. 58.) Under
11 this agreement, defendants agreed to exert best efforts to provide Class Counsel with the
12 requested data by July 1, 2019, based on clarifications and definitions provided by Class
13 Counsel. (Dkt. 59.)

14 13. Class Counsel then pursued PMK depositions from defendants. Because
15 defendants' Fed. R. Civ. P. 30(b)(6) witnesses were located in Dallas, HERA Senior Staff
16 Attorney Natalie Lyons and I traveled to Dallas, where I took the PMK deposition of Phillip
17 Livingston for defendant Veripro on July 24, 2019 and the PMK deposition of A.J. Loll for
18 defendant Nationstar on July 25, 2019.

19 14. Obtaining testimony from these witnesses was key to supporting Plaintiffs'
20 Motion for Class Certification (Dkt. No. 72) and opposing defendants' Motion for Summary
21 Judgment (Dkt. No. 100). (*See* Docket No.72-1, Ex. 8, 12; No. 100, Ex. 8, 12.)

22 15. Promptly upon returning from Texas, Class Counsel served follow-on document
23 and data requests and interrogatories to pursue new information leads that emerged during the
24 Dallas depositions. These resulted in further discovery issues and an additional extended meet
25 and confer, including an in-person meeting on September 4, 2019. Class Counsel submitted a
26 third discovery dispute letter to the Court on September 6, 2019. (Dkt. No. 62.) On November
27 8, 2019, the Court held a third discovery hearing, at which the Court directed defendants to
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1 produce the data fields for loan purpose, occupancy status and cross-reference identifiers
2 between Nationstar's loans and Veripro's accounts for loans recorded as potentially foreclosed or
3 related to a short sale. (Dkt. No. 66.)

4 16. Having obtained this data, Class Counsel were able to determine that, contrary to
5 defendants' claim that there were only 300 potential Collection Letter Subclass members, there
6 were potentially over twice that many, 677. On November 18, 2021, Defendants produced a
7 Collection Letter Subclass List pursuant to Settlement Agreement § 2.2(b), containing 377
8 ~~potential~~actual Collection Letter subclass members, 25% more than the 300 potential members
9 defendants initially claimed before Plaintiffs' data analysis.

10 17. Meanwhile, defendants served interrogatories, document requests, and requests
11 for admission on Plaintiffs. Responses were timely served on January 22, 2019. Defendants
12 thereafter took both Plaintiffs' depositions, on July 18 & 19, 2019.

13 18. Class Counsel turned to preparing for expert reports and depositions per the
14 Court's Case Management Scheduling Order of November 25, 2019. (Dkt. No. 67.) Expert
15 reports were exchanged on September 13, 2019. Plaintiff submitted one report, from credit
16 reporting expert Evan Hendricks; defendants submitted two expert reports, one from credit
17 reporting expert John Ulzheimer and the other from damages expert Thomas Lambert. Rebuttal
18 expert reports were exchanged on October 3, 2019. Depositions of experts Hendricks and
19 Ulzheimer were taken remotely on October 11 and 24, and December 10, 2019.

20 19. On November 29, 2019, Plaintiffs learned for the first time of a second class
21 action against Nationstar challenging its mortgage deficiency collection and credit reporting
22 practices under California law, *McCoy v Nationstar Mortgage, LLC*, U.S. Dist. Ct. S.D. Cal.
23 Case No. 15cv2366 DMS. The *McCoy* Plaintiff and Nationstar had entered a proposed Class
24 Action Settlement that could have preempted this case, at least on the collection claim ground.
25 (*McCoy* Dkt No. 239-1.)

26 20. Section 1.10 of the *McCoy* Settlement Agreement defined the "FDCPA Letter" as
27 "all correspondence sent to the Settlement Class Members, after October 19, 2014, including any
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1 Welcome Letter, Demand Letter, Account Statement, or any other correspondence, in an attempt
2 to collect the purported debt.” (Emphasis added.) Section 1.24 defined “Released Claims” as
3 “any and all claims under the FDCPA, RFDCPA, and FDCPA State Equivalents *based upon the*
4 *FDCPA Letters, regardless of whether the claims were asserted in the Litigation.*” (Emphasis
5 added.) These provisions were arguably broad enough to sweep the collection claims in this
6 case, which are based on form letters that Veripro, a Nationstar subsidiary, sent to the Collection
7 Letter Subclass, within the scope of the Class release in *McCoy*.

8 21. Class Counsel reviewed and analyzed the *McCoy* settlement and on December 2,
9 2019, filed Objections to protect this case. (*McCoy* Dkt. No. 246.) The Court agreed that the
10 proposed settlement should be modified to exclude this action entirely from the *McCoy*
11 settlement and sustained some of our objections to the class notice plan in *McCoy*. (*McCoy* Dkt.
12 No. 258, pp. 11-12.) After the *McCoy* parties moved for final approval, Class Counsel appeared
13 at a hearing before Judge Dana Sabraw in San Diego to oppose on February 14, 2020. (*McCoy*
14 Dkt. No. 256.) The Court approved the *McCoy* settlement, but excluded this case from the
15 coverage of the settlement. (*McCoy* Dkt. No. 267.) Thus, it was necessary for Class Counsel to
16 object to the *McCoy* settlement to ensure that *McCoy* did not preempt the instant Class Action.
17 Class Counsel achieved that objective.

18 22. Meanwhile, Class Counsel had turned in earnest to preparing their Motion for
19 Class Certification, which they filed on January 14, 2020 in accordance with the Court’s
20 schedule, with a hearing date of March 19, 2020. (Dkt. No. 72.) Defendants filed opposition on
21 February 11, 2020 (Dkt. No. 76), and Plaintiffs filed their reply on February 26 (Dkt. No. 77).

22 23. The pandemic resulted in delays in the hearing of the Motion for Class
23 Certification and defense Motion for Summary Judgment in this case, as well as the trial
24 schedule. (Dkt. Nos. 79, 80, 82.) As a result, the hearing of the Motion for Class Certification
25 was ultimately set for August 13, 2020, and a briefing and hearing schedule was set for
26 defendants’ Motion for Summary Judgment. (Dkt. 83.) Defendants’ Motion for Summary
27 Judgment was refiled accordingly on May 15, 2020 (Dkt. No. 94), opposed on June 8, 2020 (Dkt.
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1 No. 100), and fully briefed on June 29, 2020 (Dkt. No. 104). Defendants also filed a *Daubert*
2 motion in parallel with their Motion for Summary Judgment to exclude expert Evan Hendricks's
3 testimony, which was briefed and to be heard concurrently with their Motion for Summary
4 Judgment on August 13, 2020. (Dkt. Nos. 95, 99, 105.)

5 24. In October 2019, the parties attended a mediation before retired Alameda Superior
6 Court Judge Hernandez at ADR Services. Mediation statements were prepared and exchanged.
7 The mediation was held on October 25, 2019 and lasted most of the day. No settlement was
8 reached.

9 25. While the Motion for Class Certification was pending in early 2020, in
10 accordance with a settlement reference from the Court (Dkt. No. 75), the parties scheduled a
11 mandatory settlement conference before Magistrate Judge Ryu. A mandatory settlement
12 conference was initially set for May 4, 2020 and then moved to July 27 to allow the Motion for
13 Class Certification and Motion for Summary Judgment to be fully briefed (but not heard or
14 decided) before the settlement conference. (Dkt. Nos. 75, 93.)

15 26. Settlement progress was made at the conference, held remotely with Judge Ryu
16 on July 27, 2021. (Dkt. No. 106.) The parties proposed a stipulation to continue the Motion for
17 Class Certification and Motion for Summary Judgment hearing dates. (Dkt. No. 107.) In
18 response, the Court issued an Order staying the case and vacating all deadlines and hearings.
19 (Dkt. No. 108.) The parties then continued settlement discussions and negotiations, which led to
20 a further remote settlement conference with Judge Ryu on August 25-26, 2020, at which a
21 settlement in principle was reached. (Dkt. No. 111.) In the settlement conferences before Judge
22 Ryu, there were no fee negotiations until the parties had reached an agreement in principle on the
23 terms of the Class settlement.

24 27. The parties then engaged in lengthy and intensive negotiation and drafting of the
25 Settlement Agreement and the associated Class Notice and Claim form for this settlement. Class
26 Counsel obtained estimates from four settlement administrators. By early February 2021, the
27 settlement documentation was complete, and Plaintiffs filed their preliminary approval motion.
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1 (Dkt. No. 117.) On April 15, 2021, the Court held a hearing on the Motion for Preliminary
2 Approval, at which Court required certain changes to the settlement and further explanations
3 from the parties. (Dkt. No. 120.) On May 17, 2020, the parties submitted a Joint Statement in
4 response to the Court's April 15 Order. (Dkt. No. 121.) The Court approved the parties'
5 proposed changes on October 20, 2021 (Dkt. No. 123) and issued its Preliminary Approval Order
6 on October 29 (Dkt. No. 125), setting December 1, 2021 as the deadline for filing this motion.
7 The parties then stipulated, and the Court ordered, that the deadline for this motion be extended
8 to December 10, 2021. (Dkt. No. 127.)

9 ARTHUR LEVY'S HOURS, RATES, AND EXPENSES

10 28. Throughout this case, I have had a practice of recording my time and expenses in
11 each case contemporaneously and entering them on a computer via the "TimeSlips" time and
12 billing program. I have personally reviewed my time and expense entries in this case and
13 exercised billing judgment by reducing and/or eliminating or writing down entries that were
14 duplicative, unproductive, or mistakenly coded to this case file. I have closely reviewed all of
15 my time entries to support the following reported totals.

16 29. This case was originally filed in state court on March 24, 2017 and removed to
17 this Court (Dkt. No. 1). Through October 31, 2021, I spent 555.8 chargeable hours working on
18 the state court case prior to removal and on this case. This does not include any time to date
19 spent working on this motion or otherwise attending to compliance with the Court's Preliminary
20 Approval Order. My time records as compiled and reported by the TimeSlips program through
21 October 31, 2021 are attached as Exhibit "A" to this declaration.
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30. The following table provides a breakdown of my hours:

Litigation Segment	Hours	% of Total	General Description of Services
Motion for Remand	33.2	6.0%	Motion and reply; expert witness work; supplemental briefing
Discovery and Discovery Enforcement	137.7	24.8%	Prepared, responded to, and analyzed discovery and data; three discovery conferences with the Court; prepared for and take PMK depositions in Dallas and follow-on discovery and enforcement
Mediation and Settlement	70.8	12.7%	Prepared for and attended the mediation and MSC; negotiated and drafted of Settlement Agreement and exhibits
Class Certification	105.0	18.9%	Prepared motion and supporting evidence; reply
Experts	32.6	5.9%	Briefed and prepared credit reporting expert; prepared opening and rebuttal expert reports; reviewed defense expert reports; deposed defense credit reporting expert; defended second session of plaintiffs' expert deposition
<i>McCoy</i> Settlement	56.2	10.1%	Analyzed settlement; prepared Objections; prepared opposition to Final Settlement Approval; attended Final Approval hearing in San Diego
Oppose Defense MSJ and Daubert Motion	73.2	13.2%	Prepared oppositions and supporting evidence
Preliminary Settlement Approval	22.5	4.1%	Prepared preliminary approval motion and supporting evidence; attention to Court's questions; attention to Joint Statement and revised Preliminary Approval Order
Miscellaneous	24.6	4.4%	Attention to case management, compliance, stipulations, and miscellaneous legal research
Total Hours	555.8	100.0%	Through Preliminary Approval Order; does not include any time devoted to this motion or compliance with the Preliminary Approval Order

31. As lead counsel for Plaintiffs in this case, I took a leading role in all aspects of the litigation. I headed the discovery effort, personally reviewing and analyzing defendants'

1 discovery and data responses, taking the lead in the meet and confers, writing the three discovery
2 dispute letters to the Court, and appearing at the three discovery dispute conferences with the
3 Court. I prepared for and personally took the defendants' PMK depositions in Dallas, and was
4 primarily responsible for assisting Evan Hendricks, Plaintiffs' credit reporting expert, in
5 preparing his reports. I analyzed the defense expert reports and took the deposition of defense
6 credit reporting expert, John Ulzheimer.

7 32. I took the leading role in drafting Plaintiffs' Motion for Class Certification,
8 including drafting the opening (Dkt. No. 72) and reply (Dkt. No. 77) briefs and marshaling the
9 supporting evidence.

10 33. I similarly took the leading role in opposing the defense summary judgment
11 motion (Dkt. No. 100) and motion to exclude Mr. Hendricks's testimony (Dkt. No. 99).

12 34. I worked collaboratively with my co-counsel, Kristin Kemnitzer, in analyzing the
13 *McCoy* settlement and preparing the objections to that settlement to protect this case from being
14 preempted by the settlement in that case.

15 35. I attended the mediation with Judge Hernandez in October 2019 and the
16 settlement conferences with Judge Ryu in 2020. I played a leading role in negotiating the
17 settlement, and was the primary negotiator of the Settlement Agreement and the Settlement
18 Notice on the Plaintiffs' side.

19 36. I have represented Plaintiffs in this case entirely on a contingent basis, with
20 respect to both time and expenses. I have not received or been promised any compensation for
21 my time or expenses or reimbursement of any kind from any source, other than from this fee and
22 expense application. I have personally paid all out-of-pocket litigation expenses for which I am
23 requesting reimbursement from the Settlement.

24 37. I am familiar with the rates charged by similarly experienced attorneys for similar
25 work in the San Francisco Bay Area, and believe that \$850 per hour is below current market
26 rates for class action attorneys with my length of experience and level of expertise practicing in
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cases of similar size and complexity. The reasonableness of applying \$850 per hour as my rate in this case is directly confirmed by my fee awards in previous cases:

- Four years ago, in November 2017, Magistrate Judge Maria Elena James approved the rate of \$750 per hour for my time as Class Counsel in *De La Torre v. CashCall, Inc.*, U.S. District Court for the Northern District of California, Case No. C 08-03174 TSH (Dkt. No. 379; settlement of “conditioning claims only).
- In December 2016, Alameda County Superior Court Case Judge Winifred Smith had approved the rate of \$750 per hour for my time as Class Counsel in *Banks v. JPMorgan Chase Bank, N.A.*, Alameda Superior Court Case No. RG12614875.
- In August 2012, San Francisco Superior Court Complex Case Judge John E. Munter approved a rate of \$700 per hour for my time in the class action of *Perez v. Barclay’s Capital Real Estate Inc.*, San Francisco Superior Court Case No. CGC-10-496374.
- In August 2010, Contra Costa County Complex Case Judge Barry Goode approved the \$650 rate in a class action settlement in Contra Costa County, *Carias v. Lenox Financial Mortgage Co.*, Contra Costa Superior Court Case No. CIV MSC 06-02409.
- In January 2009, Retired San Francisco Superior Court Judge James Warren approved \$650 per hour for my time and the other partners in my firm (Levy Ram & Olson) in the JAMS class action arbitration in *Porter v. Auto Insurance Specialists*, JAMS Arbitration No. 1100048278.

38. Considering the time that has passed since these awards, my over 25 years of experience in class action litigation, and my trial experience, an increase of 13.3% over my \$750 per hour rate of four years ago to \$850 per hour reflects a current fair hourly rate for my time.

39. In sum, my lodestar for services rendered through October 31, 2021 is \$472,430.00, based on 555.8 hours at \$850 per hour.

40. My expenses devoted to this case through October 31, 2021, as recorded in the Timeslips program, total \$19,831.25. The following table provides a breakdown of these expenses:

Expense	Amount	% of Total
Expert fees	\$8,286.50	41.8%
Deposition transcripts & remote	\$5,393.84	27.2%
Mediator Fees	\$3,250.00	16.4%
Photocopying	\$1,144.26	5.8%
Travel	\$871.36	4.4%
Research (PACER) and	\$622.60	3.1%
Overnight Mail	\$202.69	1.0%
CourtCall Fees	\$60.00	0.3%
Total	\$19,831.25	100.0%

HERA'S HOURS, RATES AND EXPENSES

41. I have been Director of Litigation for Housing and Economic Rights Advocates (HERA) throughout this litigation. HERA attorneys are among the country's foremost experts on a number of consumer law topics, including mortgage servicing and fair debt collection and credit reporting. HERA regularly provides training on these issues to other attorneys, including through the National Consumer Law Center and Practising Law Institute.

42. HERA has represented consumers in numerous class and individual cases in state and federal court. Among these are four other class action lawsuits that, like this one, implicate post-foreclosure collection on mortgage debts covered by California's anti-deficiency statutes. All of these actions obtained favorable results for consumers. They include:

- *Herrera v. LCS Financial Services Corp., et al.*, N.D. Cal. No. C09-02843 (class certified).
- *Di Giacomo v. Wells Fargo Bank, N.A.*, San Francisco Superior Court Case No. CGC-10-396942 (settlement class certified).
- *Soto v. Home Finance LLC*, Napa Superior Court Case No. 26-50251 (settlement class certified).
- *Morales et al. v. Heritage Pacific Financial LLC*, Santa Clara Superior Court Case No. 110-cv-173203 (class certified).
- *Banks v. JPMorgan Chase Bank*, Alameda County Superior Court Case No. RG12614875 (settlement class certified).

1 43. I worked closely with HERA Senior Staff Attorney Natalie Lyons on this
2 litigation. Ms. Lyons was admitted to the bar in December 2013 and has eight years of civil
3 rights and consumer protection litigation experience. After graduating from Golden Gate
4 University Law School, she was employed by Equal Rights Advocates in San Francisco, where
5 she represented individuals on matters related to their conviction history, including expungement
6 hearings in criminal court, licensing applications, and an EEOC discrimination claim. She also
7 provided guidance and support to pro bono attorneys representing clients in reentry matters.

8 44. From October 2014 until April 2019, she worked as a Staff Attorney at the
9 Southern Poverty Law Center in Atlanta, Georgia. While at SPLC, she litigated civil rights class
10 actions, including against the DHS and ICE relating to border retention practices and access to
11 counsel for immigrant detainees; prisoner rights cases against the Alabama and Georgia state
12 prison systems; and police brutality cases.

13 45. After joining HERA as a Senior Staff Attorney, she continued to work on complex
14 class action cases, including litigation against the federal Department of Education regarding
15 student loan discharges and this case.

16 46. HERA utilizes a commercial database called AbacusLaw, through which staff
17 keep contemporaneous records of time expended in performing various legal tasks on any given
18 case, as well as recoverable costs that HERA incurs in litigation. Staff inputs detailed notes for
19 each time record.

20 47. AbacusLaw allows time records to be downloaded directly into a Microsoft Excel
21 spreadsheet. A true and correct copy of the downloaded AbacusLaw time entries for Ms.
22 Lyons's time is attached to my declaration as Exhibit "B." Ms. Lyons devoted a total of 128.5
23 hours to this case from June 2019 through July 2020.

24 48. Ms. Lyons's work included responding to discovery propounded by defendants,
25 including preparing Plaintiffs for their depositions, defending Taquelia Washington Toland at her
26 deposition; assisting in the PMK depositions, including traveling to Dallas and assisting with the
27 depositions; data analysis; assisting with drafting the class certification motion and reply and
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1 Plaintiffs' response to defendants' motion for summary judgment; legal research; and attending
2 and assisting in the settlement conferences with Magistrate Judge Ryu.

3 49. In light of Ms. Lyons's eight years of class action and litigation experience, a
4 reasonable rate for her services is \$500 per hour. Based on her 128.5 hours of service, HERA's
5 lodestar fee for services in this litigation is \$64,250.00.

6 50. HERA also incurred expenses in this litigation, including travel expenses for the
7 Dallas depositions of \$2,033.66 and transcript costs of \$1,426.70 for the depositions of Georgia
8 Toland and Taquelia Washington Toland, yielding total costs of \$3,460.36.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct, and that this Declaration is executed on December 7, 2021, at Oakland,
11 California.

12 /s/ Arthur D. Levy
13 ARTHUR D. LEVY
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EXHIBIT A

12/6/2021
2:31 PM

Pre-bill Worksheet

Page 1

Nickname Nationstar.Class | 1222.01
 Full Name Taquelia Washington Toland and Georgia Toland
 Address [REDACTED]
 Oakland CA 94610
 Office Phone [REDACTED] Office Fax [REDACTED]
 Cell Phone [REDACTED] Home Phone [REDACTED]
 In Ref To Nationstar/Veripro Class Action
 File No. 1222.01
 Fees Arrg. By billing value on each slip
 Expense Arrg. By billing value on each slip
 Tax Profile Exempt
 Last bill [REDACTED]
 Last charge 10/29/2021
 Last payment Amount \$0.00

Date	Timekeeper	Rate	Hours	Amount	Total
ID	Task	Markup %	DNB Time	DNB Amt	Billable
1/11/2017	ADL	0.00	0.50	0.00	Billable
10804	Analysis Review case against Nationstar/Veripro				
2/8/2017	ADL	0.00	0.70	0.00	Billable
10877	Analysis Prepare for meeting with Taquelia Washington and Georgia Toland				
2/9/2017	ADL	0.00	1.00	0.00	Billable
10878	Analysis Meeting with Taquelia Washington and Georgia Toland re prospective case against Nationstar				
3/2/2017	ADL	0.00	0.30	0.00	Billable
10917	Analysis Attention to Nationstar complaint; meeting with Noah Zinner and attention to emails				
3/2/2017	ADL	0.00	2.00	0.00	Billable
10920	Analysis Attention to Nationstar complaint; meeting with Noah Zinner and attention to emails				
3/3/2017	ADL	0.00	1.50	0.00	Billable
10922	Analysis Further edits to draft complaint				
3/9/2017	ADL	0.00	2.30	0.00	Billable
10937	Analysis Further edits of complaint and related case document				
5/9/2017	ADL	0.00	0.50	0.00	Billable
11013	Analysis Review remand motion; conference call with cocounsel				

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
5/10/2017	ADL 11018 Analysis Research remand motion in Banks case and retrieve	0.00	0.20	0.00	Billable
5/10/2017	ADL 11019 Analysis Obtain and prepare decline magistrate form	0.00	0.20	0.00	Billable
5/25/2017	ADL 11029 Analysis Revisions to remand motion	0.00	5.00	0.00	Billable
5/26/2017	ADL 11030 Analysis Revisions to remand motion	0.00	5.00	0.00	Billable
5/30/2017	ADL 11031 Analysis Further attention to remand motion, declaration and proposed order	0.00	2.00	0.00	Billable
5/30/2017	ADL 11034 Analysis Legal research re remand motion, revise	0.00	0.50	0.00	Billable
6/2/2017	ADL 11048 Analysis Finish removal papers and prepare for filing	0.00	0.80	0.00	Billable
6/2/2017	ADL 11049 Analysis Attend to case management calendar, update	0.00	0.20	0.00	Billable
6/19/2017	ADL 11071 Analysis Attention to briefing schedule, request for extension	0.00	0.20	0.00	Billable
6/22/2017	ADL 11075 Analysis Prepare reply brief, associated legal research and analysis	0.00	8.00	0.00	Billable
6/27/2017	ADL 11077 Analysis Finish remand reply	0.00	1.00	0.00	Billable
7/10/2017	ADL 11099 Analysis Review file re case management exemplars; Telephone call to Kristin Kemnitzer re case management compliance	0.00	0.60	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/20/2017	ADL 11112 Analysis Review plaintiff disclosure production and comment	0.00	0.40	0.00	Billable
7/21/2017	ADL 11114 Analysis Review disclosure documents and CMC compliance drafts; Telephone call to Kristin Kemnitzer	0.00	1.00	0.00	Billable
7/24/2017	ADL 11115 Analysis Review and comment on Jt CMC Statement and Protective Order	0.00	1.00	0.00	Billable
7/26/2017	ADL 11119 Analysis Review and comment on initial disclosure draft	0.00	0.30	0.00	Billable
8/2/2017	ADL 11131 Analysis Prepare for hearing	0.00	1.00	0.00	Billable
8/3/2017	ADL 11132 Analysis Prepare for hearing	0.00	1.50	0.00	Billable
8/15/2017	ADL 11145 Analysis Review Midland Funding decision	0.00	0.40	0.00	Billable
9/5/2017	ADL 11156 Analysis Attention to Nationstar remand filing; research statistical experts	0.00	0.50	0.00	Billable
9/5/2017	ADL 11159 Analysis Telephone calls to Kristin Kemnitzer re reply to Nationstar supplemental remand brief, expert	0.00	0.60	0.00	Billable
9/7/2017	ADL 11168 Analysis Review Professor Stark email and re-read Walsh dec	0.00	0.40	0.00	Billable
9/8/2017	ADL 11169 Analysis Telephone call to Kristin Kemnitzer re expert prep	0.00	0.30	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/8/2017	ADL	0.00	0.50	0.00	Billable
11170	Analysis Telephone call to Philip Stark and Kristin Kemnitzer				
9/11/2017	ADL	0.00	1.00	0.00	Billable
11171	Analysis Review and comment on Stark dec				
9/12/2017	ADL	0.00	0.30	0.00	Billable
11174	Analysis Telephone call to Kristin Kemnitzer re Stark dec and reply brief; emails				
9/13/2017	ADL	0.00	1.00	0.00	Billable
11175	Analysis Attention to supplemental reply				
9/14/2017	ADL	0.00	2.00	0.00	Billable
11176	Analysis Further review and comment on supplemental reply				
9/15/2017	ADL	0.00	0.30	0.00	Billable
11177	Analysis Final review of supplemental reply filing				
11/28/2017	ADL	0.00	0.20	0.00	Billable
11267	Analysis Status email to clients				
3/13/2018	ADL	0.00	0.30	0.00	Billable
11373	Analysis Prepare case management statement				
3/14/2018	ADL	0.00	0.20	0.00	Billable
11376	Analysis Attention to Jt Statement; email to Lazlo Ladi				
5/21/2018	ADL	0.00	0.20	0.00	Billable
11486	Analysis Draft status statement re state court compliance hearing				
7/16/2018	ADL	0.00	0.30	0.00	Billable
11559	Analysis Review remand order; conference call with cocounsel				
7/26/2018	ADL	0.00	1.00	0.00	Billable
11567	Analysis Review and analyze discovery drafts				

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/26/2018 11568	ADL Analysis Telephone call to Kristin Kemnitzer re discovery and followup email	0.00	0.80	0.00	Billable
7/26/2018 11569	ADL Analysis Meeting with Noah Zinner re Nationstar and followup email	0.00	0.30	0.00	Billable
7/26/2018 11570	ADL Analysis Status update to clients	0.00	0.20	0.00	Billable
8/7/2018 11586	ADL Analysis Reiew and revise document requests	0.00	2.00	0.00	Billable
8/8/2018 11587	ADL Analysis Further revisions of document requests	0.00	0.50	0.00	Billable
8/13/2018 11594	ADL Analysis Review and comment on discovery drafts	0.00	1.80	0.00	Billable
8/14/2018 11595	ADL Analysis Further attention to discovery request drafts	0.00	0.30	0.00	Billable
8/15/2018 11597	ADL Analysis Telephone call to Kristin Kemnitzer re interrogatories; revisions to interrogatories	0.00	0.40	0.00	Billable
9/18/2018 11622	ADL Analysis Review defendant's initial disclosures and initial disclosure document production; analyze and take notes; review and respond to Kristin's notes re defense documents; review plaintiff's documents; email to Kristin Kemnitzer re defense initial disclosures	0.00	3.00	0.00	Billable
10/8/2018 11634	ADL Analysis Review and comment on CMC statement	0.00	0.50	0.00	Billable
10/17/2018 11648	ADL Analysis Prepare for and appear at CMC	0.00	2.20	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
11/12/2018	ADL 11690 Analysis Telephone call to Kristin Kemnitzer re discovery status	0.00	0.20	0.00	Billable
11/15/2018	ADL 11694 Analysis Conference call with Judge Ryu	0.00	0.30	0.00	Billable
11/19/2018	ADL 11695 Analysis Review discovery responses and defendants' document productions; review declarations submitted in opposition to remand motion	0.00	1.80	0.00	Billable
11/19/2018	ADL 11697 Analysis Telephone call to Kristin Kemnitzer re defense discovery compliance	0.00	0.60	0.00	Billable
11/19/2018	ADL 11699 Analysis Review and comment on Kristin's meet and confer notes	0.00	0.40	0.00	Billable
11/28/2018	ADL 11702 Analysis Discovery conference call	0.00	0.80	0.00	Billable
12/3/2018	ADL 11713 Analysis Review second installment of defendants' document production	0.00	0.30	0.00	Billable
12/5/2018	ADL 11719 Analysis Telephone call to Kristin Kemnitzer re discovery issues	0.00	0.30	0.00	Billable
12/5/2018	ADL 11720 Analysis Review document productions; design index table; meeting with Brenda Orellana	0.00	0.20	0.00	Billable
12/17/2018	ADL 11725 Analysis Review index of Nationstar policies; telephone call to Kristin Kemnitzer re further review	0.00	0.50	0.00	Billable
12/18/2018	ADL 11726 Analysis Review policies and procedures re responsiveness and completeness	0.00	2.50	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/21/2018	ADL 11727 Analysis Review discovery to plaintiffs, yelephone call to Kristin Kemnitzer re same	0.00	1.00	0.00	Billable
1/11/2019	ADL 11739 Analysis Review discovery and prepare for Jan 14 discovery compliance call	0.00	1.50	0.00	Billable
1/11/2019	ADL 11740 Analysis Review CMC order and calendar	0.00	0.20	0.00	Billable
1/14/2019	ADL 11742 Analysis Attend discovery conference call; followup with Kristin re same	0.00	0.70	0.00	Billable
1/15/2019	ADL 11743 Analysis Prepare summary of conference call	0.00	0.40	0.00	Billable
1/15/2019	ADL 11744 Analysis Review and comment on draft discovery responses	0.00	1.50	0.00	Billable
1/15/2019	ADL 11745 Analysis Legal research re standing	0.00	0.50	0.00	Billable
1/16/2019	ADL 11746 Analysis Additional legal research re standing	0.00	2.00	0.00	Billable
1/16/2019	ADL 11747 Analysis Revisions to interrogatory answers	0.00	1.50	0.00	Billable
1/18/2019	ADL 11752 Analysis Review and comment on draft discovery responses; Telephone call to Kristin Kemnitzer	0.00	0.50	0.00	Billable
2/5/2019	ADL 11766 Analysis Further review of defendants' document production; Telephone call to Kristin Kemnitzer; draft email to defense counsel	0.00	0.80	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/12/2019	ADL 11777 Analysis Review data provided by defense; email to Severson re discovery	0.00	0.80	0.00	Billable
2/19/2019	ADL 11781 Analysis Review and analysis of supplemental discovery responses; prepare for discovery conference call	0.00	3.00	0.00	Billable
2/20/2019	ADL 11785 Analysis Further attention to defense discovery compliance and memo re same	0.00	0.30	0.00	Billable
2/20/2019	ADL 11788 Analysis Telephone call to Kristin Kemnitzer re discovery compliance conference call with defense counsel	0.00	0.30	0.00	Billable
2/25/2019	ADL 11791 Analysis Review and comment of discovery meet and confer letter	0.00	1.50	0.00	Billable
2/28/2019	ADL 11793 Analysis Telephone call to Kristin Kemnitzer re meet and confer	0.00	0.30	0.00	Billable
3/1/2019	ADL 11800 Analysis Prepare for and attend discovery meet and confer at Severson; travel	0.00	1.50	0.00	Billable
3/4/2019	ADL 11802 Analysis Prepare discovery letter to court	0.00	3.00	0.00	Billable
3/6/2019	ADL 11808 Analysis Finalize discovery dispute letter for filing with the Court	0.00	1.00	0.00	Billable
4/8/2019	ADL 11830 Analysis Prepare for discovery hearing	0.00	1.50	0.00	Billable
4/9/2019	ADL 11831 Analysis Prepare for discovery hearing	0.00	1.00	0.00	Billable

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/9/2019	ADL 11832 Analysis Appear at discovery conference call & follow up scheduling	0.00	0.40	0.00	Billable
4/10/2019	ADL 11833 Analysis Review notes; prepare for discovery meeting; prepare discovery proposal	0.00	1.00	0.00	Billable
4/11/2019	ADL 11834 Analysis Attend discovery meet and confer at Severson office; follow-up email	0.00	1.70	0.00	Billable
4/23/2019	ADL 11844 Analysis Attention to data discovery, data expert	0.00	0.20	0.00	Billable
5/3/2019	ADL 11869 Analysis Draft letter to court re discovery dispute	0.00	1.00	0.00	Billable
5/6/2019	ADL 11870 Analysis Finish etter to court re discovery dispute	0.00	0.30	0.00	Billable
6/6/2019	ADL 11927 Analysis Prepare for and attend discovery hearing with Judge Donato; telephone call to Laszlo Ladi re discovery; telephone call to Kristin Kemnitzer re status; email to Laszlo Ladi	0.00	1.50	0.00	Billable
6/7/2019	ADL 11929 Analysis Prepare for discovery conference; email to Laszlo Ladi	0.00	2.50	0.00	Billable
6/10/2019	ADL 11930 Analysis Prepare for and attend discovery conference in court	0.00	3.00	0.00	Billable
6/10/2019	ADL 11931 Analysis Review and comment on agreement to be filed with court	0.00	0.30	0.00	Billable
6/12/2019	ADL 11936 Analysis Review PMK deposition topics and revise	0.00	1.00	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/17/2019	ADL 11944 Analysis Review and comment on PMK deposition subject matters	0.00	0.50	0.00	Billable
6/27/2019	ADL 11962 Analysis Review and comment on deposition notice	0.00	0.20	0.00	Billable
7/1/2019	ADL 11973 Analysis Review PMK categories and defense concerns; email to Natalie Lyons	0.00	0.50	0.00	Billable
7/9/2019	ADL 11984 Analysis Preliminary review and analysis of supplemental discovery from defendants	0.00	1.00	0.00	Billable
7/10/2019	ADL 11988 Analysis Further review and analysis of defendants' data production; memos	0.00	1.00	0.00	Billable
7/10/2019	ADL 11989 Analysis File review re plaintiffs' depositions; email to clients	0.00	1.00	0.00	Billable
7/10/2019	ADL 11990 Analysis PMK deposition preparation; legal research and records review	0.00	2.50	0.00	Billable
7/11/2019	ADL 11991 Analysis Deposition preparation	0.00	7.00	0.00	Billable
7/12/2019	ADL 11992 Analysis Review and respond to emails from Natalie Lyons, including meet and confer re supp responses	0.00	1.00	0.00	Billable
7/12/2019	ADL 11993 Analysis Prepare for depositions	0.00	4.00	0.00	Billable
7/15/2019	ADL 11994 Analysis Prepare for depositions	0.00	5.50	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
7/15/2019	ADL 11995 Analysis Review and respond to Laszlo Ladi's email re discovery compliance; email and conversations with Natalie Lyons	0.00	1.00	0.00	Billable
7/16/2019	ADL 11996 Analysis Prepare for depositions	0.00	7.00	0.00	Billable
7/17/2019	ADL 11998 Analysis Meeting with clients re depositions, followup with co-counsel	0.00	4.00	0.00	Billable
7/17/2019	ADL 11999 Analysis Prepare for depositions	0.00	1.00	0.00	Billable
7/17/2019	ADL 12000 Analysis Legal research re class certification	0.00	1.00	0.00	Billable
7/19/2019	ADL 12002 Analysis Review and prepare response to draft response to Laszlo Ladi's remail re discovery disputes; review comments from cocounsel and finish	0.00	1.50	0.00	Billable
7/22/2019	ADL 12005 Analysis Prepare for depositions	0.00	5.50	0.00	Billable
7/23/2019	ADL 12006 Analysis Travel to Dallas, prepare for depos	0.00	7.00	0.00	Billable
7/24/2019	ADL 12007 Analysis Prepare for and attend Veripro (Livingston deposition)	0.00	7.00	0.00	Billable
7/25/2019	ADL 12008 Analysis Prepare for and attend Nationstar (Loll) deposition; travel from Dallas to Oakland	0.00	7.00	0.00	Billable
7/29/2019	ADL 12013 Analysis Attention to new sets of document requests and interrogatories	0.00	2.00	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/29/2019	ADL	0.00	0.50	0.00	Billable
12014	Analysis Review file re discovery issues and email to defense counsel				
7/30/2019	ADL	0.00	0.30	0.00	Billable
12015	Analysis Draft net worth interrogatory				
7/30/2019	ADL	0.00	1.00	0.00	Billable
12016	Analysis Legal research re ascertainability				
7/31/2019	ADL	0.00	1.00	0.00	Billable
12023	Analysis Review data re class certification issues				
7/31/2019	ADL	0.00	0.70	0.00	Billable
12024	Analysis Legal research re standing				
8/2/2019	ADL	0.00	0.30	0.00	Billable
12035	Analysis Review email from Erik Kemp re discovery disputes; analysis; prepare for phone call				
8/2/2019	ADL	0.00	0.30	0.00	Billable
12037	Analysis Telephone call to Erik Kemp & Laszlo Ladi re document issues, memo to file				
8/2/2019	ADL	0.00	0.20	0.00	Billable
12039	Analysis Confirming email to Erik Kemp re discovery status				
8/6/2019	ADL	0.00	0.30	0.00	Billable
12043	Analysis Attention to class certification issues				
8/21/2019	ADL	0.00	0.40	0.00	Billable
12070	Analysis Prepare for and attend discovery conference call with defense counsel; followup email to cocounsel				
8/21/2019	ADL	0.00	0.20	0.00	Billable
12071	Analysis Email with Natalie Lyons re data				

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/22/2019	ADL 12075 Analysis Meeting with Natalie Lyons re data	0.00	0.30	0.00	Billable
8/27/2019	ADL 12082 Analysis Telephone call to Mark Lonergan and Erik Kemp re mediation, case schedule	0.00	0.30	0.00	Billable
8/28/2019	ADL 12087 Analysis Telephone call to Kristin Kemnitzer re case status, TBDs	0.00	0.30	0.00	Billable
8/30/2019	ADL 12090 Analysis Review and revise proposed continuance stipulation; research mediators	0.00	0.50	0.00	Billable
9/2/2019	ADL 12091 Analysis Attention to defendants' discovery responses	0.00	1.00	0.00	Billable
9/3/2019	ADL 12092 Analysis Attention to defendants' discovery responses	0.00	3.00	0.00	Billable
9/4/2019	ADL 12103 Analysis Telephone call to Evan Hendricks & followup	0.00	0.40	0.00	Billable
9/4/2019	ADL 12104 Analysis Collect documents for Mr. Hendricks; telephone call to Evan Hendricks & email	0.00	0.30	0.00	Billable
9/4/2019	ADL 12105 Analysis Attend discovery conference at Severson	0.00	1.70	0.00	Billable
9/4/2019	ADL 12106 Analysis Followup emails to Natalie Lyons and Kristin Kemnitzer, associated research	0.00	0.50	0.00	Billable
9/5/2019	ADL 12112 Analysis Review and reply to email from Erik Kemp re discovery disputes	0.00	0.60	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/5/2019	ADL	0.00	0.30	0.00	Billable
12113	Analysis Review and respond to Erik Kemp re calendar stip				
9/5/2019	ADL	0.00	2.50	0.00	Billable
12114	Analysis Revise discovery dispute letter to court				
9/6/2019	ADL	0.00	2.00	0.00	Billable
12115	Analysis Further revisions to discovery dispute letter to court				
9/6/2019	ADL	0.00	0.50	0.00	Billable
12116	Analysis Email with Mark Lonergan re net worth; review Nationstar 10-k				
9/6/2019	ADL	0.00	0.70	0.00	Billable
12117	Analysis Further attention to discovery dispute letter				
9/10/2019	ADL	0.00	0.50	0.00	Billable
12120	Analysis Review draft report from Evan Hendricks				
9/10/2019	ADL	0.00	0.70	0.00	Billable
12121	Analysis Telephone call to Kristin Kemnitzer re expert report and followup				
9/11/2019	ADL	0.00	8.00	0.00	Billable
12124	Analysis Consult with Evan Hendricks; attention to his expert report				
9/12/2019	ADL	0.00	0.50	0.00	Billable
12126	Analysis Legal research; Telephone call to Evan Hendricks				
9/12/2019	ADL	0.00	2.50	0.00	Billable
12128	Analysis Attention to expert report				
9/12/2019	ADL	0.00	0.80	0.00	Billable
12129	Analysis Conference with cocounsel re case calendar, tasks, mediation				
9/30/2019	ADL	0.00	1.50	0.00	Billable
12134	Analysis Attention to emails re rebuttal expert reports and depositions, settlement issues				

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
10/1/2019	ADL 12135 Analysis Review expert reports re rebuttals	0.00	0.30	0.00	Billable
10/1/2019	ADL 12136 Analysis Statutory analysis on remedial issues	0.00	0.50	0.00	Billable
10/1/2019	ADL 12141 Analysis Meeting with cocounsel re expert and settlement issues	0.00	1.20	0.00	Billable
10/1/2019	ADL 12142 Analysis Email to Mark Lonergan re settlement	0.00	0.40	0.00	Billable
10/1/2019	ADL 12146 Analysis Attention to Hendricks rebuttal report	0.00	2.00	0.00	Billable
10/2/2019	ADL 12151 Analysis Attention to settlement demand	0.00	2.50	0.00	Billable
10/3/2019	ADL 12153 Analysis Telephone call to Evan Hendricks re rebuttal report	0.00	0.30	0.00	Billable
10/3/2019	ADL 12154 Analysis Attention to settlement matrix	0.00	1.50	0.00	Billable
10/3/2019	ADL 12155 Analysis Telephone call to Kristin Kemnitzer re settlement matrix	0.00	0.50	0.00	Billable
10/3/2019	ADL 12156 Analysis Review data analysis of class member accounts; email to cocounsel	0.00	1.00	0.00	Billable
10/4/2019	ADL 12157 Analysis Conference call with co-counsel re settlement, data	0.00	0.70	0.00	Billable
10/4/2019	ADL 12158 Analysis Attention to settlement and data communications to opposing counsel	0.00	0.40	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
10/4/2019	ADL 12159 Analysis Attention to expert rebuttal report and disclosure	0.00	0.30	0.00	Billable
10/8/2019	ADL 12170 Analysis Telephone call to Bryan Kemnitzer re case status	0.00	0.20	0.00	Billable
10/8/2019	ADL 12173 Analysis Conference call with cocounsel re settlement and case issues	0.00	0.40	0.00	Billable
10/9/2019	ADL 12174 Analysis Review Ulzheimer rebuttal report; prepare for call with Evan Hendricks	0.00	0.50	0.00	Billable
10/10/2019	ADL 12176 Analysis Prepare for Ulzheimer deposition	0.00	6.50	0.00	Billable
10/11/2019	ADL 12177 Analysis Attend Ulzheimer deposition	0.00	4.00	0.00	Billable
10/11/2019	ADL 12180 Analysis Telephone call to Bryan Kemnitzer re mediation statement	0.00	0.30	0.00	Billable
10/11/2019	ADL 12181 Analysis Legal research re CCRAA	0.00	0.30	0.00	Billable
10/15/2019	ADL 12184 Analysis Legal research re mediation	0.00	0.30	0.00	Billable
10/17/2019	ADL 12187 Analysis Telephone call to Kristin Kemnitzer re Hendricks deposition	0.00	0.20	0.00	Billable
10/17/2019	ADL 12188 Analysis Review and revise mediation statement; associated legal research	0.00	5.00	0.00	Billable
10/18/2019	ADL 12189 Analysis Further attention to mediation statement; additional legal research	0.00	1.50	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/18/2019	ADL 12190 Analysis Comment on objections to subpoena to Evan Hendricks	0.00	0.70	0.00	Billable
10/21/2019	ADL 12192 Analysis Telephone call to Bryan Kemnitzer re mediation	0.00	0.30	0.00	Billable
10/21/2019	ADL 12193 Analysis Prepare for Evan Hendricks deposition	0.00	1.50	0.00	Billable
10/22/2019	ADL 12196 Analysis Telephone call to Evan Hendricks and Kristin Kemnitzer re deposition preparation	0.00	1.50	0.00	Billable
10/23/2019	ADL 12200 Analysis Review document lists from Evan Hendricks; related emails	0.00	0.20	0.00	Billable
10/23/2019	ADL 12201 Analysis Telephone call to Evan Hendricks re deposition and related email	0.00	0.20	0.00	Billable
10/24/2019	ADL 12204 Analysis Prepare for mediation	0.00	3.00	0.00	Billable
10/24/2019	ADL 12205 Analysis Legal research re defense credit reporting cases	0.00	1.00	0.00	Billable
10/25/2019	ADL 12206 Analysis Attend mediation	0.00	8.00	0.00	Billable
10/30/2019	ADL 12212 Analysis Review and comment on class certification outline; email to Natalie Lyons re class certification motion	0.00	0.70	0.00	Billable
10/30/2019	ADL 12213 Analysis Class certification preparation; review standing orders	0.00	0.30	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
10/30/2019	ADL 12215 Analysis Legal research re class certification motion	0.00	2.50	0.00	Billable
11/5/2019	ADL 12222 Analysis Telephone call to Bryan Kemnitzer; email to Judge Hernandez re defense settlement proposal	0.00	0.30	0.00	Billable
11/5/2019	ADL 12225 Analysis Legal research re class cert	0.00	3.00	0.00	Billable
11/6/2019	ADL 12226 Analysis Review class certification motion draft; meeting with Natalie Lyons & followup	0.00	0.80	0.00	Billable
11/6/2019	ADL 12227 Analysis Prepare for discovery hearing	0.00	0.50	0.00	Billable
11/6/2019	ADL 12228 Analysis Attention to class certification motion	0.00	1.50	0.00	Billable
11/7/2019	ADL 12229 Analysis Attend hearing on scheduling and discovery letter	0.00	2.50	0.00	Billable
11/8/2019	ADL 12230 Analysis Email to Erik Kemp re supplemental data production	0.00	0.30	0.00	Billable
11/21/2019	ADL 12236 Analysis Review and comment on letter to Judge Hernandez	0.00	1.00	0.00	Billable
12/2/2019	ADL 12238 Analysis Review McCoy settlement and application papers	0.00	1.50	0.00	Billable
12/3/2019	ADL 12245 Analysis Meeting with Natalie Lyons re objections, further attention to McCoy filings, legal research re class settlement approval	0.00	3.00	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
12/3/2019 12246	ADL Analysis Conference call with co-counsel re McCoy objections	0.00	0.70	0.00	Billable
12/5/2019 12248	ADL Analysis Telephone call to with Bryan and Kristin Kemnitzer re MCoy case	0.00	0.40	0.00	Billable
12/5/2019 12249	ADL Analysis Attention to discovery issues, emails with Erik Kemp; telcon with Evan Hendricks	0.00	0.50	0.00	Billable
12/5/2019 12250	ADL Analysis Legal research re settlement objections	0.00	0.50	0.00	Billable
12/5/2019 12252	ADL Analysis Legal research re release issues	0.00	1.00	0.00	Billable
12/5/2019 12253	ADL Analysis Review memo re McCoy objections	0.00	0.30	0.00	Billable
12/5/2019 12256	ADL Analysis Legal research re settlement approval issues	0.00	1.00	0.00	Billable
12/6/2019 12254	ADL Analysis Telephone call to clients re status	0.00	0.30	0.00	Billable
12/6/2019 12255	ADL Analysis Conference call with co-counsel re objections	0.00	0.70	0.00	Billable
12/6/2019 12257	ADL Analysis Prepare notice of pendency of McCoy case	0.00	1.20	0.00	Billable
12/7/2019 12259	ADL Analysis Attention to settlement objections	0.00	1.00	0.00	Billable
12/8/2019 12261	ADL Analysis Review and comment on objections list	0.00	0.70	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
12/9/2019	ADL	0.00	1.50	0.00	Billable
12264	Analysis Legal research re objections				
12/9/2019	ADL	0.00	0.30	0.00	Billable
12265	Analysis Telephone calls to cocounsel re McCoy status				
12/9/2019	ADL	0.00	2.50	0.00	Billable
12267	Analysis Draft settlement objections				
12/10/2019	ADL	0.00	4.00	0.00	Billable
12266	Analysis Draft settlement objections				
12/10/2019	ADL	0.00	0.60	0.00	Billable
12268	Analysis Attend Hendricks deposition by telephone; brief followup with Mr. Hendricks				
12/10/2019	ADL	0.00	2.00	0.00	Billable
12269	Analysis Further review of draft and editing re McCoy objections				
12/11/2019	ADL	0.00	3.00	0.00	Billable
12270	Analysis Further review of draft and editing re McCoy objections				
12/11/2019	ADL	0.00	0.20	0.00	Billable
12271	Analysis Review and editing of Notice of Pendency of McCoy case				
12/11/2019	ADL	0.00	1.50	0.00	Billable
12272	Analysis Prepare declarations in support of objections				
12/11/2019	ADL	0.00	0.50	0.00	Billable
12273	Analysis Telephone call to Kristin Kemnitzer re objections				
12/12/2019	ADL	0.00	0.30	0.00	Billable
12274	Analysis Telephone call to Bryan and Kristin Kemnitzer re objections				
12/12/2019	ADL	0.00	0.20	0.00	Billable
12275	Analysis Telephone call to Jason Saccuzzo re objections				

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/12/2019	ADL	0.00	4.00	0.00	Billable
12277	Analysis Attention to objections and supporting declarations				
12/13/2019	ADL	0.00	2.00	0.00	Billable
12281	Analysis Finish objections and supporting motion, proof for filing				
12/18/2019	ADL	0.00	0.30	0.00	Billable
12283	Analysis Prepare notice of appearance re McCoy				
12/18/2019	ADL	0.00	0.20	0.00	Billable
12284	Analysis Telephone call to Kristin Kemnitzer re McCoy appearance and MSC				
12/19/2019	ADL	0.00	0.30	0.00	Billable
12289	Analysis Meeting with Natalie Lyons re class certification motion				
12/28/2019	ADL	0.00	2.00	0.00	Billable
12303	Analysis Draft class certification motion				
1/3/2020	ADL	0.00	5.00	0.00	Billable
12304	Analysis Draft class certification motion				
1/3/2020	ADL	0.00	0.00	0.00	Billable
12305	Analysis Draft class certification motion				
1/4/2020	ADL	0.00	5.00	0.00	Billable
12306	Analysis Draft class certification motion				
1/5/2020	ADL	0.00	3.50	0.00	Billable
12307	Analysis Draft class certification motion				
1/7/2020	ADL	0.00	1.00	0.00	Billable
12321	Analysis Review depositions, exhibits to support class certification motion				
1/7/2020	ADL	0.00	0.70	0.00	Billable
12322	Analysis Legal research ISO class cert				

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
1/8/2020	ADL 12325 Analysis Class certification drafting	0.00	7.00	0.00	Billable
1/9/2020	ADL 12326 Analysis Class certification drafting	0.00	2.50	0.00	Billable
1/9/2020	ADL 12329 Analysis Attention to record cites ISO class certification motion	0.00	1.50	0.00	Billable
1/11/2020	ADL 12331 Analysis Draft class certification motion and prepare supporting documents	0.00	5.00	0.00	Billable
1/12/2020	ADL 12332 Analysis Draft class certification motion and prepare supporting documents	0.00	7.00	0.00	Billable
1/13/2020	ADL 12333 Analysis Attend to class certification filing	0.00	8.00	0.00	Billable
1/14/2020	ADL 12334 Analysis Draft class certification motion and prepare supporting documents	0.00	4.00	0.00	Billable
1/16/2020	ADL 12340 Analysis Telephone call to Bryan and Kristen Kemnitzer re objections	0.00	0.50	0.00	Billable
1/20/2020	ADL 12343 Analysis Review McCoy motion for final approval and fees	0.00	0.80	0.00	Billable
1/22/2020	ADL 12346 Analysis Review and comment on meet and confer letter re McCoy	0.00	0.30	0.00	Billable
1/22/2020	ADL 12347 Analysis Review and comment on response draft to motion for final approval	0.00	4.50	0.00	Billable
1/23/2020	ADL 12351 Analysis Further attention to opposition to final approval motion, emails and phone calls with cocounsel	0.00	0.50	0.00	Billable

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/27/2020	ADL	0.00	0.40	0.00	Do Not Bill
12360	Analysis Conference call with Magistrate Judge Ryu re MSC		0.40		
1/27/2020	ADL	0.00	0.20	0.00	Billable
12366	Analysis Review and calendar Mandatory Settlement Conference Order				
2/10/2020	ADL	0.00	1.50	0.00	Billable
12397	Analysis Review and analyze responses to Toland objections				
2/11/2020	ADL	0.00	1.30	0.00	Billable
12398	Analysis Further attention to party briefs in support of McCoy settlement; memo to Kristin Kemnitzer re hearing				
2/12/2020	ADL	0.00	0.80	0.00	Billable
12399	Analysis Telephone call to Kristin Kemnitzer re McCoy settlement argument				
2/13/2020	ADL	0.00	0.50	0.00	Billable
12401	Analysis Prepare for McCoy hearing				
2/14/2020	ADL	0.00	8.00	0.00	Billable
12402	Analysis Travel to San Diego; attend McCoy final approval hearing; consults with Kristin Kemnitzer				
2/18/2020	ADL	0.00	4.50	0.00	Billable
12404	Analysis Review opposition to class certification motion; legal research				
2/19/2020	ADL	0.00	6.00	0.00	Billable
12405	Analysis Draft reply ISO class certification and associated legal research and analysis				
2/20/2020	ADL	0.00	7.00	0.00	Billable
12407	Analysis Draft reply ISO class certification and associated legal research and analysis				
2/20/2020	ADL	0.00	4.50	0.00	Billable
12408	Analysis Draft reply ISO class certification and associated legal research and analysis				

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
2/23/2020	ADL 12409 Analysis Draft reply ISO class certification motion	0.00	8.00	0.00	Billable
2/24/2020	ADL 12411 Analysis Draft reply ISO class cert	0.00	7.00	0.00	Billable
2/24/2020	ADL 12415 Analysis Finish reply ISO class cert	0.00	5.00	0.00	Billable
3/17/2020	ADL 12461 Analysis Attention to change of hearing date	0.00	0.20	0.00	Billable
3/25/2020	ADL 12472 Analysis Email with Erik Kemp re hearing date; prepare stip and order	0.00	0.30	0.00	Billable
3/30/2020	ADL 12478 Analysis Review Order approving McCoy settlement & related email	0.00	0.40	0.00	Billable
3/30/2020	ADL 12479 Analysis Review Walker decision	0.00	0.30	0.00	Billable
4/2/2020	ADL 12482 Analysis Attention to email re case status	0.00	0.20	0.00	Billable
4/10/2020	ADL 12487 Analysis Attention to scheduling stip; emails with cocounsel	0.00	0.40	0.00	Billable
4/15/2020	ADL 12488 Analysis Review McCoy approval order and draft response	0.00	2.00	0.00	Billable
4/15/2020	ADL 12489 Analysis Review proposed letter to MJ Ryu and comment	0.00	0.30	0.00	Billable
4/21/2020	ADL 12494 Analysis Review defense motions, emails with cocounsel; attention to briefing schedule	0.00	0.70	0.00	Billable

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/22/2020	ADL 12499 Analysis Review and analyze summary judgment motion; confer with cocounsel	0.00	2.00	0.00	Billable
4/22/2020	ADL 12500 Analysis Attention to briefing stip and order	0.00	0.40	0.00	Billable
4/26/2020	ADL 12506 Analysis Legal research and drafting re opposition to MSJ	0.00	2.50	0.00	Billable
4/27/2020	ADL 12507 Analysis Legal research and drafting re opposition to MSJ	0.00	0.30	0.00	Billable
4/27/2020	ADL 12512 Analysis Deposition review and capture re Livingston testimony	0.00	2.00	0.00	Billable
4/28/2020	ADL 12513 Analysis Deposition review and capture re Loll testimony	0.00	2.00	0.00	Billable
4/28/2020	ADL 12515 Analysis Draft opposition to MSJ	0.00	3.50	0.00	Billable
4/29/2020	ADL 12517 Analysis Attention to scheduling, emails	0.00	0.30	0.00	Billable
4/29/2020	ADL 12518 Analysis Draft opposition to MSJ	0.00	3.00	0.00	Billable
5/4/2020	ADL 12450 Analysis Conference call with Judge Ryu re MSC	0.00	0.40	0.00	Billable
5/27/2020	ADL 12529 Analysis Draft opposition to MSJ	0.00	4.00	0.00	Billable
5/29/2020	ADL 12530 Analysis Draft opposition to MSJ	0.00	4.00	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/30/2020	ADL	0.00	7.00	0.00	Billable
12532	Analysis Draft opposition to MSJ				
5/31/2020	ADL	0.00	3.00	0.00	Billable
12533	Analysis Draft opposition to exclusion motion, research				
6/1/2020	ADL	0.00	3.00	0.00	Billable
12534	Analysis Draft opposition to exclusion motion, research				
6/1/2020	ADL	0.00	7.00	0.00	Billable
12535	Analysis Draft opposition to MSJ				
6/2/2020	ADL	0.00	3.00	0.00	Billable
12536	Analysis Draft opposition to exclusion motion, research				
6/2/2020	ADL	0.00	1.00	0.00	Billable
12537	Analysis Conference call with cocounsel, emails re MSJ				
6/3/2020	ADL	0.00	7.00	0.00	Billable
12538	Analysis Draft opposition to exclusion motion, research				
6/4/2020	ADL	0.00	5.00	0.00	Billable
12539	Analysis Draft opposition to exclusion motion, research				
6/5/2020	ADL	0.00	7.00	0.00	Billable
12541	Analysis Further drafting and assembly of opp to MSJ				
6/6/2020	ADL	0.00	5.00	0.00	Billable
12542	Analysis Drafting of oppositions to MSJ and motion to exclude				
6/8/2020	ADL	0.00	3.50	0.00	Billable
12543	Analysis Finalize motion oppositions				
6/18/2020	ADL	0.00	0.60	0.00	Billable
12555	Analysis Review revised settlement matrix; emails with Natalie Lyons				

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
6/18/2020	ADL 12556 Analysis Review MSC order	0.00	0.20	0.00	Billable
7/9/2020	ADL 12576 Analysis Conference call with co-counsel re settlement conference	0.00	0.90	0.00	Billable
7/13/2020	ADL 12577 Analysis Attention to MSC brief filings	0.00	3.50	0.00	Billable
7/13/2020	ADL 12578 Analysis Attention to MSC brief filings	0.00	3.50 3.50	0.00	Do Not Bill
7/14/2020	ADL 12579 Analysis Further attention to mediation statements	0.00	3.50	0.00	Billable
7/14/2020	ADL 12580 Analysis Further attention to mediation statements	0.00	3.50	0.00	Billable
7/15/2020	ADL 12581 Analysis Review reply briefs in support of motions for summary judgment and exclusion	0.00	0.50	0.00	Billable
7/27/2020	ADL 12582 Analysis Prepare for and appear at MSC	0.00	4.50	0.00	Billable
7/28/2020	ADL 12583 Analysis Revise motion continuance stip	0.00	0.50	0.00	Billable
8/3/2020	ADL 12660 Analysis Attention to fee demand, settlement	0.00	0.50	0.00	Billable
8/5/2020	ADL 12667 Analysis Attention to credit reporting requirements; email to Erik Kemp	0.00	1.00	0.00	Billable
8/17/2020	ADL 12695 Analysis Legal research re vicarious liability	0.00	0.60	0.00	Billable

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
8/18/2020	ADL 12689 Analysis Review and edit mediation matrix re identification issues and credit reporting	0.00	1.50	0.00	Billable
8/21/2020	ADL 12706 Analysis Attention to status report	0.00	0.30	0.00	Billable
8/24/2020	ADL 12709 Analysis Telephone call to Kristin Kemnitzer and settlement conference prep	0.00	0.30	0.00	Billable
8/25/2020	ADL 12712 Analysis Attend settlement conference & followup with Kristin and clients	0.00	4.00	0.00	Billable
9/22/2020	ADL 12731 Analysis Attention to administrator proposals	0.00	0.30	0.00	Billable
9/29/2020	ADL 12745 Analysis Attention to administrator estimates	0.00	0.50	0.00	Billable
9/29/2020	ADL 12746 Analysis Attention to settlement agreement	0.00	3.00	0.00	Billable
9/30/2020	ADL 12751 Analysis Attention to settlement agreement	0.00	3.50	0.00	Billable
10/1/2020	ADL 12753 Analysis Review and edit class notice	0.00	3.00	0.00	Billable
10/2/2020	ADL 12754 Analysis Further attention to class notice and claim form	0.00	1.50	0.00	Billable
10/31/2020	ADL 12796 Analysis Review and revise class notice	0.00	0.50	0.00	Billable
11/2/2020	ADL 12817 Analysis Review and revise prelim and final approval orders	0.00	0.50	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/25/2020	ADL 12832 Analysis Telcon with Kristin Kemnitzer re settlement agreement, preliminary approval	0.00	0.20	0.00	Billable
12/13/2020	ADL 12849 Analysis Review and comment on settlement draft	0.00	0.40	0.00	Billable
1/3/2021	ADL 12884 Analysis Review and edit preliminary approval motion	0.00	6.50	0.00	Billable
1/4/2021	ADL 12885 Analysis Draft dec ISO preliminary approval	0.00	1.50	0.00	Billable
1/8/2021	ADL 12892 Analysis Attention to preliminary approval motion	0.00	0.30	0.00	Billable
1/11/2021	ADL 12894 Analysis Draft stip to shorten time, including local rule research	0.00	0.30	0.00	Billable
1/12/2021	ADL 12897 Analysis Research Banks response rate and revise declaration	0.00	0.50	0.00	Billable
4/2/2021	ADL 13029 Analysis Conference call re preliminary approval prep	0.00	0.80	0.00	Billable
4/28/2021	ADL 13047 Analysis Attention to claim form, notice, and credit reporting response	0.00	2.50	0.00	Billable
5/11/2021	ADL 13055 Analysis Review and comment on joint statement	0.00	0.30	0.00	Billable
5/11/2021	ADL 13056 Analysis Conference call with Severson and followup	0.00	0.50	0.00	Billable
5/12/2021	ADL 13060 Analysis Attention to revisions to settlement to address the Court's concerns	0.00	1.00	0.00	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/14/2021	ADL 13066 Analysis Attention to joint statement, emails with cocounsel	0.00	0.50	0.00	Billable
8/12/2021	ADL 13142 Analysis Telcon with Kristin Kemnitzer re settlement; legal research; email to Kristin re settlement	0.00	1.50	0.00	Billable
8/13/2021	ADL 13143 Analysis Further attention to settlement; legal research and cocounsel emails	0.00	1.00	0.00	Billable
10/21/2021	ADL 13213 Analysis Review and edit revised preliminary approval order	0.00	0.50	0.00	Billable
10/25/2021	ADL 13217 Analysis Review and comment on revisions to PAO	0.00	0.30	0.00	Billable
10/29/2021	ADL 13221 Analysis Emails to defense counsel and JND re status	0.00	0.30	0.00	Billable
TOTAL Billable Fees			555.80		\$0.00

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
3/29/2018	Expense 12198 Experts Philip Stark fee (1/2 paid to Kemnitzer firm)	4950.00	1.000	4,950.00	Billable
8/1/2018	Expense 11605 In-House Copying In-house copying charges for August 2018 (08/01/18-09/03/18)	0.20	38.000	7.60	Billable
10/1/2018	Expense 11670 In-House Copying In-house copying charges for October 2018 (10/01/18- 10/31/18)	0.20	18.000	3.60	Billable
11/1/2018	Expense 11705 In-House Copying In-house copying charges for November 2018 (11/01/18- 11/30/18)	0.20	61.000	12.20	Billable

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
12/1/2018	Expense	0.20	61.000	12.20	Billable
11728	In-HouseCopying In-house copying charges for December 2018 (12/01/18- 01/01/19)				
1/2/2019	Expense	0.20	186.000	37.20	Billable
11759	In-HouseCopying In-house copying charges for January 2019 (01/02/19-01/31/19)				
2/1/2019	Expense	0.20	124.000	24.80	Billable
11795	In-HouseCopying In-house copying charges for February 2019 (02/01/19-02/28/19)				
4/9/2019	ADL	30.00	1.000	30.00	Billable
11863	Court Fees Courtcall appearance fee for Discovery Conference				
6/4/2019	ADL	0.20	127.000	25.40	Billable
11966	In-HouseCopying In-house copying charges for June 2019 (06/04/19- 06/30/19)				
6/6/2019	Expense	30.00	1.000	30.00	Billable
11977	Other Expense Courtcall for discovery hearign before Judge Donato				
7/1/2019	ADL	0.20	2065.000	413.00	Billable
12027	In-HouseCopying In-house copying charges for July 2019 (07/01/19- 07/31/19)				
7/19/2019	ADL	171.33	1.000	171.33	Billable
12004	FedEx/Postage UPS charges for sending deposition exhibits to Dallas				
7/23/2019	ADL	30.00	1.000	30.00	Billable
12010	Travel Cab fare from Dallas airport to hotel				
7/25/2019	ADL	30.00	1.000	30.00	Billable
12011	Travel Cab fare from hotel to Dallas airport				
7/25/2019	ADL	385.46	1.000	385.46	Billable
12095	Travel Hotel Indigo, Dallas, for PMK depositions				
8/26/2019	ADL	1577.10	1.000	1,577.10	Billable
12077	DepoTranscript Loll Deposition Transcript				

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
8/26/2019	ADL	1862.70	1.000	1,862.70	Billable
12078	DepoTranscript Livingston Deposition Transcript				
9/4/2019	ADL	0.20	109.000	21.80	Billable
12137	In-HouseCopying In-house copying charges for September 2019 (09/04/19- 09/30/19)				
10/1/2019	ADL	0.20	873.000	174.60	Billable
12216	In-HouseCopying In-house copying charges for October 2019 (10/1/19- 10/31/19)				
10/2/2019	ADL	25.80	1.000	25.80	Billable
12338	Online Research PACER research				
10/7/2019	ADL	2000.00	1.000	2,000.00	Billable
12167	Experts Evan Hendricks Rebuttal Report				
10/9/2019	ADL	1.30	1.000	1.30	Billable
12339	Online Research PACER research				
10/10/2019	ADL	3250.00	1.000	3,250.00	Billable
12179	Mediator/Arbitr Mediation fee to ADR services				
10/11/2019	ADL	1336.50	1.000	1,336.50	Billable
12178	Experts Expert fee for John Ulzheimer deposition				
10/12/2019	Expense	300.00	1.000	300.00	Billable
12209	Research Legislative History CCRAA				
10/13/2019	Expense	15.77	1.000	15.77	Billable
12211	FedEx/Postage FedEx to ADR Services re mediation				
10/18/2019	Expense	1272.54	1.000	1,272.54	Billable
12210	DepoTranscript Ulzheimer deposition transcript				
10/22/2019	Expense	495.00	1.000	495.00	Billable
12224	DepoTranscript Video link for Ultzheimer deposition				

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Pre-bill Worksheet

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Nationstar.Class: Taquelia Washington Toland and Georgia Toland (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
11/1/2019	ADL 12240 In-House Copying In-house copying charges for November 2019 (11/1/19- 11/30/19)	0.20	161.000	32.20	Billable
12/1/2019	ADL 12312 In-House Copying In-house copying charges for December 2019 (12/1/2019- 01/06/2020). Includes 1222.01 (494) and 1222.02 (628).	0.20	1122.000	224.40	Billable
12/2/2019	ADL 12337 Online Research McCoy court records from PACER	94.30	1.000	94.30	Billable
12/19/2019	ADL 12336 Travel Airfare to San Diego re McCoy	167.96	1.000	167.96	Billable
12/26/2019	ADL 12390 Travel San Diego airfare	258.00	1.000	258.00	Billable
1/7/2020	ADL 12377 In-House Copying In-house copying charges for January 2020 (01/07/2020- 02/02/2020)	0.20	776.000	155.20	Billable
1/27/2020	ADL 12361 Depo Transcript Evan Hendricks deposition (Vol 2)	186.50	1.000	186.50	Billable
6/8/2020	Expense 12572 FedEx/Postage Courtesy copies of motion oppositions to court	15.59	1.000	15.59	Billable
7/17/2020	Expense 12574 Online Research PACER charges first quarter 2020	44.10	1.000	44.10	Billable
7/17/2020	Expense 12575 Online Research PACER charges second quarter 2020	157.10	1.000	157.10	Billable
TOTAL Billable Costs					\$19,831.25
Total of Fees (Time Charges)				Amount	Total
					\$0.00

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Pre-bill Worksheet

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Nationstar.Class:Taquelia Washington Toland and Georgia Toland (continued)

	Amount	Total
Total of Costs (Expense Charges)		\$19,831.25
Total new charges		\$19,831.25
New Balance Current	\$19,831.25	
Total New Balance		\$19,831.25

EXHIBIT B

Toland v. Nationstar
HERA Time Entries from AbacusLaw System

Date	Description of Services	Duration
6/10/2019	Attended court-mandated meet and confer re: discovery. Drafted typewritten discovery agreement reached during meet/confer. Sent to Arthur/Kristen (linked).	3.0
6/11/2019	Edited 30(b)(6) deposition notice.	0.7
6/18/2019	Edits to joint cmc in state case. Sent to Arthur/Kristin. Also received dates in response to our R. 306b depo notices / requests to depose Ps. Emails linked.	0.3
6/21/2019	Call with TW and Kristin K re: depositions and depo prep. She has concerns about Georgia's work schedule and taking 3 days off in the same week. KK suggested Georgia's depo and TW's depo being scheduled for different days, so that neither has to take off more than one day for the actual depo. And as to prep TW will talk with Georgia about whether they can make it work to prep on the suggested dates and/or other dates that work. They'll get back to us early next week.	0.2
6/21/2019	Call w KK to TW re: depositions. Left VM.	0.1
6/25/2019	Edited 30(b)(6) notice and sent to Arthur, Kristin, Sean.	0.9
6/27/2019	Revised depo notice; sent to AL for approval; finalized and sent to BO for sending by mail with POS.	0.5
6/28/2019	Reviewed Ds' objections. Very brief research on overbroad" 30b6 categories. Internal email re: next steps. Consultation w/Arthur. Responded to Ds' counsel and sent depo notice. Linked"	0.7
7/2/2019	Coordinating response to Ds' concerns re: PMK depositions	0.5
7/11/2019	Reviewed supplemental responses and compared to discovery agreement. Drafted email to Erik.	1.5
7/15/2019	Reviewed docs / drafted plan for preparing Ps for depositions	3.5
7/17/2019	Review of PMK depo exhibits	1.0
7/17/2019	Meeting with TW and GT to prep for depositions on 7/18-19.	3.0
7/23/2019	Travel to Dallas / prep	8.0
7/24/2019	Deposition: 30b6 for Veripro (Phillip Livingston)	4.0
7/25/2019	Deposition: 30b6 for Nationstar (AJ Toll)	4.0
7/26/2019	Drafted 2nd set of ROGS/RFPs.	1.3
8/7/2019	Emailed AT re: docs needed from Georgia/Taquelia. Sent email to TW/GT.	0.4
8/15/2019	Reviewing data produced by Defendants.	0.5
8/19/2019	Analyzed data from Veripro. Sent preliminary analysis to Arthur.	1.2
8/19/2019	Left VM for Georgia about addt'l discovery.	0.0
8/28/2019	Spoke with AL about supplemental rogs. Finished drafting them, redacting credit statement/auto loan statement. Sent email to GT/TW. Will send to Ds tomorrow.	1.0
8/29/2019	Finalized supp response to Rogs and sent to Erik/Lazslo	0.5
9/2/2019	Reviewed Ds' 8/30 discovery responses and sent notes to AL and KK.	1.7
9/3/2019	Met with AL and drafted email language to send to Ds. Reviewed his draft and commented.	0.8
9/5/2019	Revised discovery dispute letter.	1.2
9/5/2019	Drafted discovery dispute letter and sent to AL/KK. Linked.	3.0
9/12/2019	Call with AL and KK re: expert discovery, class cert and mediation.	1.0
9/17/2019	Drafted email to AL/KK w/findings re: actual damages and suggestions as to expert rebuttals.	0.5

Toland v. Nationstar
HERA Time Entries from AbacusLaw System

9/17/2019	Reviewing NCLC FCRA treatise.	1.0
9/18/2019	Research on actual damages""	1.0
9/18/2019	Conversation w/Kristin re: actual damages, settlement matrix, Ds' data, class cert.	0.9
9/18/2019	Conversation with Kristin K. re: actual damages. Going to research 9th Cir cases and FCRA compared to CCRA.	0.2
9/27/2019	Research on actual damages	1.7
10/3/2019	Analyzing Ds' data, providing estimate on class size.	4.0
10/9/2019	Developed spreadsheet containing Ps' estimated debt collection class and sent to opposing counsel.	1.0
10/17/2019	Edits to mediation statement	2.0
10/17/2019	Research on federal cases re: whether actual damage is req'd for statutory damages under CCRAA	0.7
10/23/2019	Reviewed Kuns v. Ocwen as distinguishing precedent to the Donato (Gray v. Ocwen) case in Ds' mediation brief. Sent AL email.	0.4
1/4/2020	Drafting CC brief	2.0
1/6/2020	Drafting CC brief	2.5
1/7/2020	Drafting CC brief	8.5
1/8/2020	Editing CC draft	6.0
1/12/2020	Drafting my declaration (w/data analysis)	5.0
1/12/2020	Edits to CC draft	3.0
1/13/2020	Edits to CC	2.0
1/14/2020	Finalizing my dec	1.0
2/23/2020	Drafting reply to CC	4.0
2/25/2020	Editing reply to CC	3.0
4/21/2020	Drafted/finalized draft of stip re: MSJ/Daubert schedule. Sent to Defs	1.2
4/22/2020	Call with AL about MSJ strategy	0.4
4/22/2020	Reviewed Defs' MSJ. Sent notes/plan to AL	0.9
5/28/2020	Drafting MSJ	1.5
5/29/2020	Drafting MSJ	4.3
5/30/2020	Drafting MSJ	8.0
6/3/2020	Edits to MSJ draft	5.0
6/5/2020	Started drafting Intro to MSJ	1.1
6/5/2020	Drafted decs for Plaintiffs, sent to AL	0.9
6/5/2020	Call with TW & GT re: declarations for MSJ.	0.3
6/6/2020	Finished Intro to MSJ Opp	2.7
7/10/2020	Edits to confidential settlement statement	0.8
7/13/2020	Edits to settlement demand	0.8
7/27/2020	Attending mandatory settlement conference	4.5
7/28/2020	Draft stip to postpone MSJ/CC hearing	0.9
	TOTAL	128.2