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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
Situated,

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 KRISTIN
KEMNITZER IN SUPPORT OF
MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS AND
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

I, KRISTIN KEMNITZER, DECLARE:

1. I am an attorney licensed to practice law in California. Our law firm, Kemnitzer, Barron
& Krieg LLP, was retained by representative Taquelia Washington Toland and Georgia Toland

1 (“Class Representatives” or “Plaintiffs”) in this litigation against Nationstar Mortgage LLC and
2 Veripro Solutions Inc. (“Defendants”). I have personal knowledge of the information stated
3 below, based on my participation in the litigation and my review of the file, and am competent to
4 testify thereto.

5 2. My law firm, Kemnitzer Barron & Krieg LLP, has extensive experience representing
6 consumers in class actions and unfair business litigation. I make this declaration in support of
7 Plaintiffs’ Motion for Attorneys’ Fees in this action.

8 3. The facts and procedural history stated in the accompanying memorandum in support of
9 this motion are accurate to the best of my knowledge based upon my review of the file,
10 discussions with opposing counsel and co-counsel, evaluation of documents produced, research
11 and discovery in this matter.

12 **I. PLAINTIFFS ARE ENTITLED TO ATTORNEYS’ FEES AND COSTS**

13 4. Paragraph 4.6 of the Settlement Agreement reads as follows:

14 (a) Plaintiffs will be considered the prevailing parties and Class Counsel will
15 be entitled to an award of Attorneys’ Fees and Expenses as provided in this
16 subsection. Concurrently with the mailing of the Class Notice, Class Counsel may
17 apply to the Court for an award of Attorneys’ Fees and Expenses not to exceed
18 \$390,000. Defendants may oppose such application, but will pay an Attorney’s
19 Fees and Expenses award in the amount awarded by the Court, not to exceed
20 \$390,000, for all services provided on behalf of the Class Representatives and the
21 Settlement Class. Defendants shall issue an IRS Form 1099-MISC solely to the
22 respective Class Counsel for the amount paid to such counsel pursuant to this
23 section and to no other person or entity. Notwithstanding the foregoing,
24 Defendants may issue additional Form 1099-MISCs to other persons or entities
25 only if ordered to do so by the IRS, and any compliance by Defendants with such
26 an order or requirement shall not be a breach of this Agreement. If ordered to
27 issue any Form 1099-MISCs to other persons or entities by the IRS, Defendants
28 shall provide documentation of any such order or requirement to Class Counsel.
Class Counsel shall be solely and legally responsible to pay any and all applicable
taxes on their attorneys’ fees award and shall hold harmless Defendants, and
counsel for Defendants, from any claim or liability for taxes, penalties, or interest
arising from their attorneys’ fee award.

(b) Class Counsel shall be solely responsible for paying any monies due to
any and all other counsel for Plaintiffs and the Class, out of the Attorneys’ Fees
and Expenses approved by the Court. Defendants shall not be liable for any
claims ensuing from the distribution of the Attorneys’ Fees and Expenses.

(c) Class Counsel and the Class Representatives expressly disclaim any right
to recover attorneys’ fees and costs in the Action in excess of the amount awarded
by the Court from any person or entity. Class Counsel and the Class
Representatives agree that the amounts of such Attorneys’ Fees and Expenses

1 awarded shall compensate them for all legal work in the Action up to and
 2 including the Effective Date, as well as for all legal work and costs that may be
 incurred in the Action after the Effective Date.

3 (d) This Settlement is not conditioned upon the Court awarding the amounts
 4 sought by Class Counsel as an award of Attorneys’ Fees and Expenses. If the
 amount awarded by the Court is less than what was sought by Class Counsel, the
 5 remaining provisions of this Settlement Agreement shall be binding and effective.

6 **II. FEES AND COSTS INCURRED; REQUEST FOR FEES AND COSTS**

7 5. In this case, as of November 19, 2021, Class Counsel has put in 712.00 *audited* hours of
 8 attorney and staff time, totaling \$439,525.00 in fees, and \$17,762.34 in out-of-pocket expenses
 9 prosecuting this matter.¹

<u>Kemnitzer, Barron & Krieg, LLP</u>	
Lodestar (from start of case through November 19, 2021) Time slip summary in BillQuick software (Exhibit A); detailed time slips in BillQuick software (Exhibit B).	\$439,525.00
Total Costs: (from start of case through November 19, 2021) (Exhibits A, B)	\$17,762.34

15 6. A summary of the fees for each specific individual at our firm from the start of the action
 16 through November 19, 2021 is as follows (**Exhibit A**):

<u>Timekeeper</u>	<u>Hours Spent</u>	<u>Fees</u>
Mark Chavez (@ \$950/hr.)	17.80	\$16,910.00
Bryan Kemnitzer (@ \$850/hr.)	77.90	\$66,215.00
Kristin Kemnitzer (@ \$650/hr.)	491.40	\$319,410.00
Adam McNeile (@ \$650/hr.)	7.20	\$4,680.00
Sean Barry (@ \$275/hr.)	117.70	\$32,310.00

21 **III. USE OF BILLQUICK FOR TIME SLIPS**

22 7. Our firm utilizes computer software called “BillQuick” that assists in keeping track of
 23 actual time expended in performing various legal tasks on any given case. Our firm bills in
 24 minimum increments of one tenth of an hour (0.1), or six minutes. We do not round up.

25 8. Insofar as the records of fees, costs, and expenses are concerned regarding each
 26 individual case file in the office, I am a custodian of those records. These time records are

27 _____
 28 ¹ Since running the fees and costs on November 19, 2021, Kemnitzer Barron & Krieg has put in fewer than ten hours
 of attorney and staff time, but that time has not been counted in this motion.

1 routinely prepared in the ordinary course of business, by the individuals with personal
2 knowledge of the tasks performed and who have the responsibility to enter their time into the
3 computer, at or near the time each task is actually performed.

4 9. In my role as Managing Partner, I used billing judgment to ensure that all time expended
5 on this case was necessary to reach the excellent settlement obtained. I extensively reviewed
6 every single one of our firms' billing entries for this case and cut all time I deemed to be
7 excessive or unnecessary for the prosecution of this matter.

8 10. I removed one partner's time who billed fewer than five hours to the case, and five
9 separate support staff's time totaling more than fifty-three hours. I also reviewed all detailed time
10 entries for the remaining staff and attorneys, removed unclear or unnecessary billing entries, and
11 otherwise used my billing judgment in order to ensure that only necessary time entries remained.

12 11. In total, I cut over 107 hours of time, totaling 52,778.50 in lodestar.

13 12. Within BillQuick, staff and attorneys use task-based billing codes to categorize time.

14 **L100 – Case Assessment and Development**

15 13. KBK's "L100" billing category includes Class Counsel's work performed assessing and
16 developing the theories underlying the case and performing the paralegal and development tasks
17 necessary to prosecute and resolve the case. Accordingly, one of the paramount aspects of this
18 billing category is that it includes Class Counsel's pre-litigation meetings with the potential
19 client, the assessment as to the viability of the potential case, and paralegal time during the
20 prosecution of the case. KBK is *very* selective with respect to cases it takes, agreeing to represent
21 less than 5% of potential clients who contact our office. This billing category also includes time
22 spent on paralegal tasks performed by Class Counsel's senior paralegal working on this matter.
23 All of the time spent performing the tasks in this billing category is documented extensively in
24 Class Counsel's billing records. In all, Class Counsel's attorneys and staff spent 97.7 hours and
25 \$32,595.00 performing work in this billing category.

26 **L160 – Settlement/Non-Binding ADR**

27 14. The "L160" billing category includes time Class Counsel spent preparing for and
28 participating in the mediation and two settlement conferences in this case as well as time spent

1 preparing and negotiating the terms of a highly technical settlement agreement, together with the
2 exhibits thereto, and working extensively with opposing counsel to complete the settlement. In
3 all, Class Counsel's attorneys and staff spent 145.80 hours and \$101,265.00 performing work in
4 this billing category.

5 **L200 – Pre-Trial Pleadings and Motions**

6 15. The "L200" billing category includes the time Class Counsel's attorneys and staff
7 expended on drafting, reviewing, revising, and finalizing (i) the complaint; (ii) Motion for
8 Remand; (iii) Motion for Class Certification; (iv) Opposition to Motion for Summary Judgment;
9 (v) Opposition to Motion to Exclude Expert (vi) Motion for Preliminary Approval; (vi) status
10 conference statements, and (vii) the instant Motion for Attorneys' fees and Costs. It also includes
11 the time Class Counsel spent preparing for and attending hearings in this matter. This billing
12 category also will include the time Class Counsel will spend preparing for and attending the final
13 approval hearing. In all, Class Counsel's attorneys and staff have spent 349.90 hours and
14 \$228,752.50 performing work in this billing category, but anticipate these amounts will increase
15 as Class Counsel has yet to complete the final approval papers and anticipates that the class
16 action approval process and work necessary to implement the settlement will increase the
17 lodestar by approximately \$30,000.00 based on the remaining work necessary to bring the case
18 to conclusion.

19 **L300 – Discovery**

20 This case involved extensive discovery, as set forth in greater detail in the Declaration of
21 Arthur Levy and the Points and Authorities. The Class Counsel's attorneys and staff spent
22 118.60 hours and \$76,912.50 performing work in this billing category.

23 **IV. CLASS COUNSEL'S EXPERIENCE**

24 **The Law Firm of Kemnitzer, Barron & Krieg**

25 16. Our law office has extensive experience in consumer class action litigation, including
26 having tried a class action to judgment. Our law office has been appointed as lead counsel in
27 over 250 class actions. Class Counsel has decades of experience in consumer issues, and has
28 specialized in class actions for most of their lengthy careers

17. Kemnitzer, Barron & Krieg's attorneys' hourly rates include many factors beyond personal compensation, including office staff, equipment, insurance, research materials, and other overhead expenses. The firm does not charge separately for secretarial time and other clerical costs, which are also included in the hourly rate. Consumer litigation inevitably involves large corporations, which have the capacity to bring enormous resources to bear that individual consumers are simply unable to meet on their own. The partners manage this law firm to meet those challenges. This involves, among other things IT costs, investigation and research costs that are much higher than those a more generalized small firm might employ. This overhead is also included in attorneys' hourly rate. This particular case could not have been brought and prosecuted, without this extensive support foundation included in overhead.

18. In contrast to the defense bar, in which attorneys compete for clients, there are not enough plaintiffs' attorneys specializing in consumer protection litigation to meet the need. Kemnitzer, Barron & Krieg takes fewer than 5% of the cases for clients who contact our office. The firm turns away some meritorious cases for lack of resources.

19. The firm spends a significant amount of time researching the merits of the case prior to filing a complaint, in order to ensure that we only file meritorious complaints. Therefore, a significant but necessary amount of time is spent conducting research on all factual and legal aspects of the case prior to filing.

20. Kemnitzer, Barron & Krieg, LLP is a boutique plaintiffs' firm. Currently, we have four partners, one of-counsel, and two paralegals.

21. The reported cases in which lawyers from our firm have been involved include the following:

- *Ibrahim v. Ford Motor Co.* (1989) 214 Cal.App.3d 878 (Song-Beverly Act)
- *Kwan v. Mercedes-Benz* (1994) 23 Cal.App.4th 174 (Song-Beverly Act)
- *Jensen v. BMW of North America* (1995) 36 Cal.App.4th 112 (Song-Beverly Act)
- *Music Acceptance v. Lofing* (1995) 32 Cal.App.4th 61 (Song-Beverly Act)
- *Bank of America v. Lallana* (1998) 19 Cal.4th 203 (Rees-Levering Act and Comm. Code)
- *Damian v. Tamondong* (1998) 65 Cal.App.4th 1115 (Rees-Levering Act)
- *Joseph v. J.J. MacIntyre* (2002) 238 F. Supp.2d 1158 (Fair Debt Collection)
- *Gutierrez v Autowest Dodge* (2003) 114 Cal.App.4th 77 (Consumer Arbitration)
- *Joseph v. J.J. MacIntyre* (2003) 281 F. Supp.2d 1156 (Fair Debt Collection)
- *Graham v. DaimlerChrysler* (2004) 34 Cal.4th 553 (Private Attorney General Fees)

- 1 • *Fireside Bank v. Superior Court* (2007) 40 Cal.4th 1069 (Rees-Levering Class Action)
- 2 • *Juarez v. Arcadia Financial Ltd.* (2007) 152 Cal.App.4th 889 (Rees-Levering)
- 3 • *Pintos v. Pacific Creditors Association* (9th Cir. 2009) 605 F.3d 665 (Fair Debt Collection)
- 4 • *Arguelles v. Americredit Financial Services* (2010) 184 Cal.App.4th 825 (Consumer Arbitration)
- 5 • *Medrazo v. Honda of North Hollywood* (2012) Cal.App.4th 1
- 6 • *Pierce v. Western Surety Company*, (2012) 207 Cal.App.4th 83
- 7 • *Wohlgemuth v. Caterpillar Inc.*, (2012) 207 Cal. App. 4th 1252 (CCP §998)
- 8 • *Mejia v. DACM, Inc.* (2020) 54 Cal. App. 5th 691.

9 22. Attached hereto as **Exhibit C**, is a list of some of the class action cases in which
10 Kemnitzer Barron & Krieg has served as class counsel, in most cases as lead counsel.

11 **V. COURTS ROUTINELY APPROVE OUR FIRMS' HOURLY RATES**

12 23. I request that \$950.00 per hour be used to calculate the lodestar for Mark Chavez's time,
13 \$850.00 per hour be used to calculate the lodestar for Bryan Kemnitzer's time, and \$650.00 per
14 hour to be used to calculate the lodestar for Adam McNeile's and my time. I am familiar with
15 hourly rates charged throughout California for non-contingent civil class action litigation of
16 comparable complexity. We know that our contemporaries bill at rates ranging over \$650.00 -
17 \$950.00 per hour. Thus, the hourly rates requested in this application are reasonable and
18 representative of the rates charged by comparable lawyers in fees-for-services cases. Our firm
19 took this case on a contingent fee basis, and our clients are not contractually obligated to pay for
20 any work unless there is a recovery. Thus, our firm assumed the clients' risk of loss.

21 24. On February 13, 2018, the Hon. William F. Highberger approved Bryan Kemnitzer's rate
22 of \$850 per hour in the case of *Ferrerias v. Too Fast, Inc.*, Los Angeles County Superior Court,
23 Case No. BC600720.

24 25. On October 4, 2018, the Hon. Edward Weil approved Bryan Kemnitzer's rate of \$850 per
25 hour in the case of *Rhoades v. Gateway One*, Contra Costa County Superior Court, Case No.
26 MSC16-00659.

27 26. On October 16, 2019, Hon. Thadd A. Blizzard approved Bryan Kemnitzer's rate at \$850
28 per hour in the case of *Shabestari v. Bank of the West et al.*, Sacramento County Superior Court,
Case No. 34-2017-00210831.

29 27. On December 12, 2019, Hon. Alan Perkins approved Bryan Kemnitzer's rate at \$850 per

1 hour in the case of *Campf v. The Golden 1 Credit Union*, Sacramento County Superior Court,
2 Case No. 34-2018-0228285.

3 28. On January 14, 2020, Hon. William Claster approved Bryan Kemnitzer's rate at \$850 per
4 hour in the case of *Melendez v. K Street Finance*, Orange County Superior Court Case No. 30-
5 2014-00722412.

6 29. On March 2, 2020, Hon. Barbara M. Scheper approved Bryan Kemnitzer's rate at \$850
7 per hour and my rate at \$650 per hour in the case of *Fielder v. Mechanics Bank*, Los Angeles
8 County Superior Court Case No. BC721391.

9 30. On November 18, 2020, Hon. Ethan P. Schulman Scheper approved Bryan Kemnitzer's
10 rate at \$850 per hour and my rate at \$650 per hour in the case of *Autovest v. Saundrea Mabrey*,
11 San Francisco County Superior Court Case No. CGC-18-566617.

12 31. On December 16, 2020, Hon. Ronda J. McKaig approved Bryan Kemnitzer's rate at \$850
13 per hour and my rate at \$650 per hour in the case of *Lawson v. Ventura County Credit Union*
14 Ventura County Superior Court Case No. 56-2018-00520827.

15 32. On January 19, 2021, Hon. Yvonne Palazuelos approved Bryan Kemnitzer's rate at \$850
16 per hour and my rate at \$650 per hour in the case of *Buckingham v. Automotive Funding Group*,
17 Los Angeles Superior Court Case No. BCC492394.

18 33. On May 21, 2021, Hon. Maren E. Nelson approved Bryan Kemnitzer's rate at \$850 per
19 hour and Adam McNeile's rate at \$650 per hour in the case of *Johnson v. Hyundai Capital,*
20 *America, Inc.*, Los Angeles Superior Court, Case No. BC565263.

21 34. On September 15, 2021, Hon. Bernard C. Barman, Jr. approved Adam McNeile and my
22 rate at \$650 per hour in the case of *Marrero v. Safe 1 Credit Union*, Kern County Superior Court
23 Case No. BCV-20-101457.

24 35. Our rates do not, however, reflect the contingency risk we assume, which hourly fee
25 lawyers in corporate practices do not face. Most attorneys are unwilling to represent consumers
26 due to the sizable risks involved and the disparities in resources available to the respective
27 parties. Invariably, the consumer is the underdog financially, and adverse parties generally have
28 huge financial resources. They retain attorneys on an hourly fee basis, instructing them to litigate

1 vigorously. For the defendants, these amounts of money are relatively small, so the risk is not a
2 concern. From the vantage point of the consumer, however, the risk is substantial and often
3 overwhelming.

4 **VI. QUALIFICATIONS OF ATTORNEYS AND STAFF**

5 **A. Kristin Kemnitzer**

6 36. I am a co-managing partner at Kemnitzer, Barron & Krieg. I earned my B.A. with honors
7 from Stanford University in 2006. I graduated from University of California, Berkeley, School of
8 Law in 2011. I passed the bar exam in November 2011 and was sworn in in December 2011.

9 37. In 2009, I served as a judicial extern for the Honorable Randall R. Rader, formerly Chief
10 Judge of the United State Court of Appeals for the Federal Circuit. During law school, I served
11 as Senior Articles Editor of the Berkeley Technology Law Journal. I also received a Certificate
12 of Law and Technology upon graduation.

13 38. From 2011 until 2012, I was a litigation associate at the law firm Wilson, Sonsini,
14 Goodrich & Rosati. While at Wilson Sonsini, I focused on Internet and copyright litigation, and
15 class action defense. I also handled a variety of *pro bono* matters, including negotiating public
16 performance rights for non-profit organizations, and an application for asylum.

17 39. I began working at Kemnitzer, Barron & Krieg in October 2012. I am responsible for all
18 aspects of litigation and firm management, including drafting briefs and other pleadings,
19 interviewing clients, managing cases, handling discovery, conducting legal research and analysis,
20 appearing in court and arbitration, mediating cases, and engaging in appellate advocacy. I have a
21 full case load involving both individual cases and class actions. During my tenure at the firm, I
22 have litigated over 200 cases, including dozens of class actions.

23 40. I am involved in a number of consumer organizations, including the National Consumer
24 Law Center, the National Association of Consumer Advocates, Public Citizen, Public Justice,
25 Consumer Attorneys of California, and the Marin County Bar Association.

26 41. I am frequently asked to speak on consumer law topics. A list of recent speaking
27 engagements is as follows:

- 28
- 2021 Speaker at National Consumer Law Center, Consumer Litigation Rights

- 1 Conference; New Developments in Auto Fraud
- 2 • 2021 Speaker at National Consumer Law Center, Consumer Litigation Rights
- 3 Conference; The ABCs of Used Car Cases
- 4 • PLI 26th Annual Consumer Financial Services Institute Conference; Arbitration, UDAP
- 5 and Class Action Update
- 6 • 2021 USC’s Gould School of Law Consumer Law Course Guest Lecture, The Rees-
- 7 Levering Act
- 8 • 2021 NACA Spring Training, Public Private Partnering on Auto Cases
- 9 • 2020 National Consumer Law Center, New Developments in Auto Fraud
- 10 • 2020 National Consumer Law Center, Settling Car Cases During the Pandemic
- 11 • 2020 University of California Berkeley School of Law, Student training on Running
- 12 Your Own Law Firm
- 13 • 2020 Public Counsel, MCLE training on the Rees-Levering Automobile Sales Finance
- 14 Act
- 15 • 2020 Housing and Economic Rights Advocates, MCLE training on the Rees-Levering
- 16 Automobile Sales Finance Act
- 17 • 2020 Practicing Law Institute, Helping Homeowners Facing Fair Lending Problems
- 18 • 2019 Host, National Consumer Law Center Women’s Reception
- 19 • 2019 National Consumer Law Center, Consumer Litigation Rights Conference, The
- 20 ABCs of Auto Fraud
- 21 • 2019 Public Law Center, MCLE training on the Rees-Levering Automobile Sales
- 22 Finance Act
- 23 • 2019 Bay Area Legal Aid, MCLE training on the Rees-Levering Automobile Sales
- 24 Finance Act
- 25 • 2018 Speaker at National Consumer Law Center, Consumer Litigation Rights
- 26 Conference, The ABCs of Used Car Cases
- 27 • 2017 Speaker at National Consumer Law Center, Consumer Litigation Rights
- 28 Conference, The ABCs of Used Car Cases
- 2017 Guest Lecturer at UC Hastings Law School Consumer Law Seminar
- 2015 CBS News ConsumerWatch Correspondent on the Song Beverly Consumer
- Warranty Act
- 2015 Bay Area Legal Aid MCLE Negotiation Training

42. I have also published articles on consumer law issues for Plaintiff Magazine and Law360.

43. Detailed descriptions of my tasks are included in the detailed time report. I am the timekeeper identified as “Kristin Kemnitzer.” My current billing rate is \$650 per hour.

21 **B. Adam McNeile**

22 44. Mr. McNeile is the co-managing partner at Kemnitzer Barron & Krieg.

23 45. In 2008, Adam McNeile graduated *cum laude* with a B.A. in Broadcast Journalism from
24 the University of Southern California. In 2011, Mr. McNeile graduated with a J.D. from
25 University of California, Berkeley, School of Law.

26 46. From December 2011 to January 2015, Mr. McNeile worked as an attorney specializing
27 in bankruptcy litigation for the law firm Sheppard, Mullin, Richter & Hampton, LLP in both the
28 Los Angeles and San Francisco offices. He was responsible, among other things, for motion

1 practice, client relations, and making court appearances in federal court. Mr. McNeile
2 represented numerous committees of unsecured creditors in multimillion-dollar bankruptcies
3 during this time.

4 47. Mr. McNeile has worked at Kemnitzer, Barron & Krieg since February 2015. His major
5 responsibilities include drafting briefs and other pleadings, interviewing clients, managing cases,
6 serving as a client liaison, preparing and responding to discovery, including taking and defending
7 depositions, garnering and analyzing evidence, appearing in court, and participating in
8 mediations and settlement conferences. During his time at this law firm, he has worked on
9 numerous complex consumer class actions as well as many individual cases.

10 48. Mr. McNeile has been an MCLE lecturer on various topics and has written articles,
11 including as follows:

- 12 • 2022 NACA Spring Training Co-Chair
- 13 • 2021 NACA Spring Training, Lifecycle of an Auto Fraud Case
- 14 • 2020 NCLC Consumer Rights Litigation Conference, Intro to Dealer Fraud
- 15 • 2020 NACA Spring Training, Dealer Add-Ons Litigation
- 16 • 2020 Berkeley Law Lecture, Running Your Own Law Firm
- 17 • Law360, April 21, 2020, “California Auto Defect Law Makes the Roads Safer for
18 Everyone”
- 19 • 2020 Housing and Economic Rights Advocates, MCLE training on the Rees-Levering
20 Automobile Sales Finance Act
- 21 • 2019 Public Law Center, MCLE training on the Rees-Levering Automobile Sales
22 Finance Act
- 23 • 2019 Bay Area Legal Aid, MCLE training on the Rees-Levering Automobile Sales
24 Finance Act
- 25 • 2018 NACA Auto Fraud Conference, Formal Discovery in Auto Fraud Cases
- 26 • 2017 Guest Lecturer at UC Hastings Law School Consumer Law Seminar
- 27 • 2015 Bay Area Legal Aid MCLE Negotiation Training

28 49. Mr. McNeile is actively involved in a number of organizations seeking to promote the
interests of consumers through public interest litigation. He is a member of the National
Association of Consumer Advocates and is actively involved with Public Citizen.

50. Detailed descriptions of his tasks are included in the detailed report attached hereto. He is
the timekeeper identified as “Adam McNeile.” Mr. McNeile’s hourly rate is \$650.00.

26 **C. Bryan Kemnitzer**

27 51. Mr. Kemnitzer graduated from Stanford University with a B.A. in 1972, and from the
28 University of the Pacific, McGeorge School of Law with a J.D. in 1975. He was admitted to the

1 California Bar in 1975. Mr. Kemnitzer is rated “AV” in Martindale-Hubbell. He has been a civil
2 litigator for nearly forty years. He has had further professional training as a civil trial lawyer through
3 NITA courses and many continuing education programs. Mr. Kemnitzer has tried numerous jury
4 cases to judgment and has served as an arbitrator and judge *pro tem*.

5 52. Mr. Kemnitzer is a founding member of the law firm Kemnitzer, Barron & Krieg, LLP,
6 which specializes in consumer litigation. His law practice is focused on representing consumers
7 who have disputes with manufacturers, auto dealers and financial institutions. In addition to
8 handling a large number of these types of cases at the pre-trial and trial level, the firm has also
9 done significant work in this area in the California appellate courts.

10 53. Throughout his career, Mr. Kemnitzer has been actively involved in a number of
11 organizations seeking to promote the interests of consumers through public interest litigation.
12 For several years, he was a member of the Board of Directors of the San Francisco Lawyer
13 Referral Service Association. He was a member of the Board of Governors of the Consumer
14 Attorneys of California (formerly California Trial Lawyers Association) for over five years,
15 starting in 1999.

16 54. Mr. Kemnitzer is a member of the National Association of Consumer Advocates, a non-
17 profit corporation formed in response to the belief that an organization of private and public
18 sector attorneys, legal services attorneys, law professors and students, whose primary practice or
19 interests involve the protection and representation of consumers, was needed. Its mission is to
20 promote justice for all consumers by maintaining a forum for information sharing among
21 consumer advocates across the country and to serve as a voice for its members as well as
22 consumers in the ongoing struggle to curb unfair and abusive business practices.

23 55. Mr. Kemnitzer has lectured on various aspects of consumer rights litigation at numerous
24 professional seminars, including the annual conferences for the National Consumer Law Center,
25 National Association of Consumer Advocates, the Consumer Attorneys of California, and the
26 Practicing Law Institute’s Consumer Financial Service Litigation Program. He was a speaker for the
27 Bridgeport Class Action Seminar in San Francisco regarding Arbitration and Class Actions and
28 spoke at another Bridgeport conference regarding taking effective depositions. He has testified on

1 these issues before various Sub-Committees of the California Assembly and Senate, and at the
2 Federal Trade Commission in Washington.

3 56. In 2008, Mr. Kemnitzer was invited to give an intensive training to JAG officers and
4 civilian legal services lawyers serving the Coast Guard.

5 57. Mr. Kemnitzer has been a guest lecturer at University of California Berkley School of
6 Law (Boalt Hall) on numerous occasions. Specifically, in 2011, he spoke at a class regarding
7 mediation and in 2014 spoke at an FTC conference held at the school, speaking on consumer
8 issues facing minorities and recent immigrants. In 2011, he talked with law students at the East
9 Bay Community Law Center regarding consumer protection law.

10 58. From 2002 to 2012, Mr. Kemnitzer was the chair of the National Consumer Law Center's
11 development arm, the Partner's Council. The National Consumer Law Center (NCLC), based in
12 Boston, is the nation's premiere provider of resources for consumer law. Not only does NCLC
13 have numerous publications to assist consumer advocates; it also has an annual convention,
14 participates in consumer class action litigation, and does in-depth investigation into consumer
15 issues.

16 59. Detailed descriptions of his tasks are included in the detailed time report. He is the
17 timekeeper identified as "Bryan Kemnitzer." His current billing rate is \$850 per hour.

18 **D. Mark Chavez**

19 60. Mr. Chavez has extensive experience representing consumers and other plaintiffs in class
20 actions and unfair business practices litigation.

21 61. Mr. Chavez received his B.A. *summa cum laude* from the University of the Americas in
22 1975 and his J.D. from Stanford Law School in 1979. In the fall of 1978, he served as a Judicial
23 Extern for the Honorable Mathew O. Tobriner, then Senior Associate Justice of the California
24 Supreme Court. After graduating from law school, Mr. Chavez joined the Civil Division of the
25 United States Department of Justice in Washington, D.C., through the Attorney General's
26 Honors Program. He was subsequently employed with the law firm of Pillsbury, Madison &
27 Sutro in San Francisco, California as an associate, and was a partner in the law firm of Farrow,
28 Bramson, Chavez & Baskin in Walnut Creek, California. For over 20 years, Mr. Chavez has

1 been a partner in the law firm of Chavez & Gertler LLP in Mill Valley, California handling class
2 action litigation on behalf of plaintiffs.

3 62. Mr. Chavez is a member in good standing of the California State Bar and the bars of
4 United States District Courts for the Northern, Eastern, Central and Southern Districts of
5 California. In connection with individual cases, he has been admitted to appear before the United
6 States District Courts for the District of Arizona, the District of Colorado, the District of
7 Columbia, the Middle District of Florida, the Southern District of Florida, the District of Idaho,
8 the Northern District of Illinois, the District of Massachusetts, the District of New Jersey, the
9 Eastern District of New York, the Eastern District of Pennsylvania and the Western District of
10 Washington. Mr. Chavez has also been admitted *pro hac vice* and has appeared before state trial
11 courts in Alabama, Arizona, Florida, Missouri, Nevada, Ohio, Washington, and West Virginia.

12 63. Mr. Chavez is admitted to practice before the United States Supreme Court and the
13 United States Court of Appeals for the Ninth Circuit, the District of Columbia Circuit and the
14 Eleventh Circuit. He has argued appeals before the United States Court of Appeals, the
15 California Supreme Court and the California Court of Appeals. The published appellate opinions
16 in his cases include the following:

- 17 • *In re Tobacco Cases II*, (2007) 41 Cal.4th 1257;
- 18 • *Olszewski v. Mr. Chavez v. Scripps Health*, (2003) 30 Cal.4th 798;
- 19 • *Washington Mutual Bank v. Superior Court*, (2001) 24 Cal.4th 906;
- 20 • *Linder v. Thrifty Oil Co.*, (2000) 23 Cal.4th 429 (argued as counsel for amicus);
- 21 • *AICCO, Inc. v. Insurance Co. of North America*, (2001) 90 Cal.App.4th 579 (argued as
22 counsel for amicus);
- *Norwest Mortgage, Inc. v. Superior Court*, (1999) 72 Cal.App.4th;
- *Rowland v. U.S. Dist. Court for Northern Dist. of California*, 849 F.2d 38015 9th Cir.
1988);
- *Toussaint v. McCarthy*, 801 F.2d 1080 (9th Cir. 1986); and
- *Gardiner v. Sea-Land Service, Inc.*, 786 F.2d 943 (9th Cir. 1986).

23 64. In the course of his career, Mr. Chavez has handled a number of other significant cases at
24 the trial court level, including the following:

- 25 • *Karahalios v. National Federal of Federal Employee, Local 1263*, 489 U.S. 527 (1989) -
26 action involving the scope of federal court jurisdiction over federal labor matters;
- 27 • *United States v. PATCO*, 524 F.Supp. 160 (D.D.C. 1981) - action to enjoin the air traffic
28 controllers from engaging in a nationwide strike; and,
- *United Presbyterian Church v. Reagan, et al.*, 738 F.2d 1375 (D.C. Cir. 1984) - action
challenging the constitutionality of President Reagan's Executive Order redefining the
scope of permissible intelligence activities by the CIA, NSA and FBI.

1 65. Throughout his career, Mr. Chavez has been actively involved in a number of
2 organizations seeking to promote the interests of consumers through public interest litigation.
3 Mr. Chavez was a founding member of the Stanford Public Interest Law Foundation in 1978 and
4 in 1993 was one of three original members named honorary members of its Board of Directors in
5 recognition of the extent and duration of our support for the organization. For several years, he
6 was a member of the Board of Directors of the San Francisco Trial Lawyers Association. He is
7 also a former member of the Board of Governors of the Consumer Attorneys of California
8 (formerly California Trial Lawyers Association), Disability Rights Advocates and the Public
9 Justice Foundation. In 1993, Mr. Chavez and seven other consumer attorneys from across the
10 country founded the National Association of Consumer Advocates. The National Association of
11 Consumer Advocates is a non-profit corporation formed in response to the belief that an
12 organization of private and public sector attorneys, legal services attorneys, law professors and
13 students, whose primary practice or interests involve the protection and representation of
14 consumers, was needed. Its mission is to promote justice for all consumers by maintaining a
15 forum for information-sharing among consumer advocates across the country and to serve as a
16 voice for its members as well as consumers in the ongoing struggle to curb unfair and abusive
17 business practices. It currently has approximately 1,600 members. Mr. Chavez has served as
18 Co-Chair of the National Association of Consumer Advocates and was a member of its Board of
19 Directors for eight years. In addition, he was a member of the Board of Directors of the National
20 Consumer Law Center for 10 years and currently serves on its Partners Council.

21 66. Mr. Chavez lectures frequently on various class action and consumer law issues. In
22 recent years, he has given presentations on class action matters at the American Bar
23 Association's Class Action Institute, the American Association for Justice's Class Action
24 Symposium, and the Practising Law Institute's Consumer Financial Services Litigation Program.
25 He has also spoken at the annual convention of the American Bar Association, the National
26 Consumer Rights Litigation Conference, the annual convention of the State Bar of California, the
27 annual convention of the Consumer Attorneys of California, the California Bankers Association
28 Conference, and the Banking Litigation Seminar of the Association of the Bar of the City of New

1 York. His most recent speaking engagements include the following:

- 2 • “Living on the Fault Line: Class Action Issues in California,” American Bar
- 3 Association’s Thirteenth Annual National Institute on Class Actions, San Francisco,
- 4 California, November 20, 2009
- 5 • “IPO, Hydrogen Peroxide, and the Evolving Standards of Proof for Class Certification,”
- 6 AAJ 2010 Annual Convention, Vancouver, Canada, July 13, 2010
- 7 • “Fighting Back Against The Big Business Agenda,” Consumer Rights Litigation
- 8 Conference, Chicago, Illinois, November 5, 2011
- 9 • “Federal Preemption: Endangered Species After Dodd-Frank and Clearing House,”
- 10 Financial Services Litigation in the Era of Dodd-Frank, Phoenix, Arizona, November 11,
- 11 2011
- 12 • “*Wal-Mart v. Dukes* – How Much of a Hazard to Class Certification in Financial Services
- 13 Cases?” American Bar Association Consumer Finance Subcommittee Winter Meeting,
- 14 Park City, Utah, January 9, 2012
- 15 • “The Impact of *Wal-Mart v. Dukes* on the Class Certification Calculus,” CAOC/SFTLA
- 16 Sixth Annual Class Action Seminar, San Francisco, California, February 28, 2012
- 17 • “The Implications of Downsizing Class Actions: Multi-District Litigation, Co-
- 18 Counseling, Coordination,” The Impact Fund’s Tenth Annual Class Action Conference,
- 19 Berkeley, California, March 2, 2012
- 20 • “The Future of Class Actions,” Bridgeport’s Twelfth Annual Class Action Conference,
- 21 Los Angeles, California, April 20, 2012.
- 22 • “Ethical Issues in Representing Multiple Plaintiffs,” California Employment Lawyers
- 23 Association 11th Annual Advanced Wage and Hour Seminar, Los Angeles, California,
- 24 April 17, 2015.
- 25 • “Strength In Numbers: Ethical Issues In Class And Mass Actions,” California State Bar
- 26 Committee on Professional Responsibility and Conduct, Twentieth Annual Statewide
- 27 Ethics Symposium, San Francisco, California, April 9, 2016.
- 28 • “Ethical Issues Relating to Class Representatives,” National Consumer Law Center Class
- Action Symposium, Anaheim, California, October 22, 2016.

67. Mr. Chavez is a former member of the Editorial Board of the Consumer Financial Services Law Report and previously served on the Editorial Board of Class Action Reports for over 10 years. He has also written and published a number of articles on class action and consumer law issues, including: “The George Court Issues Surprising Endorsement of Class Action Device in *Linder v. Thrifty Oil*,” FORUM, January/ February 2001, at 12 and “*Kraus, Cortez* and Future Battlegrounds In Representative Actions Under the Unfair Competition Law,” FORUM, July/August 2000, at 33 (co-authored with Alan M. Mansfield). Mr. Chavez also co-authored (with Kim Card) an article entitled “Recent Developments In California Law On Class Certification Issues,” for the Consumer Attorneys of California 35th Annual Tahoe Seminar Consumer Remedies Program, at which Mr. Chavez was a speaker, and an article entitled “California’s Unfair Competition Law – The Structure and Use of Business and Professions Code §17200,” for the Practicing Law Institute’s Consumer Financial Services Litigation 2008

1 Program. In addition, he prepared an article entitled “The MDL Process” for presentations
2 before the National Consumer Rights Litigation Conference and the Practicing Law Institute’s
3 Consumer Financial Services Litigation Program.

4 68. In the 36 years that Mr. Chavez has been practicing law, he has spent the vast majority of
5 his career litigating class action cases. Mr. Chavez has had extensive experience handling such
6 actions in both the federal and state courts. In April 2000, he successfully argued *Linder v.*
7 *Thrifty Oil*, (2000) 23 Cal.4th 429 before the California Supreme Court, on behalf of amicus the
8 Consumer Attorneys of California. *Linder* was the first decision on class certification issues
9 decided by the California Supreme Court in nearly two decades. Mr. Chavez was co-counsel for
10 the plaintiff class in *Washington Mutual Bank, F.A. v. Superior Court*, (2001) 24 Cal.4th 906, in
11 which the California Supreme Court defined the rules governing certification of nationwide
12 classes in California. In addition, he was lead counsel for the plaintiffs and argued before the
13 California Supreme Court in *Olszeweski v. Mr. Chavez v. Scripps Health*, (2003) 30 Cal.4th 798.
14 Mr. Chavez was also co-counsel for the plaintiff class in *In re Tobacco Cases II*, (2007) 41
15 Cal.4th 1257.

16 69. In the course of his career, Mr. Chavez has also served as lead or co-lead counsel in over
17 120 other class actions. He has extensive experience and expertise handling consumer class
18 actions in federal and state court. Although most class actions settle prior to trial, Mr. Chavez
19 was co-counsel for the plaintiff class in a two-month federal court class action trial at which 65
20 witnesses testified and over 1,000 exhibits were introduced. He was also lead counsel for the
21 plaintiff class in a successful class action trial in California state court.

22 70. Mr. Chavez has extensive experience and expertise in the field of consumer financial
23 services litigation. For six years, he was the Co-Chair of the Practicing Law Institute’s
24 Consumer Financial Services Litigation Program in New York and San Francisco. He has been
25 appointed lead or co-lead counsel for plaintiff classes in over 70 class actions filed against banks,
26 credit card companies, automobile finance lenders and credit unions. Mr. Chavez has
27 successfully prosecuted consumer financial services class actions in state and federal courts
28 around the country over the past 25 years including *Richardson v. Wells Fargo Auto Finance*_

1 *Inc.*, San Francisco Superior Court, Case No. CGC-08-481662 (\$232 million settlement achieved
 2 after the filing of motion of summary judgment), *Smith v. General Motors Acceptance*
 3 *Corporation*, Case No. 776152 (Santa Clara County Superior Court) (\$105 million settlement
 4 achieved after trial); and *In Re Transouth Cases*, (Santa Clara County Superior Court) (\$76
 5 million settlement).

6 71. Unlike many plaintiffs' attorneys, Mr. Chavez has had substantial experience
 7 representing defendants in large scale class actions. He defended such cases both while he was
 8 with the United States Department of Justice and while in private practice. For example, Mr.
 9 Chavez previously served as lead or co-counsel for the defendants in the following class actions:

- 10 • *Alexandra v. Alamo* (Alameda Sup. Ct. No. 640832-9) - statewide class action
 11 challenging the price of collision damage waivers sold by a car rental company.
- 12 • *Nosse, et al. v. Volkswagen of America, Inc.* (S.F. Sup. Ct. No. 780024) - statewide class
 13 action suit seeking damages allegedly resulting from a defective part in 1974-1979
 14 Volkswagen manufactured vehicles.
- 15 • *Bernice Turbeville v. William Casey and Central Intelligence Agency* (E.D. Va. Civil
 16 Action No. 81-1058-A) - nationwide class action alleging sex discrimination in
 17 promotion, training and overseas assignments of the CIA's female operations officers.

18 72. Mr. Chavez and his firm have received a number of honors and awards for their work.
 19 Mr. Chavez has been "AV" rated by Martindale-Hubbell for 20 years. In 1994, he was selected
 20 to deliver the opening address at the National Consumer Rights Litigation Conference in
 21 recognition of his work on behalf of consumers challenging force placed insurances charges by
 22 lenders around the country. His firm was named Law Firm of the Year by the Los Angeles
 23 Center for Law & Justice in 2001. Mr. Chavez has been selected as a Northern California Super
 24 Lawyer by Law & Politics and San Francisco Magazine on eight occasions. In 2006, he received
 25 the Champion of Justice Award from the Bar Association of San Francisco. His firm received
 26 the Equal Justice Award from the Law Foundation of Silicon Valley in 2007. In March 2012,
 27 Mr. Chavez received the Guardian of Justice Award from Bay Area Legal Aid. He received the
 28 Consumer Attorney of the Year Award from the National Association of Consumer Advocates in
 November 2013. Most recently, the National Consumer Law Center honored him with its 2016
 Vern Countryman Consumer Law Award as a public interest attorney "whose special
 contributions to the practice of consumer law have strengthened and affirmed the rights of low-

1 income Americans.”

2 73. Mr. Chavez currently serves as Chair of the Board of Directors of the Public Citizen
3 Foundation in Washington, D.C. In the course of his career, Mr. Chavez has represented a
4 number of other public interest organizations as amicus counsel in various state and federal
5 appellate courts.

6 74. Detailed descriptions of his tasks are included in the detailed time report. He is the
7 timekeeper identified as “Mark Chavez.” His current billing rate is \$950 per hour.

8 **E. Sean R. Barry**

9 75. Sean R. Barry is our firm’s senior paralegal. Mr. Barry graduated from the University of
10 Pennsylvania, earning a B.A. in Political Science in 1989, and earned his California State Bar
11 Paralegal Certificate in September 1994 from California State University – San Francisco.

12 76. Mr. Barry has more than 25 years of experience as a litigation paralegal, and has been
13 with Kemnitzer, Barron & Krieg since July 1998. While with the firm, Mr. Barry has
14 successfully testified at trial in support of his document review and analysis. Mr. Barry’s
15 responsibility as senior paralegal is the management of our firm’s active litigation cases for
16 counsel. As such, he is required to review each and every piece of correspondence, pleadings,
17 discovery, and case related materials delivered to our office by mail, fax, e-mail, or other means.
18 In this initial review, Mr. Barry identifies events and calculates deadlines which must be
19 calendared, enters the events into our electronic calendar, determines and recommends
20 responsive action to the attorneys, responds where appropriate, and forwards the documents to
21 the appropriate partners and/or associates. The entering of events into our electronic calendar
22 generally takes only a small fraction of this time, yet is vital to his management of the firm’s
23 active litigation, and is not merely a clerical task. Another small part of this initial review
24 includes scanning the documents into an electronic database, with concurrent data management
25 functions. It is also Mr. Barry’s responsibility to draft routine legal forms including, but not
26 limited to proofs of service, case management statements, declarations, briefs and/or notices. It is
27 his further responsibility to draft correspondence to courts, clients, opposing counsel, consultants
28 and co-counsel regarding pending litigation. Mr. Barry is also regularly called upon to draft and

1 edit written discovery requests and deposition notices to opposing parties, and to draft and edit
2 discovery responses to opposing parties.

3 77. Detailed descriptions of his tasks are included in the detailed time report. He is the
4 timekeeper identified as “Sean Barry.” Mr. Barry’s current hourly rate is \$275.00. His rate has
5 been approved by numerous courts in class action and individual cases.

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct to the best of my present recollection and this declaration is
8 executed December 9, 2021, in Mill Valley, California.

9
10 /s/ Kristin Kemnitzer
KRISTIN KEMNITZER

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EXHIBIT A

FILTERS USED :

Project In : Toland, Taquelia & Georgia

and **Time Cost Date In :** 1/1/1970 To 11/19/2021

and **Resource In :** Adam McNeile, Bryan Kemnitzer, C.C.P. 1033.5, Kristin Kemnitzer, Mark Chavez, Sean Barry

Employee	Hours/Unit	Rate	Amount
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Client ID: Toland, Taquelia & Georgia

Project ID - Name (Manager):Toland, Taquelia & Georgia - Toland, Taquelia & Georgia(Kristin Kemnitzer)

Services:

Adam McNeile

Adam McNeile Total: 7.20 \$650.00 \$4,680.00

Bryan Kemnitzer

Bryan Kemnitzer Total: 77.90 \$850.00 \$66,215.00

Kristin Kemnitzer

Kristin Kemnitzer Total: 491.40 \$650.00 \$319,410.00

Mark Chavez

Mark Chavez Total: 17.80 \$950.00 \$16,910.00

Sean Barry

Sean Barry Total: 117.70 \$274.51 \$32,310.00

Services Total: 712.00 \$439,525.00

Expenses:

C.C.P. 1033.5

C.C.P. 1033.5 Total: 37.00 \$17,762.34

Expenses Total: 37.00 \$17,762.34

Project Toland, Taquelia & Georgia Total: 749.00 \$457,287.34

EXHIBIT B

KB DETAILED REPORT

FILTERS USED :

Project In : Toland, Taquelia & Georgia
and Employee In : Adam McNeile, Bryan Kemnitzer, C.C.P. 1033.5, Kristin Kemnitzer, Mark Chavez, Sean Barry
and Time Entry Date In : 1/1/1970 To 11/19/2021

PROJECT(MANAGER) : Toland, Taquelia & Georgia (Kristin Kemnitzer)

DATE	EMPLOYEE	DESCRIPTION	HRS	RATE	AMOUNT
<i>L100: - Case Assessment and Development</i>					
1/12/2017	Kristin Kemnitzer	Toland: Conf with AL re potential case; conf with BK re same	0.20	\$650.00	\$130.00
2/9/2017	Kristin Kemnitzer	Toland: Prep for client meeting; travel to client meeting; conf with clients re potential class action; travel back from meeting	3.30	\$650.00	\$2,145.00
2/24/2017	Kristin Kemnitzer	Toland: conf with staff re file; conf with AL re complaint; conf with clients re same; draft complaint; review file for facts	1.50	\$650.00	\$975.00
2/24/2017	Sean Barry	(Toland) email from associate re complaint; researched notice of related cases; email to associate re notice of related cases, complex designation	0.30	\$250.00	\$75.00
3/6/2017	Kristin Kemnitzer	Toland:Emails with clients and co counsel re credit reports	0.30	\$650.00	\$195.00
3/13/2017	Sean Barry	email from associate re complaint; email to associate re complaint	0.10	\$250.00	\$25.00
3/22/2017	Sean Barry	conference initiated by associate re complaint	0.10	\$250.00	\$25.00
3/23/2017	Sean Barry	email from associate re complaint; researched entities; email to associate re venue; conference initiated by associate re venue; email to One Legal re complaint	0.30	\$250.00	\$75.00
3/24/2017	Sean Barry	email from associate re complaint; email to associate re complaint	0.10	\$250.00	\$25.00
4/3/2017	Sean Barry	Researched complaint; emails (4) from One Legal re Complaint; reviewed Summons, CCCS, Compliant; Notice of Related Case, ADR Info; document management ; researched assignment, Case Management Conference ; reviewed Notice of Hearing; email to process server re service; email to co-counsel re pleadings	0.80	\$275.00	\$220.00
4/4/2017	Sean Barry	Initial case processing	0.90	\$275.00	\$247.50
4/17/2017	Kristin Kemnitzer	Review new debt collection letters; conf with clients re same; conf with co counsel re same	0.30	\$650.00	\$195.00
4/19/2017	Sean Barry	emails (2) from associate re service; researched service for associate; email to associate, co-counsel re chill, appearance not due for another 2 weeks	0.20	\$275.00	\$55.00
5/1/2017	Kristin Kemnitzer	Call from AL re case status; conf with BK re case status; review file for response date; call opposing counsel	0.50	\$650.00	\$325.00
5/4/2017	Sean Barry	email from process server re service	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

5/4/2017	Kristin Kemnitzer	Review emails re extension and complex; conf with BK re case status; call opposing counsel	0.50	\$650.00	\$325.00
5/5/2017	Sean Barry	email from Court re case activity; reviewed Order; researched Notice of Removal not received; researched service; document management form process server re service; reviewed Proof of Service ; document management ; email to One Legal re Proof of Service	0.40	\$275.00	\$110.00
5/8/2017	Sean Barry	email from associate re removal; reviewed USDC Order; created M&C calendar for Bryan Kemnitzer , associate ; emails (2) from Court re case activity; reviewed Notices of Appearances; document management	0.50	\$275.00	\$137.50
5/9/2017	Sean Barry	Researched complex designation; reviewed Notice of Removal; updated Proof of Service , database re appearances	0.30	\$275.00	\$82.50
5/10/2017	Sean Barry	email from associate re magistrate; email to associate re magistrate	0.10	\$275.00	\$27.50
5/15/2017	Sean Barry	Researched complex determination; reviewed tentative ruling ; document management ; email to Bryan Kemnitzer , associate , co-counsel re tentative ruling ; email from Court re case activity; reviewed stipulation	0.50	\$275.00	\$137.50
5/16/2017	Sean Barry	emails (4) from One Legal re Proof of Service ; document management ; emails (2) from associate re magistrate	0.20	\$275.00	\$55.00
5/17/2017	Sean Barry	email from Court re case activity; reviewed defendants' declination of magistrate; document management ; email from associate re declination	0.20	\$275.00	\$55.00
5/30/2017	Sean Barry	Researched remand motion	0.10	\$275.00	\$27.50
6/1/2017	Sean Barry	Reviewed Order; document management ; researched hearings	0.20	\$275.00	\$55.00
6/2/2017	Sean Barry	emails (5) from Court re case activity; reviewed Notice of Impending Reassignment, Order Reassigning Case, stipulation for Extension, Reassignment Order Setting Case Management Conference , Motion for Remand; document management	0.70	\$275.00	\$192.50
6/9/2017	Sean Barry	Researched Case Management Conference Statement; emails (2) from Court re case activity; released clerk's notice, answer; document management	0.40	\$275.00	\$110.00
6/16/2017	Sean Barry	Researched Case Management Conference Statement, hearings; emails (2) to Bryan Kemnitzer , associate , co-counsel re Case Management Conference Statement; emails (3) from associate re Case Management Conference ; email from co-counsel re hearing; email to Court re Case Management Conference ; email from Court re Case Management Conference	0.80	\$275.00	\$220.00

GROUPED BY Activity Item

KB DETAILED REPORT

6/20/2017	Sean Barry	emails (4) from Court re case activity; reviewed motion to continue opposition, stipulation , notice of appearance, opposition; document management ; conference initiated by associate re reply	0.70	\$275.00	\$192.50
6/21/2017	Sean Barry	email from associate re reply; email to email re reply; email from Court re case activity; reviewed docket correction; document management ; conference initiated by co-counsel re hearing	0.30	\$275.00	\$82.50
6/23/2017	Sean Barry	emails (4) from associate re reply; email from Court re case activity; reviewed Order re extension; emails (2) from co-counsel re extension, reply; emails (2) to associate re extension, reply	0.50	\$275.00	\$137.50
6/27/2017	Sean Barry	Researched reply; email form Court re case activity; reviewed reply; document management	0.20	\$275.00	\$55.00
7/13/2017	Sean Barry	emails (2) from co-counsel re ADR certification, M&C; emails (3) from associate re ADR certification, M&C; emails (2) to Court re ADR Certifications; emails (3) from Court re case activity; document management ; email to co-counsel re ADR	0.40	\$275.00	\$110.00
7/24/2017	Sean Barry	conference initiated by SJ re document production	0.10	\$275.00	\$27.50
7/26/2017	Sean Barry	emails (3) from associate re disclosures, Case Management Conference Statement; email from co-counsel re disclosures; email to associate re disclosures; email from Court re case activity; reviewed stipulation ; document management ; email to co-counsel , associate re Case Management Conference Statement	0.40	\$275.00	\$110.00
7/27/2017	Sean Barry	emails (5) from associate re Protective Order , Case Management Conference Statement; emails (4) from opposing counsel re Protective Order , Case Management Conference Statement; emails (3) to associate re Protective Order , Case Management Conference Statement; emails (3) to Court re Protective Order , Case Management Conference Statement; emails (3) from Court re case activity; reviewed Certificate of Interested Entities, Proposed Protective Order , Case Management Conference Statement; document management ; drafted letter to Court re Protective Order , Case Management Conference Statement	0.60	\$275.00	\$165.00
8/2/2017	Sean Barry	email from Court re case activity; reviewed Clerk's Notice; document management ; email to co-counsel re hearing	0.20	\$275.00	\$55.00
8/3/2017	Sean Barry	email from co-counsel re hearing	0.10	\$275.00	\$27.50
8/4/2017	Sean Barry	email from Court re case activity; reviewed Minute Order; document management	0.20	\$275.00	\$55.00

GROUPED BY Activity Item

KB DETAILED REPORT

8/11/2017	Sean Barry	Reviewed defendants' initial disclosures; document management	0.20	\$275.00	\$55.00
8/24/2017	Sean Barry	Researched supplemental statements; emails (3) from associate re extensions; emails (2) from opposing counsel re extensions	0.40	\$275.00	\$110.00
8/30/2017	Sean Barry	emails (4) from Court re case activity; reviewed stipulation , Order; document management	0.30	\$275.00	\$82.50
9/5/2017	Sean Barry	email from Court re case activity; reviewed opposition to remand; document management	0.20	\$275.00	\$55.00
9/12/2017	Sean Barry	Researched OSC; email to associate re response to OSC; email from associate re response to OSC; email to One Legal re response to OSC	0.20	\$275.00	\$55.00
9/14/2017	Sean Barry	email from associate re supplemental reply; email to associate re supplemental reply	0.10	\$275.00	\$27.50
9/18/2017	Sean Barry	Researched OSC; emails (4) from One Legal re response to OSC; reviewed tentative Case Management Conference Order; document management ; email to associate , co-counsel re OSC; emails (3) from associate re expert; emails (6) from expert re declaration; emails (4) from associate re supplemental reply; emails (3) from co-counsel re supplemental reply; prepared expert declaration, exhibits; email to Court re supplemental reply; drafted letter to Court re supplemental reply	1.30	\$275.00	\$357.50
9/21/2017	Sean Barry	Researched supplemental reply	0.10	\$275.00	\$27.50
9/28/2017	Sean Barry	Researched and reviewed Case Management Conference Order; email to One Legal re Notice of Order	0.30	\$275.00	\$82.50
11/8/2017	Sean Barry	Researched Case Management Conference Order, Statement; email from associate re Statement; emails (3) to associate re declaration; emails (2) from associate re declaration; email from co-counsel re declaration	0.20	\$275.00	\$55.00
11/14/2017	Sean Barry	Researched Case Management Conference Statement; email to One Legal re Declaration	0.10	\$275.00	\$27.50
11/20/2017	Sean Barry	Researched OSC; emails (4) from One Legal re response to OSC; researched Notice of Order; emails (4) from One Legal re Notice of Order; document management ; email to One Legal re Notice of Order	0.70	\$275.00	\$192.50
2/12/2018	Sean Barry	Researched Notice of Order; emails (5) from One Legal re Notice of Order; document management	0.20	\$275.00	\$55.00
2/13/2018	Kristin Kemnitzer	email to co counsel re status	0.10	\$650.00	\$65.00
3/13/2018	Sean Barry	email from opposing counsel re Case Management Conference ; email from co-counsel re Case Management Conference	0.10	\$275.00	\$27.50
3/14/2018	Sean Barry	email from co-counsel re Case Management Conference Statement	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

3/26/2018	Sean Barry	Researched OSC; email from co-counsel re Case Management Conference Statement; document management ; researched and reviewed tentative Case Management Conference Order; email from co-counsel re tentative order	0.70	\$275.00	\$192.50
4/10/2018	Sean Barry	Researched and reviewed Case Management Conference Orders; document management ; email to One Legal re Notice of Order	0.30	\$275.00	\$82.50
4/27/2018	Sean Barry	Researched Notice of Order; emails (4) from One Legal re Notice of Order; document management	0.20	\$275.00	\$55.00
5/11/2018	Sean Barry	Researched Case Management Conference Statement	0.10	\$275.00	\$27.50
5/21/2018	Sean Barry	Researched Case Management Conference Statement, remand motion; email from co-counsel re Case Management Conference Statement	0.20	\$275.00	\$55.00
5/22/2018	Sean Barry	email from co-counsel re Case Management Conference Statement; document management	0.10	\$275.00	\$27.50
5/29/2018	Sean Barry	Researched OSC; reviewed tentative Case Management Conference Order; document management ; email from co-counsel re Case Management Conference Order; email to counsel re Case Management Conference Order	0.30	\$275.00	\$82.50
7/17/2018	Sean Barry	email from Court re case activity; reviewed Order re remand; document management ; emails (2) from associate re document productions; email from TB re document productions; researched document productions; email to associate re document production	0.70	\$275.00	\$192.50
7/18/2018	Sean Barry	emails (4) from associate re document productions; emails (3) from opposing counsel re document productions	0.20	\$275.00	\$55.00
8/8/2018	Sean Barry	conference initiated by Bryan Kemnitzer re document production	0.10	\$275.00	\$27.50
8/13/2018	Sean Barry	Researched document productions; email form opposing counsel re document production; reviewed correspondence re document production; reviewed defendants' document production; document management	0.40	\$275.00	\$110.00
8/17/2018	Sean Barry	Reviewed Request for Production of Documents to defendants, interrogatories to Nationstar; document management	0.50	\$275.00	\$137.50
9/10/2018	Kristin Kemnitzer	emails re extension	0.30	\$650.00	\$195.00
9/11/2018	Kristin Kemnitzer	Read new case law re CAFA; review Nationstar's initial disclosures	1.10	\$650.00	\$715.00
9/12/2018	Kristin Kemnitzer	Review initial disclosures; memo re same; email to co counsel re findings	2.00	\$650.00	\$1,300.00
9/13/2018	Kristin Kemnitzer	review file; conf with co counsel	0.20	\$650.00	\$130.00

GROUPED BY Activity Item

KB DETAILED REPORT

10/4/2018	Sean Barry	Researched discovery; emails (2) from opposing counsel re extensions; emails (3) from associate re extensions; email from Court re case activity; reviewed Order; researched Case Management Conference ; document management	0.50	\$275.00	\$137.50
10/8/2018	Sean Barry	emails (10) from associate re Joint Statement, discovery; researched Orders; email to associate re Joint Statement; emails (6) from co-counsel re discovery, Joint Statement; email from Court re case activity; reviewed Certificate of Interested Entities; document management	0.70	\$275.00	\$192.50
10/10/2018	Sean Barry	Researched Joint Statement; email from opposing counsel re extensions; emails (2) from opposing counsel re Joint Statement; emails (3) form associate re Joint Statement; email from co-counsel re Joint Statement; email to Court re Joint Statement; email from Court re case activity; document management	0.40	\$275.00	\$110.00
10/11/2018	Sean Barry	Drafted letter to Court re joint statement	0.10	\$275.00	\$27.50
10/17/2018	Sean Barry	Researched hearing, document production; email from associate re hearing; email from opposing counsel re document production; reviewed document production; document management	0.50	\$275.00	\$137.50
10/23/2018	Sean Barry	email from Court re case activity; reviewed Minute Order; document management	0.20	\$275.00	\$55.00
10/25/2018	Kristin Kemnitzer	research new Rule 23 rules	1.00	\$650.00	\$650.00
10/26/2018	Sean Barry	email from Court re case activity; reviewed Clerk's Notice; document management	0.20	\$275.00	\$55.00
10/29/2018	Sean Barry	Researched discovery responses; email from Court re Pre-Settlement conference	0.20	\$275.00	\$55.00
11/12/2018	Sean Barry	email from associate re discovery responses	0.10	\$275.00	\$27.50
11/15/2018	Sean Barry	Researched conference call	0.10	\$275.00	\$27.50
11/19/2018	Sean Barry	Reviewed defendants' discovery responses; document management	0.40	\$275.00	\$110.00
12/5/2018	Sean Barry	Reviewed Nationstar's discovery requests; document management	0.40	\$275.00	\$110.00
12/19/2018	Sean Barry	Researched discovery responses; email form opposing counsel re extensions; email from Court re case activity; reviewed Minute Order; document management ; email from associate re extensions; email from opposing counsel re extensions	0.40	\$275.00	\$110.00
1/9/2019	Sean Barry	emails (2) from Court re case activity; reviewed Scheduling Order, Order Setting MSC; researched and reviewed Standing Orders; document management ; prepared discovery, trial schedule for Bryan Kemnitzer , associate	1.80	\$275.00	\$495.00

GROUPED BY Activity Item

KB DETAILED REPORT

1/15/2019	Sean Barry	Researched discovery responses; emails (9) from associate re discovery, M&C, trial; emails (3) from client re discovery; emails (2) from opposing counsel re M&C, extension; researched and prepared case schedule for associate ; email to associate re case schedule	0.90	\$275.00	\$247.50
1/18/2019	Sean Barry	email from associate re discovery	0.10	\$275.00	\$27.50
1/22/2019	Sean Barry	emails (2) from associate re discovery responses; email to associate re discovery responses; document management	0.30	\$275.00	\$82.50
2/25/2019	Sean Barry	email to Bryan Kemnitzer , associate re discovery responses	0.10	\$275.00	\$27.50
3/10/2019	Sean Barry	Reviewed supplemental discovery responses; document management	0.30	\$275.00	\$82.50
3/15/2019	Sean Barry	Researched document productions; email from Court re case activity; reviewed discovery dispute letter, Order; document management	0.40	\$275.00	\$110.00
4/1/2019	Sean Barry	Researched telephonic appearance; telephone call to CourtCall re hearing; drafted Proof of Service	0.20	\$275.00	\$55.00
4/8/2019	Sean Barry	Researched hearing	0.10	\$275.00	\$27.50
4/16/2019	Sean Barry	emails (2) from Court re case activity; reviewed Substitution of Counsel, Minute Order; document management ; updated Proof of Service , database re substitution; email to associate re M&C	0.40	\$275.00	\$110.00
5/13/2019	Sean Barry	email from Court re case activity; reviewed discovery letter brief; document management	0.30	\$275.00	\$82.50
6/7/2019	Sean Barry	emails (3) from Court re case activity; reviewed Orders, Notice of Appearance; document management	0.40	\$275.00	\$110.00
6/18/2019	Sean Barry	Researched Case Management Conference Statement; emails (2) from Court re case activity; reviewed discovery agreement, exhibits, Clerk's Notice; researched and reviewed Alameda County Case Management Conference Orders; document management ; email to associate , co-counsel re Case Management Conference Statement	0.50	\$275.00	\$137.50
6/25/2019	Sean Barry	email from associate re Case Management Conference Statement; email from opposing counsel re Case Management Conference Statement; email to One Legal re Case Management Conference Statement; researched depositions ; email to co-counsel re depositions	0.30	\$275.00	\$82.50

GROUPED BY Activity Item

KB DETAILED REPORT

7/1/2019	Sean Barry	Researched Case Management Conference Statement, hearing, tentative ruling ; email from opposing counsel re depositions ; emails (3) from co-counsel re depositions ; reviewed deposition notice; email to associate , co-counsel re depositions ; emails (3) from One Legal re Case Management Conference Statement; reviewed Tentative Case Management Conference Order; document management ; email to associate re Case Management Conference Order	0.70	\$275.00	\$192.50
7/3/2019	Sean Barry	Researched and reviewed Case Management Conference Order; email to One Legal re Notice of Entry of Dismissal	0.20	\$275.00	\$55.00
7/9/2019	Sean Barry	Reviewed Nationstar deposition notices; researched service; email to opposing counsel re service; document management ; email from co-counsel re depositions	0.50	\$275.00	\$137.50
7/18/2019	Sean Barry	Researched deposition ; email from associate re supplemental discovery responses; reviewed supplemental responses; researched Notice of Entry of Dismissal; emails (\$) from One Legal re Notice of Entry of Dismissal; document management ; emails (3) from co-counsel re M&C; emails (3) from opposing counsel re M&C	0.50	\$275.00	\$137.50
7/19/2019	Sean Barry	Researched depositions ; email from opposing counsel re M^C	0.20	\$275.00	\$55.00
7/31/2019	Sean Barry	Researched discovery; email from co-counsel re discovery; reviewed additional discovery to defendants; document management	0.40	\$275.00	\$110.00
8/2/2019	Sean Barry	Reviewed supplemental discovery responses; document management	0.40	\$275.00	\$110.00
8/16/2019	Sean Barry	email from assistant re document production	0.10	\$275.00	\$27.50
9/5/2019	Sean Barry	Researched expert disclosure	0.10	\$275.00	\$27.50
9/11/2019	Sean Barry	Reviewed defendants' discovery responses; emails (2) from Court re case activity; reviewed stipulation and proposed order, discovery letter brief; document management ; email from associate re Orders; email to associate re Orders	0.60	\$275.00	\$165.00
9/18/2019	Sean Barry	email from Court re case activity; reviewed Notice of Appearance; document management	0.10	\$275.00	\$27.50
9/19/2019	Sean Barry	Reviewed Defendants' expert disclosure; document management	0.20	\$275.00	\$55.00
9/27/2019	Sean Barry	email from associate re depositions	0.10	\$275.00	\$27.50
9/30/2019	Sean Barry	email from opposing counsel re deposition	0.10	\$275.00	\$27.50
10/1/2019	Sean Barry	email from associate re rebuttal report	0.10	\$275.00	\$27.50
10/3/2019	Sean Barry	emails (4) from associate re expert report, disclosure; researched disclosures; emails (2) to associate re expert report, disclosures	0.40	\$275.00	\$110.00

GROUPED BY Activity Item

KB DETAILED REPORT

10/4/2019	Sean Barry	emails (9) from co-counsel re client documents , supplemental responses, expert reports, depositions ; email from client re client documents ; emails (4) from associate re supplemental responses, expert reports, depositions ; emails (3) from opposing counsel re depositions ; email from expert re rebuttal report; reviewed supplemental responses, document production; document management ; email to associate , co-counsel re expert disclosure	0.90	\$275.00	\$247.50
10/9/2019	Sean Barry	email from associate re subpoena	0.10	\$275.00	\$27.50
10/14/2019	Sean Barry	emails (4) from co-counsel re depositions , demand, mediation; email from associate re demand; emails (3) to co-counsel , associate re depositions , mediation; reviewed Defendants' deposition notice, subpoena; reviewed correspondence re demand; emails (3) from opposing counsel re depositions , demand; researched mediation; reviewed correspondence re mediation; document management ; conference w/ assistant re mediation brief	0.90	\$275.00	\$247.50
10/15/2019	Sean Barry	email from associate re class certification; researched class certification; email to associate re no hearing; email from co-counsel re deposition objections; email from associate re subpoena objections; email from associate re supplemental discovery responses; reviewed supplemental responses; document management	0.40	\$275.00	\$110.00
10/16/2019	Sean Barry	Researched deposition objections	0.10	\$275.00	\$27.50
10/17/2019	Sean Barry	emails (3) from associate re expert deposition ; email from co-counsel re expert deposition	0.20	\$275.00	\$55.00
10/21/2019	Sean Barry	Researched subpoena objections; emails (2) from associate re objections; opposing counsel from co-counsel re objections; emails (2) to associate re objections	0.20	\$275.00	\$55.00
10/22/2019	Sean Barry	email from associate re subpoena objections; email to opposing counsel re objections; opposing counsel from opposing counsel re mediation brief; reviewed mediation briefs; document management	0.20	\$275.00	\$55.00
10/24/2019	Sean Barry	email from associate re deposition	0.10	\$275.00	\$27.50
10/25/2019	Sean Barry	email from associate re transcript	0.10	\$275.00	\$27.50
11/6/2019	Bryan Kemnitzer	preparing for court hearing re discovery and schedule discussing case with EK & KK read pleadings and issues re class	1.50	\$850.00	\$1,275.00
11/6/2019	Sean Barry	Researched hearings; email from associate re deposition notes	0.20	\$275.00	\$55.00
11/7/2019	Bryan Kemnitzer	preparing or hearing review documents and case discussing case with AL	1.00	\$850.00	\$850.00

GROUPED BY Activity Item

KB DETAILED REPORT

11/8/2019	Sean Barry	email from associate re hearing	0.10	\$275.00	\$27.50
11/13/2019	Sean Barry	Researched motions, hearings; email from Court re case activity; reviewed Minute Order; document management ; email from associate re expert deposition	0.30	\$275.00	\$82.50
11/14/2019	Sean Barry	Researched Scheduling Order	0.10	\$275.00	\$27.50
11/25/2019	Sean Barry	email from ADR Services re correspondence	0.10	\$275.00	\$27.50
11/26/2019	Sean Barry	email from Court re case activity; reviewed Scheduling Order; document management	0.30	\$275.00	\$82.50
12/10/2019	Sean Barry	email from Bryan Kemnitzer re representation	0.10	\$275.00	\$27.50
12/16/2019	Sean Barry	email from co-counsel re objections	0.10	\$275.00	\$27.50
12/16/2019	Sean Barry	emails (2) from co-counsel re USDC admission; email from associate re USDC admission; researched USDC admission; email to associate , co-counsel re USDC admission; email from Bryan Kemnitzer re "call me"; email to USDC re Bryan Kemnitzer admission; email from USDC re Bryan Kemnitzer admission; drafted application for admission; submitted application online; email to Bryan Kemnitzer re application	0.90	\$275.00	\$247.50
12/17/2019	Sean Barry	email from associate re expert deposition ; emails (4) from opposing counsel re deposition , M&C; emails (3) from co-counsel re deposition , M&C; reviewed deposition notice; reviewed defendants' supplemental document production; emails (2) from Court re case activity; reviewed Notice of Pendancy of Other Action, Order re settlement conference ; document management ; email to Court re settlement conference	0.90	\$275.00	\$247.50
12/17/2019	Sean Barry	email from associate re settlement objection	0.10	\$275.00	\$27.50
12/18/2019	Sean Barry	email from Bryan Kemnitzer re USDC admission; researched admission; email to Bryan Kemnitzer re admission	0.20	\$275.00	\$55.00
12/19/2019	Sean Barry	Researched hearings, Order; reviewed Order; updated settlement conference schedule; document management	0.30	\$275.00	\$82.50
12/20/2019	Sean Barry	reviewed correspondence re case issues	0.10	\$275.00	\$27.50
12/20/2019	Sean Barry	email to opposing counsel re document productions	0.10	\$275.00	\$27.50
12/20/2019	Sean Barry	Researched settlement conference	0.10	\$275.00	\$27.50
12/30/2019	Sean Barry	Researched hearings	0.10	\$275.00	\$27.50
12/31/2019	Sean Barry	Researched MSC	0.10	\$275.00	\$27.50
1/3/2020	Sean Barry	Researched Orders, hearings	0.20	\$275.00	\$55.00
1/6/2020	Sean Barry	telephone call from Kristin Kemnitzer re class cert	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

1/8/2020	Sean Barry	email from Court re case activity; reviewed correspondence re Order; document management	0.20	\$275.00	\$55.00
1/9/2020	Sean Barry	Researched hearing, conference call; email from Court re case activity; reviewed Clerk's Notice; document management	0.30	\$275.00	\$82.50
1/10/2020	Sean Barry	Researched McCoy objections, deadlines; opposing counsel from Kristin Kemnitzer re Notice of Appearance; email to Court re Notice of Appearance; associate from Court re case activity; document management	0.60	\$275.00	\$165.00
1/13/2020	Sean Barry	Researched hearinbgs; emails (2) from Kristin Kemnitzer re class cert; email from Court (McCoy) re case activity; reviewed McCoy fee motion points and authorities , declaration exhibits; document management ; emails (3) from co-counsel re class cert	0.40	\$275.00	\$110.00
1/14/2020	Sean Barry	Researched class cert motion; email from Kristin Kemnitzer re Protective Order ; researched, downloaded and reviewed Protective Order ; email to Kristin Kemnitzer re Protective Order ; emails (3) from co-counsel re hearing date, class cert	0.50	\$275.00	\$137.50
1/15/2020	Sean Barry	email from Kristin Kemnitzer re McCoy	0.10	\$275.00	\$27.50
1/16/2020	Sean Barry	email from opposing counsel re class cert; email from Court re case activity; reviewed class cert motion; email to Court re Notice of Change of Address; em from Court re case activity; document management	0.40	\$275.00	\$110.00
1/21/2020	Sean Barry	email from co-counsel re class cert briefing; email to co-counsel re class cert briefing	0.10	\$275.00	\$27.50
1/22/2020	Adam McNeile	Review emails re issues with McCoy; strategize re same.	0.20	\$650.00	\$130.00
1/23/2020	Sean Barry	email from Kristin Kemnitzer re McCoy opposition; reviewed correspondence re Toland/McCoy overlap; email from Court re case activity; reviewed Set/Reset Deadlines; document management	0.40	\$275.00	\$110.00
1/24/2020	Sean Barry	email from Kristin Kemnitzer re McCoy opposition; email to Kristin Kemnitzer , Adam McNeile re tables; email from Adam McNeile re tables; email to Court re opposition; drafted letter to Court re opposition	0.30	\$275.00	\$82.50
1/27/2020	Sean Barry	Researched conference call	0.10	\$275.00	\$27.50
1/28/2020	Sean Barry	emails (2) from Court re case activity; reviewed Minute Entry, Notice of MSC; document management ; email from Kristin Kemnitzer re MSC	0.40	\$275.00	\$110.00
1/31/2020	Sean Barry	Researched McCoy reply	0.10	\$275.00	\$27.50
2/4/2020	Sean Barry	email from Kristin Kemnitzer re McCoy reply	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

2/6/2020	Sean Barry	email from Court re McCoy case activity; reviewed reply, response to objections; document management	0.30	\$275.00	\$82.50
2/10/2020	Sean Barry	Drafted letter to opposing counsel re e-service; email to opposing counsel re e-service	0.20	\$275.00	\$55.00
2/12/2020	Sean Barry	Researched class cert opposition; email from Court re case activity; reviewed opposition brief, declarations, exhibits; document management	0.40	\$275.00	\$110.00
2/13/2020	Sean Barry	(McCoy) email from associate re USDC-SD admission; researched Kristin Kemnitzer admission; administration to Court re admission; emails (2) to Kristin Kemnitzer re admission; emails (3) from Court re admission	0.40	\$275.00	\$110.00
2/24/2020	Sean Barry	telephone call from Adam McNeile re reply brief	0.10	\$275.00	\$27.50
2/25/2020	Sean Barry	Researched class cert reply; email to co-counsel re class cert reply	0.10	\$275.00	\$27.50
2/26/2020	Sean Barry	email from co-counsel re class cert reply	0.10	\$275.00	\$27.50
3/3/2020	Sean Barry	Researched e-service stipulation ; email from co-counsel re e-service stipulation ; email to opposing counsel re e-service stipulation	0.20	\$275.00	\$55.00
3/5/2020	Sean Barry	Researched e-service stipulation	0.10	\$275.00	\$27.50
3/6/2020	Sean Barry	email from Kristin Kemnitzer re class cert reply; researched class cert reply; email from Court re case activity; reviewed class cert reply, declaration; document management ; email to Kristin Kemnitzer re class cert reply	0.40	\$275.00	\$110.00
3/9/2020	Sean Barry	reviewed correspondence re McCoy; email from Court re case activity (McCoy); reviewed Minute Entry (McCoy); document management ; emails (2) from Kristin Kemnitzer re transcript (McCoy); telephone call (voicemail) to Court reporter re transcript (McCoy); email to Kristin Kemnitzer re transcript (McCoy)	0.30	\$275.00	\$82.50
3/11/2020	Sean Barry	Researched transcript (McCoy); email from Court re case activity; reviewed HERA Notice of Change of Address; document management	0.20	\$275.00	\$55.00
3/16/2020	Sean Barry	email from Court re hearing	0.10	\$275.00	\$27.50
3/17/2020	Sean Barry	email from Kristin Kemnitzer re hearing	0.10	\$275.00	\$27.50
3/18/2020	Sean Barry	email from Court re case activity; reviewed Order; document management ; emails (2) from Kristin Kemnitzer re hearing; emails (4) from co-counsel re hearing	0.20	\$275.00	\$55.00
3/18/2020	Sean Barry	email from Kristin Kemnitzer re continuances	0.10	\$275.00	\$27.50
3/20/2020	Sean Barry	email from Kristin Kemnitzer re hearings	0.10	\$275.00	\$27.50
3/31/2020	Sean Barry	email from Court re case activity; reviewed Order re settlement dates; document management	0.30	\$275.00	\$82.50

GROUPED BY Activity Item

KB DETAILED REPORT

4/5/2020	Sean Barry	email from Kristin Kemnitzer re McCoy Order; reviewed McCoy Order; document management ; email from co-counsel re McCoy Order	0.40	\$275.00	\$110.00
4/10/2020	Sean Barry	(McCoy) Researched case tatus; (McCoy) emails (2) from Court re case activity; (McCoy) reviewed Order re in camera submission, Order Granting Conditional Final Approval; document management ; (McCoy) email from Kristin Kemnitzer re Order; email from opposing counsel re e-service stipulation ; email to Court re e-service stipulation ; email from Court re stipulation ; updated Proof of Service re stipulation	0.60	\$275.00	\$165.00
4/17/2020	Sean Barry	Researched case status; emails (8) from co-counsel re revised McCoy SAR, Order, Status Report, NOtice; emails (5) from Kristin Kemnitzer re revised McCoy SAR, Order, Status Report, Notice; emails (5) from opposing counsel re continuances, stipulation ; emails (8) from co-counsel re continuances, stipulation ; emails (3) from Kristin Kemnitzer re continuances; emails (2) from Court re McCoy case activity; reviewed McCoy Status Report and response; emails (4) from Court re case activity; reviewed stipulation re modifying Schedule, Order re Class Cert Hearing, correspondence re MSC, Order re MSC; document management	1.20	\$275.00	\$330.00
4/21/2020	Sean Barry	emails (3) from Kristin Kemnitzer re McCoy pleadings; researched McCoy pleadings; emails (3) to Kristin Kemnitzer re McCoy pleadings previously saved	0.20	\$275.00	\$55.00
4/26/2020	Sean Barry	(McCoy) email from Court re case activity; reviewed Order re settlement conference ; document management	0.20	\$275.00	\$55.00
4/26/2020	Sean Barry	emails (2) from Court re case activity; reviewed motion to exclude testimony, MSJ, declarations; document management	0.80	\$275.00	\$220.00
4/27/2020	Sean Barry	telephone call from Kristin Kemnitzer re motion oppositions	0.10	\$275.00	\$27.50
4/30/2020	Sean Barry	Researched McCoy joint report	0.10	\$275.00	\$27.50
5/4/2020	Sean Barry	Researched motions; emails (2) from Bryan Kemnitzer re correspondence , settlement position; reviewed correspondence re case issues; email from opposing counsel re settlement position; emails (3) from Court re case activity; reviewed stipulation re motions, Scheduling Order, Notice of Withdrawal of Motions; document management ; emails (2) from Kristin Kemnitzer re motions; emails (4) from co-counsel re motions	0.90	\$275.00	\$247.50
5/7/2020	Sean Barry	(McCoy) emails (2) from Court re case activity; reviewed Orders re telephonic conference ; document management	0.20	\$275.00	\$55.00

GROUPED BY Activity Item

KB DETAILED REPORT

5/7/2020	Sean Barry	emails (7) from Kristin Kemnitzer re MSC, issues, demand, motions; emails (4) from co-counsel re MSC, issues, demand, motions; email from client re MSC; emails (3) from Court re case activity; reviewed stipulation and proposed order re motions Minute Entry re MSC, Notice of Rescheduled MSC; document management	0.60	\$275.00	\$165.00
5/11/2020	Sean Barry	telephone call from Kristin Kemnitzer re stipulation	0.10	\$275.00	\$27.50
5/12/2020	Sean Barry	emails (2) from Kristin Kemnitzer re MSC; email from opposing counsel re MSC; email from client re MSC; email from co-counsel re MSC	0.20	\$275.00	\$55.00
5/13/2020	Sean Barry	email from Kristin Kemnitzer re stipulation ; email to Kristin Kemnitzer re stipulation	0.10	\$275.00	\$27.50
5/14/2020	Sean Barry	Drafted Proposed Stipulated Order re MSC	0.30	\$275.00	\$82.50
5/14/2020	Sean Barry	email to Kristin Kemnitzer re Proposed Stipulated Order	0.10	\$275.00	\$27.50
5/21/2020	Sean Barry	emails (2) from Kristin Kemnitzer re stipulation re MSC; email from co-counsel re stipulation re MSC; emails (3) from Court re case activity; reviewed MSJ, motion to strike testimony, Order re briefing schedule; document management	0.60	\$275.00	\$165.00
5/21/2020	Sean Barry	(McCoy) email from Court re case activity; reviewed Minute Entry ; document management	0.20	\$275.00	\$55.00
5/24/2020	Sean Barry	email from Kristin Kemnitzer re Proposed Stipulated Order	0.10	\$275.00	\$27.50
5/27/2020	Sean Barry	email from opposing counsel re Proposed Stipulated Order; email from Kristin Kemnitzer re Proposed Stipulated Order; prepared Proposed Stipulated Order; email to Court re Proposed Stipulated Order; email from Court re case activity; document management ; email to chambers re Proposed Stipulated Order	0.40	\$275.00	\$110.00
5/28/2020	Sean Barry	Prepared chambers copy; drafted letter to Court re Proposed Order	0.20	\$275.00	\$55.00
5/31/2020	Sean Barry	email from Kristin Kemnitzer re settlement matrix	0.10	\$275.00	\$27.50
6/3/2020	Sean Barry	email from Kristin Kemnitzer re settlement matrix	0.10	\$275.00	\$27.50
6/4/2020	Sean Barry	email from Court re case activity; reviewed Order re MSC; document management	0.20	\$275.00	\$55.00
6/8/2020	Sean Barry	Researched motions oppositions; telephone call from Kristin Kemnitzer re motions oppositions, MSC	0.20	\$275.00	\$55.00
6/10/2020	Sean Barry	emails (2) from Court re case activity; reviewed oppositions to motion to exclude testimony and MSJ, declarations; document management	0.30	\$275.00	\$82.50
6/17/2020	Sean Barry	email from Kristin Kemnitzer re MSC	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

6/18/2020	Sean Barry	email from Kristin Kemnitzer re administrative motions; reviewed motion, exhibit; document management	0.20	\$275.00	\$55.00
6/22/2020	Sean Barry	email from Court re case activity; reviewed administrative motion, declaration; document management	0.20	\$275.00	\$55.00
6/24/2020	Sean Barry	(McCoy) emails (2) from Court re case activity; reviewed Orders; document management	0.20	\$275.00	\$55.00
6/24/2020	Sean Barry	email from Kristin Kemnitzer re settlement matrix; email from co-counsel re settlement matrix	0.10	\$275.00	\$27.50
6/29/2020	Sean Barry	email from Court re case activity; reviewed Order re MSC; document management	0.20	\$275.00	\$55.00
7/2/2020	Sean Barry	email from Kristin Kemnitzer re MSC; email from Court re case activity; reviewed defendants' response, declaration, proposed order re motion to file under seal; document management	0.40	\$275.00	\$110.00
7/5/2020	Sean Barry	emails (3) from co-counsel re settlement matrix; emails (2) from Kristin Kemnitzer re settlement matrix, MSC	0.20	\$275.00	\$55.00
7/8/2020	Sean Barry	email from client re MSC; email from Kristin Kemnitzer re MSC	0.10	\$275.00	\$27.50
7/13/2020	Sean Barry	telephone call from Kristin Kemnitzer re settlement matrix; email from Court re case activity; reviewed reply briefs; document management ; emails (7) from Kristin Kemnitzer re settlement matrix, MSC, M&C; emails (4) from co-counsel re settlement matrix, MSC, M&C; email from opposing counsel re M&C; researched settlement matrix; email to Court re settlement matrix	0.70	\$275.00	\$192.50
7/15/2020	Sean Barry	emails (2) from Kristin Kemnitzer re MSC Statement, exhibits; researched MSC Order re exhibits; email to Kristin Kemnitzer re exhibits; emails (2) to Court re exhibits; email from Court re exhibits	0.50	\$275.00	\$137.50
7/16/2020	Sean Barry	email to Adam McNeile , Kristin Kemnitzer re MSC statements	0.10	\$275.00	\$27.50
7/17/2020	Sean Barry	email from Court re MSC Statements; emails (5) from Kristin Kemnitzer re MSC Statements; emails (3) from co-counsel re MSC Statements; drafted letter to Court re MSC Statements; email to Court re MSC Statements; email to opposing counsel re service	0.50	\$275.00	\$137.50
7/23/2020	Sean Barry	email from Kristin Kemnitzer re MSC Statement; reviewed Defendants' MSC Statement; document management	0.20	\$275.00	\$55.00
7/28/2020	Sean Barry	emails (4) from client re MSC; emails (3) from Kristin Kemnitzer re MSC; emails (4) from co-counsel re MSC	0.20	\$275.00	\$55.00
7/30/2020	Sean Barry	emails (3) from Kristin Kemnitzer re email ; emails (2) to Kristin Kemnitzer re email ; email to co-counsel re email	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

7/31/2020	Sean Barry	emails (10) from Kristin Kemnitzer re next steps, stipulation, fees, conference call, lodestar; emails (13) from co-counsel re next steps, fees, conference call, lodestar, stipulation ; emails (4) from Court re stipulation , case activity, extension; reviewed Minute Entry; document management ; email from Bryan Kemnitzer re fees; email from opposing counsel re stipulation ; compiled lodestars; drafted Kristin Kemnitzer letter re fees; email to Kristin Kemnitzer re fee letter; email to Court re stipulation ; email to chambers re Proposed Order; document management	1.10	\$275.00	\$302.50
8/3/2020	Sean Barry	telephone call from Kristin Kemnitzer re fee demand	0.10	\$275.00	\$27.50
8/5/2020	Sean Barry	emails (2) from Kristin Kemnitzer re fee demand; email to Kristin Kemnitzer re fee demand; edited fee demand; email to opposing counsel , Court re fee demand	0.20	\$275.00	\$55.00
8/7/2020	Sean Barry	email from Court re case activity; reviewed Order Staying Case; document management	0.20	\$275.00	\$55.00
8/14/2020	Sean Barry	email from Kristin Kemnitzer re stay; email from co-counsel re stay	0.10	\$275.00	\$27.50
8/14/2020	Sean Barry	(McCoy) email from Court re case activity; reviewed Order; document management	0.10	\$275.00	\$27.50
8/17/2020	Sean Barry	email from Kristin Kemnitzer re status report; email to Kristin Kemnitzer re status report	0.10	\$275.00	\$27.50
8/20/2020	Sean Barry	email from client re McCoy	0.10	\$275.00	\$27.50
8/21/2020	Sean Barry	emails (5) from opposing counsel re settlement proposal, joint statement; emails (13) from Kristin Kemnitzer re settlement matrix, joint statement; emails (6) from co-counsel re settlement matrix, joint statement; assembled joint statement; email to Court re Joint Statement	0.90	\$275.00	\$247.50
9/3/2020	Sean Barry	email from co-counsel re McCou; emails (2) from Court re case activity; reviewed Notice of Withdrawal (Lyons), Minute Entry; document management ; email from Kristin Kemnitzer re mediator's [sic] proposal; email from Court re settlement	0.40	\$275.00	\$110.00
9/7/2020	Sean Barry	email from Court re case activity; reviewed Minute Entry re settlement ; document management	0.10	\$275.00	\$27.50
9/7/2020	Sean Barry	(McCoy) email from Court re case activity; reviewed Minute Entry; document management	0.10	\$275.00	\$27.50
9/11/2020	Sean Barry	email from Court re case activity; reviewed Notice of Withdrawal; document management	0.10	\$275.00	\$27.50
9/17/2020	Sean Barry	emails (2) from Kristin Kemnitzer re SAR, settlement administration proposals	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

9/19/2020	Sean Barry	email from opposing counsel re settlement administration proposal; email from co-counsel re settlement administration proposal	0.10	\$275.00	\$27.50
9/22/2020	Sean Barry	email from Kristin Kemnitzer re class administration	0.10	\$275.00	\$27.50
9/25/2020	Sean Barry	email from opposing counsel re SAR	0.10	\$275.00	\$27.50
9/30/2020	Sean Barry	emails (2) from Kristin Kemnitzer re administration proposal, SAR; emails (4) from opposing counsel re administration proposal; email from co-counsel re administration proposal	0.20	\$275.00	\$55.00
10/2/2020	Sean Barry	em from Kristin Kemnitzer re administration proposal	0.10	\$275.00	\$27.50
10/8/2020	Sean Barry	email from Kristin Kemnitzer re administration estimate	0.10	\$275.00	\$27.50
10/17/2020	Sean Barry	email from JMD re administration proposal	0.10	\$275.00	\$27.50
10/28/2020	Sean Barry	email from KCC re administration proposal	0.10	\$275.00	\$27.50
10/29/2020	Sean Barry	email from JND re administration proposal	0.10	\$275.00	\$27.50
10/29/2020	Sean Barry	(McCoy) email from Court re case activity; reviewed Final Order and Judgment; document management	0.20	\$275.00	\$55.00
11/8/2020	Sean Barry	email from opposing counsel re SAR	0.10	\$275.00	\$27.50
11/8/2020	Sean Barry	(McCoy) email from Court re case activity; reviewed Order; document management	0.10	\$275.00	\$27.50
11/12/2020	Sean Barry	(McCoy) email (3) from Court re case activity; reviewed briefs re enforcement of settlement, fees, Order re hearing; document management	0.20	\$275.00	\$55.00
11/12/2020	Sean Barry	email from Rust re administration proposal; email from Heffler re administration proposal; email (3) from Kristin Kemnitzer re administration proposals, SAR	0.20	\$275.00	\$55.00
11/19/2020	Sean Barry	email from Kristin Kemnitzer re SAR; email from opposing counsel re SAR	0.10	\$275.00	\$27.50
11/20/2020	Sean Barry	email from Kristin Kemnitzer re class notice, claim form	0.10	\$275.00	\$27.50
11/30/2020	Sean Barry	email (2) from Kristin Kemnitzer re SAT; email from opposing counsel re SAR	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

12/1/2020	Sean Barry	email from opposing counsel re SAR	0.10	\$275.00	\$27.50
12/9/2020	Sean Barry	email from opposing counsel re SAR; email from Kristin Kemnitzer re SAR	0.10	\$275.00	\$27.50
12/11/2020	Sean Barry	email from opposing counsel re SAR; email (2) from Kristin Kemnitzer re SAR	0.10	\$275.00	\$27.50
12/15/2020	Sean Barry	email (4) from Kristin Kemnitzer re SAR; email (3) from opposing counsel re SAR; email from co-counsel re SAR; compiled final SAR and exhibits; document management	0.40	\$275.00	\$110.00
12/17/2020	Sean Barry	Researched SAR	0.10	\$275.00	\$27.50
12/18/2020	Sean Barry	Researched SAR	0.10	\$275.00	\$27.50
1/4/2021	Sean Barry	Telephone call from Kristin Kemnitzer re preliminary approval, SAR	0.10	\$275.00	\$27.50
1/6/2021	Sean Barry	email (2) from Kristin Kemnitzer re SAR, Standing orders; email from client re SAR; document management ; researched preliminary approval motion, hearing procedure; reviewed Standing Orders; email to Kristin Kemnitzer re SAR, Standing Orders; email to Court re Standing Orders	0.90	\$275.00	\$247.50
1/8/2021	Sean Barry	email from Kristin Kemnitzer re motion; researched administrative closure; email to Kristin Kemnitzer re motion	0.20	\$275.00	\$55.00
1/11/2021	Sean Barry	Telephone call from Kristin Kemnitzer re administration motions, stipulations; email (2) from Kristin Kemnitzer re motions, stipulations, proposed orders, declaration; email to co-counsel re stipulation; email (2) from co-counsel re stipulations, administrative motions; researched administrative motions; email (2) to Kristin Kemnitzer re motions, stipulations, proposed orders, declaration	0.60	\$275.00	\$165.00
1/12/2021	Sean Barry	email (2) from opposing counsel re SAR; email (4) from Kristin Kemnitzer re SAR, declaration; compiled fully-executed SAR; document management; email from client re declarations; email from co-counsel re administrative motions	0.40	\$275.00	\$110.00

GROUPED BY Activity Item

KB DETAILED REPORT

1/15/2021	Sean Barry	email (3) from co-counsel re projected claims, declaration; email (4) from Kristin Kemnitzer re projected claims, declaration, class administration; email from class administrator re administration; email from client re declarations	0.30	\$275.00	\$82.50
1/21/2021	Sean Barry	email fro Court re case activity; reviewed Order re page limits; document management; email from class administrator re class notice; email (4) from Kristin Kemnitzer re class notice, administrative motion, declarations; email from opposing counsel re administrative motions, domain; email from client re declaration; prepared client declarations	0.60	\$275.00	\$165.00
1/22/2021	Sean Barry	email (2) from class administrator re class notice; email (2) from Kristin Kemnitzer re class notice	0.10	\$275.00	\$27.50
1/25/2021	Sean Barry	Telephone call from Adam McNeile re preliminary approval	0.10	\$275.00	\$27.50
1/26/2021	Sean Barry	email from Kristin Kemnitzer re preliminary approval; email to Kristin Kemnitzer re preliminary approval; researched declarations	0.40	\$275.00	\$110.00
1/27/2021	Sean Barry	email from opposing counsel re motions; email to opposing counsel re administrative motion; email from opposing counsel re administration motion; email (3) from Kristin Kemnitzer re motions; email (2) to Kristin Kemnitzer re motions; email to co-counsel re motions; email from co-counsel re motions; email (3) to Court re administrative motion, declaration, proposed order; email from Court re administrative motion; document management	0.60	\$275.00	\$165.00
1/28/2021	Sean Barry	email (2) from class administrator re domain; email from opposing counsel re domain; email from Kristin Kemnitzer re domain; email from Court re case activity; reviewed administrative motion, declaration; document management; email to Kristin Kemnitzer re declaration; email to co-counsel re declaration; email from Kristin Kemnitzer re declaration; email from co-counsel re declaration; researched SAR re filing/notice requirements	1.60	\$275.00	\$440.00

GROUPED BY Activity Item

KB DETAILED REPORT

1/28/2021	Sean Barry	Reviewed and edited Kemnitzer declaration; researched and marked exhibits; reviewed and edited co-counsel declaration, points & authorities, notice of motion, tables of contents and authorities	2.60	\$275.00	\$715.00
1/29/2021	Sean Barry	email (2) from Kristin Kemnitzer re motions; email to Kristin Kemnitzer re motions	0.10	\$275.00	\$27.50
2/1/2021	Sean Barry	Telephone call from Kristin Kemnitzer re motions	0.10	\$275.00	\$27.50
2/2/2021	Sean Barry	Researched administrative motion; prepared chambers copies of motion; drafted letter to Court re motion; telephone call to Kristin Kemnitzer re administrative motion	0.30	\$275.00	\$82.50
2/3/2021	Sean Barry	email from Kristin Kemnitzer re Complaint; researched operative Complaint; email to class administrator re complaint	0.20	\$275.00	\$55.00
2/5/2021	Sean Barry	email (2) from Court re case activity; reviewed Orders re hearing; document management; email to Kristin Kemnitzer, co-counsel re motion; email from co-counsel re motion ; email from Kristin Kemnitzer re motion; compiled motion; email to Court re motions	0.30	\$275.00	\$82.50
2/8/2021	Sean Barry	email from Court re case activity; reviewed motion, declarations, exhibits, proposed order; document management; prepared chambers copies; drafted letter to Court re chambers copies	0.50	\$275.00	\$137.50
2/9/2021	Sean Barry	email from class administrator re website	0.10	\$275.00	\$27.50
2/10/2021	Sean Barry	email from co-counsel re website; email from class administrator re website	0.10	\$275.00	\$27.50
2/11/2021	Sean Barry	email from class administrator re website	0.10	\$275.00	\$27.50
2/18/2021	Sean Barry	email from class administrator re website; researched preliminary approval	0.10	\$275.00	\$27.50
2/22/2021	Sean Barry	email from Adam McNeile re Notice; reviewed CAFA Notice; document management	0.10	\$275.00	\$27.50
2/23/2021	Sean Barry	email (2) from co-counsel re website; email from class administrator re website	0.10	\$275.00	\$27.50
3/3/2021	Sean Barry	email from class administrator re website; email from co-counsel re website	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

3/9/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
3/10/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
3/12/2021	Sean Barry	Researched opposition to preliminary approval	0.10	\$275.00	\$27.50
3/16/2021	Sean Barry	Researched opposition to preliminary approval	0.10	\$275.00	\$27.50
3/17/2021	Sean Barry	Researched opposition to preliminary approval	0.10	\$275.00	\$27.50
3/23/2021	Sean Barry	Researched opposition, reply briefs, remote appearances; email to Kristin Kemnitzer, co-counsel re reply brief	0.20	\$275.00	\$55.00
3/25/2021	Sean Barry	email from Kristin Kemnitzer re no reply brief	0.10	\$275.00	\$27.50
3/30/2021	Sean Barry	email from Kristin Kemnitzer re hearing	0.10	\$275.00	\$27.50
4/5/2021	Sean Barry	email from co-counsel re hearing	0.10	\$275.00	\$27.50
4/7/2021	Sean Barry	email from Kristin Kemnitzer re hearing	0.10	\$275.00	\$27.50
4/13/2021	Sean Barry	email from Court re case activity; reviewed Order re hearing; document management; email from Kristin Kemnitzer re hearing; emails (2) to Court re Notice of Appearance, hearing	0.30	\$275.00	\$82.50
4/14/2021	Sean Barry	email from Court re case activity; reviewed Notice of Appearance; document management; researched hearing; email to Adam McNeile, Kristin Kemnitzer re hearing	0.20	\$275.00	\$55.00
4/15/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
4/16/2021	Sean Barry	email from Court re case activity; reviewed Minute Entry; document management	0.20	\$275.00	\$55.00
4/20/2021	Sean Barry	Researched revised class notice	0.10	\$275.00	\$27.50
4/21/2021	Sean Barry	Researched preliminary approval; email to Adam McNeile, Kristin Kemnitzer re supplemental filing required	0.20	\$275.00	\$55.00
4/26/2021	Sean Barry	email from Adam McNeile re supplemental pleadings	0.10	\$275.00	\$27.50
4/28/2021	Sean Barry	email from Kristin Kemnitzer re revised class notice	0.10	\$275.00	\$27.50
4/30/2021	Sean Barry	email from Kristin Kemnitzer re amended claim form, joint statement	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

5/18/2021	Sean Barry	Document Management	0.10	\$275.00	\$27.50
5/19/2021	Sean Barry	Document management	0.10	\$275.00	\$27.50
8/12/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re jurisdiction	0.10	\$275.00	\$27.50
8/13/2021	Sean Barry	Reviewed emails (3) from co-counsel re jurisdiction; reviewed emails (3) from Kristin Kemnitzer re jurisdiction	0.10	\$275.00	\$27.50
8/17/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re jurisdiction; reviewed email from co-counsel re jurisdiction	0.10	\$275.00	\$27.50
8/18/2021	Sean Barry	Reviewed email from co-counsel re jurisdiction	0.10	\$275.00	\$27.50
8/19/2021	Sean Barry	Reviewed email from co-counsel re jurisdiction; reviewed email from Kristin Kemnitzer re jurisdiction	0.10	\$275.00	\$27.50
8/20/2021	Sean Barry	Reviewed email from co-counsel re jurisdiction; reviewed email from Kristin Kemnitzer re jurisdiction	0.10	\$275.00	\$27.50
8/24/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re jurisdiction	0.10	\$275.00	\$27.50
10/20/2021	Sean Barry	Document management	0.10	\$275.00	\$27.50
10/27/2021	Sean Barry	Document management	0.10	\$275.00	\$27.50
10/29/2021	Sean Barry	Document management; prepared preliminary/final approval schedule for attorneys	0.50	\$275.00	\$137.50
L100: TOTAL:			97.70		\$32,595.00

L160: - Settlement/Non-Binding ADR

11/15/2018	Kristin Kemnitzer	Prep for call with ADR judge; attend call on ADR	0.50	\$650.00	\$325.00
9/11/2019	Kristin Kemnitzer	draft memo re scenarios for meditation; conf re same, analyze pros and cons	1.30	\$650.00	\$845.00
9/12/2019	Kristin Kemnitzer	conf re mediation	0.80	\$650.00	\$520.00
9/18/2019	Kristin Kemnitzer	Prepare demand; memo re settlement possibilities	0.60	\$650.00	\$390.00
9/19/2019	Kristin Kemnitzer	Review data and depositions; review prior case involving 580b; draft class action matrix	2.70	\$650.00	\$1,755.00
9/27/2019	Kristin Kemnitzer	conf re demand/class action matrix; review matrix; email re depositions and report; research case law re CCCRAA	1.70	\$650.00	\$1,105.00

GROUPED BY Activity Item

KB DETAILED REPORT

10/3/2019	Kristin Kemnitzer	Review and edit matrix, read herrera re class notice, review past settlements for info; conf re matrix and settlement	3.40	\$650.00	\$2,210.00
10/4/2019	Kristin Kemnitzer	Review matrix; conf with counsel re data; review data memo; finalize matrix; draft cover letter for matrix	1.00	\$650.00	\$650.00
10/7/2019	Bryan Kemnitzer	discussing case with Kristin re mediation and class cert motion review facts of case and issues call to AL re case	1.50	\$850.00	\$1,275.00
10/8/2019	Kristin Kemnitzer	Review docs re data for settlement; conf re mediation; review response to settlement matrix; conf with counsel re strategy call;	2.10	\$650.00	\$1,365.00
10/8/2019	Bryan Kemnitzer	preparing for mediation discussing case with Kristin and with AL review facts of case documents and call re mediation	2.00	\$850.00	\$1,700.00
10/9/2019	Kristin Kemnitzer	Conf with BK re mediation brief	1.50	\$650.00	\$975.00
10/14/2019	Kristin Kemnitzer	Prepare mediation brief	1.50	\$650.00	\$975.00
10/15/2019	Kristin Kemnitzer	Draft mediation brief	6.30	\$650.00	\$4,095.00
10/16/2019	Kristin Kemnitzer	edit mediation brief; conf with co counsel re brief and strategy; review edits; conf re edits to brief	2.00	\$650.00	\$1,300.00
10/17/2019	Bryan Kemnitzer	preparing for mediation discussing case with Kristin and Natallie and memo re mediation and settlement issues	1.50	\$850.00	\$1,275.00
10/17/2019	Kristin Kemnitzer	Conf re mediation strategy; conf re mediation brief; emails re brief	1.10	\$650.00	\$715.00
10/18/2019	Kristin Kemnitzer	Finalize mediation brief	3.40	\$650.00	\$2,210.00
10/18/2019	Bryan Kemnitzer	preparing for mediation review final mediation brief and exhibits and issues re recovery and class	1.00	\$850.00	\$850.00
10/21/2019	Kristin Kemnitzer	Prep for mediation; conf with atty re same	0.50	\$650.00	\$325.00
10/23/2019	Bryan Kemnitzer	preparing for mediation discussing case with Kristin review class numbers and issues re class	0.80	\$850.00	\$680.00
10/25/2019	Bryan Kemnitzer	attend mediation at ADR in SF discussing case with mediator and Kristin	9.00	\$850.00	\$7,650.00
10/25/2019	Kristin Kemnitzer	Prep for mediation; attend mediation; debrief mediation	10.20	\$650.00	\$6,630.00
10/31/2019	Bryan Kemnitzer	discussing case with atty for Nationstar re issues re mediation and demand and credit reporting	0.50	\$850.00	\$425.00
11/4/2019	Bryan Kemnitzer	call to AL re issues in case review Nationstar offer discussing with KK	0.30	\$850.00	\$255.00
11/4/2019	Kristin Kemnitzer	emails re settlement	0.30	\$650.00	\$195.00
11/5/2019	Bryan Kemnitzer	discussing case with KK and AL re counter demand and issues re hearing	0.30	\$850.00	\$255.00
11/6/2019	Kristin Kemnitzer	Conf re settlement	0.30	\$650.00	\$195.00
11/10/2019	Bryan Kemnitzer	prepare counter demand re Nationstar and issues re injunction and class wide relief	1.00	\$850.00	\$850.00

GROUPED BY Activity Item

KB DETAILED REPORT

11/11/2019	Bryan Kemnitzer	discussing status of case with KK and with AL re email to Judge Hernandez and counter demand	0.30	\$850.00	\$255.00
11/13/2019	Bryan Kemnitzer	review case re class settlement in fed court and issues re rule 23 and prelim and final approval	0.80	\$850.00	\$680.00
11/14/2019	Bryan Kemnitzer	discussing case with Judge Hernandez re Nationstar and offer and plaintiffs demand and issues in case re settlement	0.50	\$850.00	\$425.00
11/16/2019	Bryan Kemnitzer	review draft email to judge Hernandez discussing issues with KK memo re change	0.40	\$850.00	\$340.00
11/20/2019	Bryan Kemnitzer	discussing case with AL and with Judge Hernandez review draft email to Judge re demand and offer	0.50	\$850.00	\$425.00
11/21/2019	Bryan Kemnitzer	call from Judge Hernandez re demand and offer review changes to demand email	0.40	\$850.00	\$340.00
11/25/2019	Bryan Kemnitzer	email from Judge Hernandez and review court order re schedule and call to atty	0.30	\$850.00	\$255.00
11/27/2019	Bryan Kemnitzer	email from Judge Hernandez re status of case and issues re settlement call to AL	0.30	\$850.00	\$255.00
4/17/2020	Kristin Kemnitzer	conf re settlement strategy; review judge Ryu order	0.70	\$650.00	\$455.00
4/21/2020	Kristin Kemnitzer	conf re settlement strategy; conf with atty re same; conf with opposing counsel re same; review status of settlement negotiations	1.70	\$650.00	\$1,105.00
4/22/2020	Kristin Kemnitzer	conf re settlement strategy	0.70	\$650.00	\$455.00
5/4/2020	Bryan Kemnitzer	emails re status of case and issues re settlement discussions call to KK	0.30	\$850.00	\$255.00
5/5/2020	Bryan Kemnitzer	review emails re issues in case and settlement call to KK	0.20	\$850.00	\$170.00
5/13/2020	Bryan Kemnitzer	call from atty for McCoy discussing case with KK review emails	0.20	\$850.00	\$170.00
5/13/2020	Kristin Kemnitzer	Conf re mccoy settlement; conf with staff re stip	0.60	\$650.00	\$390.00
5/15/2020	Kristin Kemnitzer	stip re MSC	0.30	\$650.00	\$195.00
5/18/2020	Kristin Kemnitzer	Conf re settlement strategy	0.20	\$650.00	\$130.00
5/22/2020	Kristin Kemnitzer	review NDCal standing orders re corona; conf with opposing counsel re stip	0.20	\$650.00	\$130.00
5/26/2020	Kristin Kemnitzer	Review past settlement discussions and mediation; prepare for MSC	0.80	\$650.00	\$520.00
5/27/2020	Kristin Kemnitzer	Draft and edit settlement matrix; conf with attys re same	2.20	\$650.00	\$1,430.00
5/28/2020	Kristin Kemnitzer	multiple conf and emails re matrix	0.80	\$650.00	\$520.00
6/2/2020	Bryan Kemnitzer	review issues in case call to KK and discuss settlement demand and case issues re Nationstar	0.40	\$850.00	\$340.00
7/1/2020	Kristin Kemnitzer	review judge Ryu's standing orders; draft matrix and mediation brief outline	1.20	\$650.00	\$780.00
7/6/2020	Kristin Kemnitzer	draft MSC statement; conf with attys re same; conf with opposing counsel re M&C times	1.50	\$650.00	\$975.00

GROUPED BY Activity Item

KB DETAILED REPORT

7/6/2020	Bryan Kemnitzer	email re issues in case and call review court order re settlement conference discussing case with KK	0.80	\$850.00	\$680.00
7/7/2020	Kristin Kemnitzer	Draft MSC statement	5.50	\$650.00	\$3,575.00
7/7/2020	Bryan Kemnitzer	preparing for settlement conference and issues in case re Nationstar review class briefs and MSJ lengthy discussion with KK re case issues	1.00	\$850.00	\$850.00
7/8/2020	Kristin Kemnitzer	emails re M&C; draft MSC statements; attend M&C	4.70	\$650.00	\$3,055.00
7/9/2020	Kristin Kemnitzer	draft MSC briefs; conf with counsel re same; craft legal theories; determine strategy for mediation	5.50	\$650.00	\$3,575.00
7/9/2020	Bryan Kemnitzer	prepare for call discussing case with KK review case issues conference call with KK AL and Nat	1.50	\$850.00	\$1,275.00
7/10/2020	Kristin Kemnitzer	prep MSC statement	0.30	\$650.00	\$195.00
7/15/2020	Kristin Kemnitzer	continue to draft MSC statements	2.20	\$650.00	\$1,430.00
7/16/2020	Kristin Kemnitzer	Finalize MSC briefs	0.50	\$650.00	\$325.00
7/17/2020	Kristin Kemnitzer	Finalize MSC briefs; confs re same; review defendants' brief	0.70	\$650.00	\$455.00
7/19/2020	Bryan Kemnitzer	review settlement conference briefs and exhibits and case issues memo	0.80	\$850.00	\$680.00
7/20/2020	Bryan Kemnitzer	discussing status of case with KK and MSC and issues re settlement	0.20	\$850.00	\$170.00
7/24/2020	Kristin Kemnitzer	Prep for MSC; conf with attys and client re same	1.50	\$650.00	\$975.00
7/24/2020	Bryan Kemnitzer	Zoom call with client re prep for MSC and case issues re class settlement	0.50	\$850.00	\$425.00
7/26/2020	Mark Chavez	rev settlement conference briefs; t/c Kristin re settlement	1.80	\$950.00	\$1,710.00
7/26/2020	Bryan Kemnitzer	preparing for MSC review briefs and exhibits and McCoy settlement	0.50	\$850.00	\$425.00
7/26/2020	Kristin Kemnitzer	Prep for MSC, call re same	1.70	\$650.00	\$1,105.00
7/27/2020	Kristin Kemnitzer	Prep for MSC; attend MSC; debrief MSC	6.60	\$650.00	\$4,290.00
7/27/2020	Bryan Kemnitzer	attend MSC via Zoom discussing case with atty's and Judge memo re issues and next MSC	4.00	\$850.00	\$3,400.00
7/28/2020	Kristin Kemnitzer	Debrief MSC; determine fee response; review minute order	0.20	\$650.00	\$130.00
7/28/2020	Bryan Kemnitzer	discussing case with KK re MSC and stipulation and issue re fees and court hearing re MSC	0.40	\$850.00	\$340.00
7/29/2020	Bryan Kemnitzer	memo re issues re fees and costs discussing case with KK	0.30	\$850.00	\$255.00
7/29/2020	Kristin Kemnitzer	Review stip; conf with co-counsel; conf with opposing counsel; determine fee demand	0.70	\$650.00	\$455.00
8/4/2020	Kristin Kemnitzer	conf re attys fees demand	0.60	\$650.00	\$390.00
8/5/2020	Kristin Kemnitzer	Finalize fee demand	0.50	\$650.00	\$325.00
8/6/2020	Kristin Kemnitzer	settlement discussions	0.20	\$650.00	\$130.00
8/14/2020	Bryan Kemnitzer	email from atty for Nationstar re class issues and settlement	0.30	\$850.00	\$255.00

GROUPED BY Activity Item

KB DETAILED REPORT

8/17/2020	Bryan Kemnitzer	emails re case and issues re settlement and status call to KK review matrix	0.30	\$850.00	\$255.00
8/17/2020	Kristin Kemnitzer	review defendants' proposal; conf with counsel re same; update matrix	1.40	\$650.00	\$910.00
8/18/2020	Kristin Kemnitzer	Prepare matrix; send to opposing counsel	0.50	\$650.00	\$325.00
8/18/2020	Bryan Kemnitzer	review emails from Nationstar re case and settlement issues	0.20	\$850.00	\$170.00
8/20/2020	Kristin Kemnitzer	Review emails from opposing counsel re SAR; review emails from client	0.30	\$650.00	\$195.00
8/21/2020	Kristin Kemnitzer	Multiple emails re joint status report; finalize joint status report	1.40	\$650.00	\$910.00
8/24/2020	Kristin Kemnitzer	prep for MSC	0.50	\$650.00	\$325.00
8/25/2020	Kristin Kemnitzer	Prep for MSC; attend MSC; debrief MSC	5.00	\$650.00	\$3,250.00
8/26/2020	Kristin Kemnitzer	confs re settlement	0.30	\$650.00	\$195.00
8/28/2020	Kristin Kemnitzer	multiple confs re notice, pricing, SAR	0.40	\$650.00	\$260.00
8/31/2020	Kristin Kemnitzer	Review ND Cal preliminary and final approval guidelines; conf with opposing counsel re SAR; conf with atty re same	0.60	\$650.00	\$390.00
9/11/2020	Kristin Kemnitzer	Emails re RFP class admin	0.30	\$650.00	\$195.00
9/21/2020	Kristin Kemnitzer	edit administrator proposal; conf with counsel re same	0.30	\$650.00	\$195.00
9/22/2020	Kristin Kemnitzer	send out proposal	0.30	\$650.00	\$195.00
9/24/2020	Kristin Kemnitzer	Review all class admin proposals	0.30	\$650.00	\$195.00
9/30/2020	Kristin Kemnitzer	multiple emails re settlement	0.30	\$650.00	\$195.00
10/2/2020	Kristin Kemnitzer	Edit SAR and corresponding docs	1.20	\$650.00	\$780.00
10/6/2020	Kristin Kemnitzer	Review SAR; conf with counsel re same	0.60	\$650.00	\$390.00
11/1/2020	Kristin Kemnitzer	review edits to notice and claim form; email to opposing counsel re same	0.40	\$650.00	\$260.00
11/2/2020	Kristin Kemnitzer	Emails re SAR docs	0.30	\$650.00	\$195.00
11/3/2020	Kristin Kemnitzer	Review Defendants' edits to SAR; edit accordingly; conf with counsel re same	0.60	\$650.00	\$390.00
11/4/2020	Kristin Kemnitzer	Review and edit SAR; conf with counsel re same	0.60	\$650.00	\$390.00
11/4/2020	Adam McNeile	Conduct research re Form 1099-MISC for attorneys' fees in context of class action; discuss same.	0.80	\$650.00	\$520.00
11/5/2020	Kristin Kemnitzer	SAR; emails with counsel and opposing counsel re same	0.50	\$650.00	\$325.00
11/19/2020	Kristin Kemnitzer	emails re SAR	0.30	\$650.00	\$195.00
11/24/2020	Kristin Kemnitzer	Review SAR draft; conf with counsel re same	0.70	\$650.00	\$455.00
11/25/2020	Kristin Kemnitzer	settlement agreement and release; conf re edits to same	1.00	\$650.00	\$650.00
11/30/2020	Kristin Kemnitzer	prelim approval emails and correspondence	0.30	\$650.00	\$195.00
12/1/2020	Kristin Kemnitzer	emails re SAR	0.30	\$650.00	\$195.00
12/7/2020	Kristin Kemnitzer	Follow up re SAR	0.20	\$650.00	\$130.00

GROUPED BY Activity Item

KB DETAILED REPORT

12/14/2020	Kristin Kemnitzer	Review edits; finalize SAR; send to opposing counsel; conf with counsel	0.40	\$650.00	\$260.00
12/15/2020	Kristin Kemnitzer	Version control of SAR and exhibits; conf with counsel and opposing counsel re same; conf with clients re SAR	1.50	\$650.00	\$975.00
2/12/2021	Kristin Kemnitzer	Review website; conf re same	0.20	\$650.00	\$130.00
4/25/2021	Adam McNeile	Review and revise claim form	1.30	\$650.00	\$845.00
4/26/2021	Adam McNeile	Emails re class notice and claim form.	0.30	\$650.00	\$195.00
4/29/2021	Kristin Kemnitzer	review edits to claim form and class notice; conf with counsel re same; conf with opposing counsel re same	1.10	\$650.00	\$715.00
5/3/2021	Sean Barry	email from opposing counsel re amended class notice	0.10	\$275.00	\$27.50
5/5/2021	Kristin Kemnitzer	follow up re class notice, claim form, joint statement	0.10	\$650.00	\$65.00
5/11/2021	Sean Barry	emails (4) from Kristin Kemnitzer re revised class notice; email from Adam McNeile re revised class notice	0.20	\$275.00	\$55.00
5/13/2021	Sean Barry	email from co-counsel re revised class notice, claim form; emails (4) from Kristin Kemnitzer re revised class notice, claim form; emails (2) from opposing counsel re revised class notice, claim form	0.30	\$275.00	\$82.50
5/17/2021	Sean Barry	Telephone call from Kristin Kemnitzer re revised class notice, claim form; emails (3) from opposing counsel re revised class notice; emails (5) from Kristin Kemnitzer re revised class notice, claim form; email from co-counsel re revised class notice, claim form	0.60	\$275.00	\$165.00
5/20/2021	Sean Barry	Researched revised class notice, claim form	0.10	\$275.00	\$27.50
8/10/2021	Mark Chavez	t/c Kristin re status of settlement and possible remand	0.20	\$950.00	\$190.00
8/11/2021	Mark Chavez	t/c Kristin re status and strategy	0.20	\$950.00	\$190.00
8/13/2021	Sean Barry	Reviewed email from co-counsel re SAR; reviewed email from Kristin Kemnitzer re SAR	0.10	\$275.00	\$27.50
11/3/2021	Sean Barry	Reviewed email from class administrator re class notice	0.10	\$275.00	\$27.50
11/4/2021	Sean Barry	Reviewed email from co-counsel re notice timeline	0.10	\$275.00	\$27.50
11/5/2021	Sean Barry	Reviewed email from co-counsel re class notice	0.10	\$275.00	\$27.50
11/8/2021	Sean Barry	Reviewed email from class administrator re class notice, claim form	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

11/9/2021	Sean Barry	Reviewed email from class administrator re timeline	0.10	\$275.00	\$27.50
11/11/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re class notice	0.10	\$275.00	\$27.50
11/12/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re preliminary approval	0.10	\$275.00	\$27.50
11/19/2021	Sean Barry	Reviewed email from client re preliminary approval	0.10	\$275.00	\$27.50
L160: TOTAL:			145.80		\$101,265.00
L200: - Pre-Trial Pleadings and Motions					
2/27/2017	Kristin Kemnitzer	Toland: Follow up with clients re meeting time; conf with clients re damages	0.70	\$650.00	\$455.00
2/28/2017	Kristin Kemnitzer	Toland: Prep for client meeting; client meeting; follow up to client meeting	0.70	\$650.00	\$455.00
3/1/2017	Kristin Kemnitzer	Toland: Draft complaint; review docs for complaint; review loan origination docs; review collection letters; conf with AL re same; research corporate entities for complaint	2.10	\$650.00	\$1,365.00
3/2/2017	Kristin Kemnitzer	Toland: Research notice of related case for complaint filing; conf with clients re credit reports; conf with co counsel re complaint and debt collector	0.50	\$650.00	\$325.00
3/3/2017	Kristin Kemnitzer	Toland: Review and edit complaint; conf with co counsel re same	0.90	\$650.00	\$585.00
3/4/2017	Kristin Kemnitzer	Review Joint CMC statement date	0.10	\$650.00	\$65.00
3/8/2017	Kristin Kemnitzer	Toland: Review correspondence re complaint; conf re same; draft notice of related case	1.10	\$650.00	\$715.00
3/9/2017	Kristin Kemnitzer	Toland: Review file; conf with staff re same; conf with co counsel re complaint and standing; conf with clients re complaint and remaining documents	0.50	\$650.00	\$325.00
3/13/2017	Kristin Kemnitzer	Toland: Review and manage all new files; conf with clients re same; conf with staff re files and billing; edit and finalize complaint	1.70	\$650.00	\$1,105.00
3/14/2017	Kristin Kemnitzer	Prep filing; conf with staff re same and time entry; inform BK of status; review all credit reports	0.80	\$650.00	\$520.00
3/22/2017	Kristin Kemnitzer	Review filing status	0.10	\$650.00	\$65.00
3/23/2017	Adam McNeile	Work on issues related to filing complaint.	0.20	\$650.00	\$130.00
3/23/2017	Bryan Kemnitzer	Review class action complaint and issue regarding Nationstar Mortgage, memo regarding case issues.	0.80	\$850.00	\$680.00
3/23/2017	Kristin Kemnitzer	Follow up with SB on filing	0.20	\$650.00	\$130.00
3/23/2017	Sean Barry	Reviewed and edited complaint; researched, prepared and redacted exhibits; drafted Summons, CCCS, Notice of Related Case	1.40	\$250.00	\$350.00

GROUPED BY Activity Item

KB DETAILED REPORT

3/24/2017	Kristin Kemnitzer	review filing; follow up with co counsel	0.30	\$650.00	\$195.00
3/31/2017	Kristin Kemnitzer	Status update with clients re filing and continued debt collection; review new docs	0.20	\$650.00	\$130.00
4/28/2017	Bryan Kemnitzer	Discuss case with Eric K. regarding class action and issue regarding Nationstar; e-mail to A.L. & Kristin.	0.20	\$850.00	\$170.00
5/5/2017	Kristin Kemnitzer	Review removal notice; conf with co counsel re same	0.40	\$650.00	\$260.00
5/8/2017	Kristin Kemnitzer	review FDCPA liability; conf with attys re remand	0.20	\$650.00	\$130.00
5/9/2017	Kristin Kemnitzer	review remand deadline; update case status; review motion to remove; conf with co counsel re motion to remand; conf with opposing counsel re stip	0.50	\$650.00	\$325.00
5/11/2017	Kristin Kemnitzer	draft remand motion; review complaint and Banks motion	1.20	\$650.00	\$780.00
5/15/2017	Kristin Kemnitzer	Draft notice of remand; conf with co counsel re same; research CAFA; review complaint	2.70	\$650.00	\$1,755.00
5/16/2017	Kristin Kemnitzer	draft and edit motion for remand	1.90	\$650.00	\$1,235.00
5/16/2017	Sean Barry	Edited Declination of Magistrate	0.10	\$275.00	\$27.50
5/24/2017	Kristin Kemnitzer	Review reassignment order; conf with opposing counsel and co counsel re extension and remand	0.30	\$650.00	\$195.00
6/6/2017	Kristin Kemnitzer	review date change for motion for remand	0.10	\$650.00	\$65.00
6/16/2017	Kristin Kemnitzer	conf with AL, staff re CMC statement; research docket; review email re extension	0.40	\$650.00	\$260.00
6/16/2017	Bryan Kemnitzer	Discuss status of case with Kristin call to Eric K regarding extension ; memo.	0.20	\$850.00	\$170.00
6/19/2017	Kristin Kemnitzer	conf re extension to reply; review emails re same; conf with BK re same; conf with opposing counsel re stip; review stip	0.50	\$650.00	\$325.00
6/20/2017	Kristin Kemnitzer	Review reply on opposition motion to remand; conf with co counsel re same; conf with staff re reply; review opposition; notes re reply	1.30	\$650.00	\$845.00
6/21/2017	Kristin Kemnitzer	review opposition, read cases cited in opp, notes on opp, conf with co counsel re same	2.40	\$650.00	\$1,560.00
6/23/2017	Kristin Kemnitzer	Review and edit reply on motion for remand; conf with co counsel re same	1.40	\$650.00	\$910.00
6/27/2017	Kristin Kemnitzer	Review filing	0.10	\$650.00	\$65.00
7/5/2017	Kristin Kemnitzer	conf with co counsel and opposing counsel re 26(f) conference; research 26(f) and ADR	0.30	\$650.00	\$195.00
7/10/2017	Kristin Kemnitzer	prep for 26(f) conference; review ADR requirements; conf with AL re conference; conf with clients re ADR disclosures; conf with staff re initial disclosures and file	1.80	\$650.00	\$1,170.00
7/11/2017	Kristin Kemnitzer	prep for 26(f) call; conf with client; 26(f) call; follow up to call;	1.90	\$650.00	\$1,235.00
7/12/2017	Kristin Kemnitzer	follow up on 26(f) conference; conf with co counsel re ADR certification and 26(f) conference	0.80	\$650.00	\$520.00

GROUPED BY Activity Item

KB DETAILED REPORT

7/13/2017	Sean Barry	Drafted ADR Certifications	0.20	\$275.00	\$55.00
7/24/2017	Kristin Kemnitzer	review and edit joint cmc statement and proposed PO; call AL re same; send to opposing counsel; document management	0.50	\$650.00	\$325.00
7/26/2017	Kristin Kemnitzer	Conf with AL re 26(f) disclosures; conf with staff re redaction; review redaction; review defendants' edits to PO and joint cmc statement; conf with AL re same; revise PO and joint CMC statement; conf with opposing counsel re same	2.20	\$650.00	\$1,430.00
7/27/2017	Kristin Kemnitzer	review production to ensure proper redaction and confidentiality designation; conf with staff re same; conf with opposing counsel re joint CMC statement and production; follow up with staff re filing and PO; conf with client re document production	1.90	\$650.00	\$1,235.00
7/27/2017	Sean Barry	Reviewed and edited Protective Order , Case Management Conference Statement	0.30	\$275.00	\$82.50
8/3/2017	Kristin Kemnitzer	hearing recap	0.20	\$650.00	\$130.00
8/24/2017	Kristin Kemnitzer	emails and calls re extension; review and respond to stip	0.30	\$650.00	\$195.00
9/5/2017	Kristin Kemnitzer	review supplemental declaration and brief; prep for meeting with co counsel; research experts re statistical sampling; conf with expert	3.10	\$650.00	\$2,015.00
9/6/2017	Kristin Kemnitzer	conf with experts re declaration; conf with co counsel re same; retain expert	1.40	\$650.00	\$910.00
9/8/2017	Kristin Kemnitzer	Correspondence re expert declaration; review initial comments; draft response to supplemental opposition	1.80	\$650.00	\$1,170.00
9/10/2017	Bryan Kemnitzer	review experts reports regarding statistical information and status of case.	0.50	\$850.00	\$425.00
9/11/2017	Kristin Kemnitzer	Review expert's draft declaration; conf with AL re same	0.40	\$650.00	\$260.00
9/12/2017	Kristin Kemnitzer	Review AL edits; conf with AL re same; conf with expert re declaration; edit declaration; conf with expert re declaration	1.00	\$650.00	\$650.00
9/12/2017	Sean Barry	Drafted response to OSC; prepared exhibits; drafted Proof of Service	0.70	\$275.00	\$192.50
9/13/2017	Kristin Kemnitzer	Review newest draft of expert report; conf with AL re same; draft response to supplemental evidence	2.70	\$650.00	\$1,755.00
9/14/2017	Kristin Kemnitzer	expert's declaration; review expert's cv; conf with AL re same; review and edit final response; conf with staff re filing	0.70	\$650.00	\$455.00
9/18/2017	Sean Barry	Reviewed and edited supplemental reply	0.30	\$275.00	\$82.50
9/28/2017	Sean Barry	Drafted Notice of Order, Proof of Service	0.10	\$275.00	\$27.50
11/7/2017	Kristin Kemnitzer	conf re joint CMC statement	0.20	\$650.00	\$130.00
11/8/2017	Sean Barry	Drafted declaration and request for continuance; researched and marked exhibits	0.40	\$275.00	\$110.00

GROUPED BY Activity Item

KB DETAILED REPORT

11/14/2017	Sean Barry	Reviewed and edited Declaration and Request for Continuance; prepared exhibits; drafted Proof of Service	0.50	\$275.00	\$137.50
11/20/2017	Kristin Kemnitzer	emails re CMC	0.10	\$650.00	\$65.00
11/20/2017	Sean Barry	Drafted Notice of Order, Proof of Service	0.20	\$275.00	\$55.00
3/16/2018	Kristin Kemnitzer	emails re CMC and next steps	0.30	\$650.00	\$195.00
3/26/2018	Kristin Kemnitzer	emails re ruling and expert invoice	0.30	\$650.00	\$195.00
4/6/2018	Kristin Kemnitzer	Conf with potential witness/class member	0.40	\$650.00	\$260.00
4/10/2018	Sean Barry	Drafted Notice of Order, Proof of Service	0.10	\$275.00	\$27.50
5/7/2018	Kristin Kemnitzer	Conf with attys re strategy for moving case forward including stipulation to remand and discovery	0.30	\$650.00	\$195.00
5/7/2018	Bryan Kemnitzer	Discuss status of case with Kristin regarding status regarding court and removal motion and issues regarding attorney.	0.20	\$850.00	\$170.00
5/9/2018	Bryan Kemnitzer	Discuss status of case with Kristin and A.L. regarding status of case and court call to J Sullivan?	0.40	\$850.00	\$340.00
5/9/2018	Kristin Kemnitzer	conf with attys re status and trying to move the case forward; strategy calls	0.40	\$650.00	\$260.00
7/13/2018	Kristin Kemnitzer	Review denial of motion to remand; conf with counsel re same	0.30	\$650.00	\$195.00
7/16/2018	Kristin Kemnitzer	Review case status and CAFA; conf with co counsel re next steps; review file for initial disclosures; conf with staff re initial disclosures; draft email to opposing counsel re same	1.20	\$650.00	\$780.00
7/18/2018	Kristin Kemnitzer	emails re disclosures to co counsel, opposing counsel, and staff	0.30	\$650.00	\$195.00
9/5/2018	Kristin Kemnitzer	begin reviewing docs	0.80	\$650.00	\$520.00
10/4/2018	Kristin Kemnitzer	Review new joint CMC date; review discovery date; review docket; conf with staff re same	0.40	\$650.00	\$260.00
10/5/2018	Kristin Kemnitzer	Review ND Cal Standing orders and judge Donato's standing orders; draft joint CMC statement; confs with co counsel	2.20	\$650.00	\$1,430.00
10/8/2018	Kristin Kemnitzer	emails re joint CMC statement	0.10	\$650.00	\$65.00
10/10/2018	Sean Barry	Reviewed and edited Joint Statement	0.10	\$275.00	\$27.50
10/10/2018	Kristin Kemnitzer	Review edits to joint cmc statement; conf with co counsel re same; conf with opposing counsel; conf with staff	0.60	\$650.00	\$390.00
10/17/2018	Kristin Kemnitzer	debrief re CMC, class cert dates, and depos/discovery dates	0.20	\$650.00	\$130.00
2/15/2019	Sean Barry	Drafted Notice of Change of Address (USDC); email to Court re Notice of Change of Address; email from Court re case activity; document management	0.40	\$275.00	\$110.00
4/23/2019	Kristin Kemnitzer	Research re data expert; conf with co counsel re same; review depo transcript for expertise on data mining	1.70	\$650.00	\$1,105.00

GROUPED BY Activity Item

KB DETAILED REPORT

5/6/2019	Kristin Kemnitzer	emails and calls with co counsel re Nationstar's refusal to participate; review discovery conference follow up	0.50	\$650.00	\$325.00
6/5/2019	Kristin Kemnitzer	emails with co counsel re case status and discovery conference	0.20	\$650.00	\$130.00
6/6/2019	Kristin Kemnitzer	Conf re hearing and in person M&C	0.40	\$650.00	\$260.00
6/9/2019	Kristin Kemnitzer	Prep for discovery conference	0.60	\$650.00	\$390.00
6/10/2019	Kristin Kemnitzer	attend court ordered discovery conference	2.10	\$650.00	\$1,365.00
6/12/2019	Kristin Kemnitzer	Review PMK categories; conf with attys re same	0.40	\$650.00	\$260.00
6/18/2019	Kristin Kemnitzer	Review correspondence re Joint CMC statement; draft joint CMC statement; conf re depositions	0.70	\$650.00	\$455.00
6/20/2019	Kristin Kemnitzer	conf with counsel and clients re depositions	0.30	\$650.00	\$195.00
6/21/2019	Kristin Kemnitzer	call clients re depo dates; conf with counsel re same; conf	1.10	\$650.00	\$715.00
6/24/2019	Kristin Kemnitzer	Conf with co counsel, clients, opposing counsel re organizing depositions	1.10	\$650.00	\$715.00
6/25/2019	Sean Barry	Edited Case Management Conference Statement; drafted Proof of Service	0.20	\$275.00	\$55.00
6/27/2019	Kristin Kemnitzer	review email from opposing counsel re PMK categories	0.30	\$650.00	\$195.00
7/3/2019	Sean Barry	Drafted Notice of Entry of Dismissal and Proof of Service	0.10	\$275.00	\$27.50
7/12/2019	Kristin Kemnitzer	emails re depo prep	0.20	\$650.00	\$130.00
9/18/2019	Kristin Kemnitzer	review memo re actual damages; conf re actual damages and interest rates;	0.70	\$650.00	\$455.00
9/19/2019	Kristin Kemnitzer	Correspondence re elements of claim and proof for class cert	0.30	\$650.00	\$195.00
9/20/2019	Kristin Kemnitzer	Review case law re FCRA damage standard; research FCRA cases; memo re damages, data, CCCRAA; conf with co counsel re same; conf with expert re damages	2.60	\$650.00	\$1,690.00
10/1/2019	Kristin Kemnitzer	Review memos re CCCRAA damage, standing, injury, class cert, expert rebuttal reports; strategy conf re same	2.50	\$650.00	\$1,625.00
10/7/2019	Kristin Kemnitzer	conf re case status and strategy	1.10	\$650.00	\$715.00
10/31/2019	Kristin Kemnitzer	conf re settlement	0.30	\$650.00	\$195.00
11/7/2019	Bryan Kemnitzer	attend court hearing re discovery and schedule discussing case and settlement issues with AL & EK	1.00	\$850.00	\$850.00
12/2/2019	Bryan Kemnitzer	discussing case with AL review release and defendants and issue re case and objection on behalf of Tolands to preserve Toland class action	0.50	\$850.00	\$425.00
12/3/2019	Bryan Kemnitzer	preparing for call re objection to McCoy settlement discussing case with attys memo re issues discussing with AL and Natalie	1.50	\$850.00	\$1,275.00

GROUPED BY Activity Item

KB DETAILED REPORT

12/4/2019	Bryan Kemnitzer	review status of case re objection to McCoy settlement on behalf of Tolands to preserve Toland class action and issues re filing objection discussing with AL and KK	1.50	\$850.00	\$1,275.00
12/4/2019	Kristin Kemnitzer	Review sample objections; conf with attys re same	3.10	\$650.00	\$2,015.00
12/5/2019	Kristin Kemnitzer	Prep for objection; review notice; conf with attys re same	2.60	\$650.00	\$1,690.00
12/5/2019	Bryan Kemnitzer	lengthy discussion re status of case and procedure re objection discussing with AL and KK review other objections	2.00	\$850.00	\$1,700.00
12/6/2019	Bryan Kemnitzer	further review of cases re class actions and objections and issues re McCoy release call to plaintiff attys	1.00	\$850.00	\$850.00
12/6/2019	Kristin Kemnitzer	Conf re objection strategy; debrief conf; call McCoy P's counsel	1.10	\$650.00	\$715.00
12/9/2019	Bryan Kemnitzer	discussing case with plaintiffs atty in McCoy discussing case with KK &AL review reasons for objection to class	1.50	\$850.00	\$1,275.00
12/9/2019	Kristin Kemnitzer	prepare objection to McCoy	2.60	\$650.00	\$1,690.00
12/11/2019	Kristin Kemnitzer	Draft and edit objections; multiple confs re same	4.30	\$650.00	\$2,795.00
12/11/2019	Bryan Kemnitzer	review opposition to McCoy settlement discussing case with KK and AL call to atty for McCoy memo re pleadings	1.00	\$850.00	\$850.00
12/12/2019	Kristin Kemnitzer	prep for objections; multiple confs re counsel	2.30	\$650.00	\$1,495.00
12/12/2019	Bryan Kemnitzer	discussing case with AL & KK and with McCoy atty Jason Saccusso review objection and related case notice	1.00	\$850.00	\$850.00
12/13/2019	Kristin Kemnitzer	edit objections to McCoy; attempt to reach opposing counsel re objections and notice of related cases	2.10	\$650.00	\$1,365.00
12/16/2019	Kristin Kemnitzer	Conf re McCoy objections and mandatory settlement conference; multiple conf with atty re McCoy objections; attempt to reach opposing counsel for second time; conf with opposing counsel re McCoy	2.20	\$650.00	\$1,430.00
12/16/2019	Bryan Kemnitzer	discussing case with atty Mark L re McCoy and objection and issue re Nationstar discussing case with Kristin	1.50	\$850.00	\$1,275.00
12/17/2019	Kristin Kemnitzer	Research notice of related cases	0.30	\$650.00	\$195.00
12/18/2019	Kristin Kemnitzer	Conf with counsel re objections; review and emails re notice of lodging objection	0.30	\$650.00	\$195.00
12/18/2019	Bryan Kemnitzer	review status of case call to atty's for McCoy re issues in case re objections and final approval	0.40	\$850.00	\$340.00
12/19/2019	Bryan Kemnitzer	discussing status of case with Kristin email from court re issues re schedule and settlement conference	0.40	\$850.00	\$340.00
12/19/2019	Kristin Kemnitzer	prep for hearing	0.20	\$650.00	\$130.00
1/6/2020	Kristin Kemnitzer	conf re mandatory settlement conference	0.20	\$650.00	\$130.00
1/8/2020	Kristin Kemnitzer	emails re class cert	0.20	\$650.00	\$130.00

GROUPED BY Activity Item

KB DETAILED REPORT

1/9/2020	Kristin Kemnitzer	review/edit class cert motion and declarations; conf with attys re same	3.40	\$650.00	\$2,210.00
1/9/2020	Bryan Kemnitzer	lenthly discussion with atty for McCoy draft declaration re case issues review class cert motion discussing case with KK	2.50	\$850.00	\$2,125.00
1/9/2020	Kristin Kemnitzer	Review McCoy case and response to objections; conf with counsel re objections	0.50	\$650.00	\$325.00
1/10/2020	Kristin Kemnitzer	conf re class cert brief	0.60	\$650.00	\$390.00
1/10/2020	Sean Barry	Drafted McCoy Notice of Appearance	0.20	\$275.00	\$55.00
1/10/2020	Bryan Kemnitzer	review issues re objection to McCoy settlement review McCoy final approval motion and Vivoli declaration	1.50	\$850.00	\$1,275.00
1/12/2020	Bryan Kemnitzer	preparing detailed analysis re issues re McCoy and objection and issues re final approval draft declaration	2.50	\$850.00	\$2,125.00
1/12/2020	Kristin Kemnitzer	Review McCoy final approval motion and attys fees motion; conf with atty re same	0.50	\$650.00	\$325.00
1/13/2020	Bryan Kemnitzer	discussing case with KK and with AL re objection in MCCoy and issues re opposing counsel and discovery review draft of declaration	2.50	\$850.00	\$2,125.00
1/13/2020	Kristin Kemnitzer	prep class cert	1.60	\$650.00	\$1,040.00
1/13/2020	Kristin Kemnitzer	research mccoys protective order; conf with atty re next steps and objection in McCoy; research objectors and discovery	1.10	\$650.00	\$715.00
1/14/2020	Bryan Kemnitzer	discussing case with KK re issues re reply to motion for final approval and issues re objection review cases	1.50	\$850.00	\$1,275.00
1/14/2020	Kristin Kemnitzer	Compare protective orders in McCoy and Toland; legal research re objections; conf with atty re same	1.20	\$650.00	\$780.00
1/15/2020	Bryan Kemnitzer	review draft of declaration re opposition to final approval in McCoy discussing case with KK and email to Jon Hubbard	1.50	\$850.00	\$1,275.00
1/15/2020	Kristin Kemnitzer	draft M&C letter in McCoy; draft response to final approval; conf with attys re strategy; research objections and discovery rights of objectors	5.50	\$650.00	\$3,575.00
1/16/2020	Bryan Kemnitzer	preparing for McCoy final approval draft declaration re issues and memo re opposition P&As	2.00	\$850.00	\$1,700.00
1/16/2020	Sean Barry	Drafted Notice of Change of Address, Proof of Service	0.30	\$275.00	\$82.50
1/16/2020	Kristin Kemnitzer	draft and edit McCoy M&C letter; conf with co counsel re same; draft objections	9.50	\$650.00	\$6,175.00
1/17/2020	Kristin Kemnitzer	research other Nationstar cases; review prelim approval, final approval, prep for m&C, call opposing counsel	9.40	\$650.00	\$6,110.00
1/18/2020	Bryan Kemnitzer	review draft of objections to McCoy and issues in case and settlement discussing case with atty	2.00	\$850.00	\$1,700.00
1/20/2020	Kristin Kemnitzer	McCoy objections	0.40	\$650.00	\$260.00

GROUPED BY Activity Item

KB DETAILED REPORT

1/21/2020	Kristin Kemnitzer	Prep for mccoys counsel call; attend call; debrief call; draft McCoy FA response; reserach cases; conf with co counsel, conf with opposing counsel, draft declaration	9.70	\$650.00	\$6,305.00
1/21/2020	Bryan Kemnitzer	discussing case with KK re McCoy call to atty for McCoy and Nationstar email to atty re issues re final approval	2.50	\$850.00	\$2,125.00
1/21/2020	Mark Chavez	review of pleadings in McCoy case and res re settlement and objections; rev and prep emails re objections	1.20	\$950.00	\$1,140.00
1/22/2020	Kristin Kemnitzer	research new case law in southern district re class action approval; draft M&C letter following call with McCoy Counsel; draft response to final approval; edit based on comments; draft declaration	6.10	\$650.00	\$3,965.00
1/22/2020	Mark Chavez	res re objections to McCoy settlement; confs with Kristin re settlement and Rule 23(e) issues; rev draft reply brief; prep of outline of argument points	6.30	\$950.00	\$5,985.00
1/23/2020	Adam McNeile	Review and revise objection to final approval.	1.10	\$650.00	\$715.00
1/23/2020	Kristin Kemnitzer	draft and edit response; multiple confs with attys re drafts adn strategy	8.30	\$650.00	\$5,395.00
1/23/2020	Mark Chavez	rev communications with plaintiff's counsel in McCoy; rev background docs; conf with Kristin and Adam re status and strategy	1.90	\$950.00	\$1,805.00
1/24/2020	Sean Barry	Reviewed and edited points and authorities , tables of contents and authorities; reviewed and edited declaration; researched and marked exhibits	1.50	\$275.00	\$412.50
1/24/2020	Kristin Kemnitzer	Finalize response; debrief response	2.10	\$650.00	\$1,365.00
1/24/2020	Mark Chavez	rev and prep emails re brief; conf with Kristin; rev final version of brief	1.20	\$950.00	\$1,140.00
1/27/2020	Kristin Kemnitzer	Prep for MSC call; attend MSC call; debrief call; email clients re status update	2.30	\$650.00	\$1,495.00
1/28/2020	Bryan Kemnitzer	discussing case with AL and with KK re McCoy case and court hearing	0.30	\$850.00	\$255.00
1/29/2020	Kristin Kemnitzer	emails re deposition transcript	0.20	\$650.00	\$130.00
1/30/2020	Kristin Kemnitzer	review case status and next dates	0.20	\$650.00	\$130.00
1/31/2020	Kristin Kemnitzer	read new case law re certification of emotional distress claims; review McCoy and Nationstar replies	1.40	\$650.00	\$910.00
2/1/2020	Mark Chavez	rev of briefs responding to objections; prep of email re argument	1.70	\$950.00	\$1,615.00
2/3/2020	Mark Chavez	further review of briefs filed by the parties; conf with Kristin re prep for argument on objections	1.00	\$950.00	\$950.00
2/3/2020	Kristin Kemnitzer	Prep for hearing	1.20	\$650.00	\$780.00
2/3/2020	Mark Chavez	research re objections to McCoy settlement	1.20	\$950.00	\$1,140.00
2/4/2020	Kristin Kemnitzer	Read recent final approval cases; prep for hearing; review all case law re frcp 23(e) and comments; draft outline for hearing	3.90	\$650.00	\$2,535.00

GROUPED BY Activity Item

KB DETAILED REPORT

2/7/2020	Bryan Kemnitzer	discussing status of case with KK re McCoy object5ionand court hearing and issues re final approval	0.30	\$850.00	\$255.00
2/7/2020	Kristin Kemnitzer	prep for hearing	0.40	\$650.00	\$260.00
2/10/2020	Sean Barry	Drafted e-service stipulation	0.20	\$275.00	\$55.00
2/10/2020	Kristin Kemnitzer	prep for McCoy hearing; conf with attys re same	0.80	\$650.00	\$520.00
2/11/2020	Kristin Kemnitzer	prep for hearing	0.30	\$650.00	\$195.00
2/12/2020	Kristin Kemnitzer	Prep for McCoy hearing	2.00	\$650.00	\$1,300.00
2/13/2020	Mark Chavez	conferences with Kristin re oral argument and issues in litigation	1.10	\$950.00	\$1,045.00
2/13/2020	Kristin Kemnitzer	Prep for McCoy hearing	8.60	\$650.00	\$5,590.00
2/14/2020	Bryan Kemnitzer	discussing case with KK and court hearing re McCoy and final approval and issues re Nationstar	0.50	\$850.00	\$425.00
2/14/2020	Kristin Kemnitzer	travel to hearing; prep for hearing; attend hearing; debrief hearing	13.50	\$650.00	\$8,775.00
2/18/2020	Kristin Kemnitzer	debrief hearing; conf with counsel re same	1.00	\$650.00	\$650.00
2/19/2020	Kristin Kemnitzer	conf with opposing counsel re case status and stip; follow up with email; conf with attys re same	0.20	\$650.00	\$130.00
2/20/2020	Kristin Kemnitzer	emails with staff re case	0.20	\$650.00	\$130.00
2/21/2020	Kristin Kemnitzer	draft correspondence re amending McCoy SAR; conf with co counsel re same	0.80	\$650.00	\$520.00
2/23/2020	Kristin Kemnitzer	Prep and edit letter re edits to McCoy SAR; send to McCou counsel	0.50	\$650.00	\$325.00
2/26/2020	Kristin Kemnitzer	Review email re class cert	0.40	\$650.00	\$260.00
3/9/2020	Kristin Kemnitzer	Conf re McCoy hearing transcript	0.20	\$650.00	\$130.00
3/17/2020	Kristin Kemnitzer	Review minute orders in Toland and McCoy; conf with attys re same	0.50	\$650.00	\$325.00
3/25/2020	Kristin Kemnitzer	conf with clients re case status	0.30	\$650.00	\$195.00
3/30/2020	Kristin Kemnitzer	Read new case law re class cert standard in 9th cir	0.30	\$650.00	\$195.00
3/31/2020	Kristin Kemnitzer	Review case status; review McCoy order; conf with counsel re same	0.70	\$650.00	\$455.00
3/31/2020	Bryan Kemnitzer	review court order in McCoy re class and discussing case with AL and KK re issues in our case and class cert motion	0.80	\$850.00	\$680.00
4/1/2020	Kristin Kemnitzer	confs re McCoy order	0.30	\$650.00	\$195.00
4/2/2020	Kristin Kemnitzer	Confs re next steps	0.20	\$650.00	\$130.00
4/9/2020	Kristin Kemnitzer	emails re dates	0.20	\$650.00	\$130.00
4/10/2020	Kristin Kemnitzer	emails re trial date	0.20	\$650.00	\$130.00
4/10/2020	Sean Barry	Edited e-service stipulation	0.10	\$275.00	\$27.50
4/14/2020	Kristin Kemnitzer	Review order; conf with counsel re McCoy revised SAR	0.60	\$650.00	\$390.00

GROUPED BY Activity Item

KB DETAILED REPORT

4/16/2020	Bryan Kemnitzer	discussing case with KK re possible settlement and with AL call to atty for Nationstar review status re settlement	0.80	\$850.00	\$680.00
4/16/2020	Kristin Kemnitzer	conf re case strategy; review updated filing and stip	0.80	\$650.00	\$520.00
4/21/2020	Kristin Kemnitzer	Review Nationstar's motions; conf with atty re next steps	2.00	\$650.00	\$1,300.00
4/27/2020	Kristin Kemnitzer	Multiple confs re MSJ/Daubert motions; settlement strategy conf	0.60	\$650.00	\$390.00
4/29/2020	Kristin Kemnitzer	conf re MSC/Daubert; follow up with opposing counsel re MSC	0.30	\$650.00	\$195.00
5/1/2020	Kristin Kemnitzer	Confs re MSJ/Daubert/MSC; review status of hearings and motions; review response from nationstar; conf with defense counsel re MSC	1.30	\$650.00	\$845.00
5/4/2020	Kristin Kemnitzer	prep for MSC call; attend MSC planning call; conf with class reps re same; follow up memo post call	1.50	\$650.00	\$975.00
5/8/2020	Kristin Kemnitzer	email re MSC	0.20	\$650.00	\$130.00
5/18/2020	Kristin Kemnitzer	emails re filings	0.20	\$650.00	\$130.00
5/28/2020	Kristin Kemnitzer	Review court orders	0.30	\$650.00	\$195.00
6/2/2020	Kristin Kemnitzer	edit and review MSJ; confs with attys re same	6.70	\$650.00	\$4,355.00
6/3/2020	Kristin Kemnitzer	edit MSJ; conf with co counsel re same; emails re same; review class cert motion; conf re same and damages theories	2.70	\$650.00	\$1,755.00
6/8/2020	Kristin Kemnitzer	Review MSJ filing; review MSC requirements	0.30	\$650.00	\$195.00
6/18/2020	Kristin Kemnitzer	Research new case law re UCL in federal court; review and edit matriz; conf with co counsel re same	1.30	\$650.00	\$845.00
7/17/2020	Sean Barry	Reviewed and edited MSC Statements; researched and marked exhibits; drafted Proof of Service	1.40	\$275.00	\$385.00
7/31/2020	Sean Barry	Edited stipulation	0.10	\$275.00	\$27.50
12/14/2020	Kristin Kemnitzer	Draft motion for prelim approval	2.90	\$650.00	\$1,885.00
12/21/2020	Kristin Kemnitzer	Draft motion for preliminary approval; review SAR	5.40	\$650.00	\$3,510.00
12/22/2020	Kristin Kemnitzer	Prep motion for preliminary approval	1.30	\$650.00	\$845.00
12/29/2020	Kristin Kemnitzer	Draft Motion for Prelim Approval including reviewing FRCP 23, SAR, class cert motion, and prior settlement negotiations	4.50	\$650.00	\$2,925.00
12/30/2020	Kristin Kemnitzer	Draft preliminary approval motion; review donato's prelim approval orders; draft Kemnitzer decl; draft class reps decl; conf with counsel re same	5.10	\$650.00	\$3,315.00
1/4/2021	Kristin Kemnitzer	prepare motion for prelim approval; conf with staff re same; draft declarations	0.90	\$650.00	\$585.00
1/6/2021	Kristin Kemnitzer	Edit MPA; conf with staff re length and hearing date	0.90	\$650.00	\$585.00
1/7/2021	Kristin Kemnitzer	prep MPA and declarations; multiple confs re same	0.60	\$650.00	\$390.00

GROUPED BY Activity Item

KB DETAILED REPORT

1/8/2021	Kristin Kemnitzer	finalize SAR and signatures; conf with opposing counsel re same; prep MPA and decls; conf with staff re filing; conf with counsel; conf with clients	1.10	\$650.00	\$715.00
1/11/2021	Kristin Kemnitzer	Prepare motion for prelim approval; conf with staff and class reps re same; conf with opposing counsel re same	0.90	\$650.00	\$585.00
1/11/2021	Sean Barry	Drafted motion, stipulation and proposed order re page limits; drafted motion, stipulation and proposed order re shortened time; drafted declaration re shortened time	1.40	\$275.00	\$385.00
1/12/2021	Kristin Kemnitzer	Conf with class admin	0.30	\$650.00	\$195.00
1/13/2021	Kristin Kemnitzer	review decls; conf with class admin; conf with counsel; prep for filing	0.50	\$650.00	\$325.00
1/15/2021	Sean Barry	Reviewed and edited client declarations; researched and marked exhibits	0.80	\$275.00	\$220.00
1/18/2021	Kristin Kemnitzer	multiple confs with JND, opposing counsel, clients re motion for preliminary approval and notice	0.50	\$650.00	\$325.00
1/19/2021	Kristin Kemnitzer	multiple emails re MPA, notice, website	0.60	\$650.00	\$390.00
1/20/2021	Kristin Kemnitzer	Confs with class admin; update declarations and MPA; conf with class admin and opposing counsel re administration	0.80	\$650.00	\$520.00
1/25/2021	Kristin Kemnitzer	Follow up re MPA	0.20	\$650.00	\$130.00
1/26/2021	Sean Barry	Reviewed and edited points & authorities	0.90	\$275.00	\$247.50
1/26/2021	Kristin Kemnitzer	Prep for MPA filing	0.30	\$650.00	\$195.00
1/27/2021	Sean Barry	Reviewed and edited Kemnitzer declaration; reviewed and edited Points & Authorities; drafted tables of contents and authorities; edited administrative motion, declaration	3.90	\$275.00	\$1,072.50
1/27/2021	Kristin Kemnitzer	Emails with class admin	0.30	\$650.00	\$195.00
1/28/2021	Kristin Kemnitzer	Finalize motion	0.30	\$650.00	\$195.00
2/1/2021	Kristin Kemnitzer	conf re motion to shorten time	0.20	\$650.00	\$130.00
2/5/2021	Sean Barry	Reviewed and edited notice, points & authorities, declarations, Proposed Order	0.90	\$275.00	\$247.50
3/29/2021	Kristin Kemnitzer	Review prelim approval hearing date order; conf with counsel re same	0.20	\$650.00	\$130.00
4/1/2021	Kristin Kemnitzer	Confs re prelim approval hearing; review SAR in prep for prelim approval prep	0.50	\$650.00	\$325.00
4/2/2021	Kristin Kemnitzer	Prep for prelim approval hearing	1.00	\$650.00	\$650.00
4/13/2021	Sean Barry	Drafted Notice of Appearance	0.20	\$275.00	\$55.00
4/14/2021	Adam McNeile	Prepare for preliminary approval hearing.	1.30	\$650.00	\$845.00
4/15/2021	Adam McNeile	Prepare for preliminary approval hearing.	0.60	\$650.00	\$390.00

GROUPED BY Activity Item

KB DETAILED REPORT

4/15/2021	Kristin Kemnitzer	Conf with counsel re prepping for prelim approval; follow up after based upon court comments	0.40	\$650.00	\$260.00
4/23/2021	Kristin Kemnitzer	prep for call; call re prelim approval; conf with opposing counsel re same	0.60	\$650.00	\$390.00
5/7/2021	Sean Barry	email from Kristin Kemnitzer re supplemental pleadings	0.10	\$275.00	\$27.50
5/10/2021	Adam McNeile	Review defendant's preliminary approval statement; emails re same.	0.80	\$650.00	\$520.00
5/10/2021	Kristin Kemnitzer	continue to follow up with defendants on edits to class notice, claim form, joint statement	0.70	\$650.00	\$455.00
5/11/2021	Adam McNeile	Discussions re class notice and claim form.	0.60	\$650.00	\$390.00
5/11/2021	Kristin Kemnitzer	M&Cs with opposing counsel re claim form, class notice, prelim approval; conf with counsel re same	1.50	\$650.00	\$975.00
5/11/2021	Sean Barry	emails (4) from Kristin Kemnitzer re joint statement; email from opposing counsel re joint statement; email from Adam McNeile re joint statement	0.20	\$275.00	\$55.00
5/12/2021	Kristin Kemnitzer	review defendants' edits to notice and claim form; conf with counsel re same	0.60	\$650.00	\$390.00
5/13/2021	Kristin Kemnitzer	Revise class notice and claim form; revise joint statement; conf with counsel re same; draft postcard	2.50	\$650.00	\$1,625.00
5/13/2021	Sean Barry	emails (2) from Kristin Kemnitzer re joint statement; em from co-counsel re joint statement	0.20	\$275.00	\$55.00
5/17/2021	Kristin Kemnitzer	Filing of joint statement and exhibits; conf with opposing counsel; finalize exhibits for filing	0.90	\$650.00	\$585.00
5/17/2021	Sean Barry	Telephone call from Kristin Kemnitzer re joint statement; emails (5) from Kristin Kemnitzer re joint statement; emails (3) from opposing counsel re joint statement; reviewed and edited joint statement; researched and marked exhibits; email to Court re joint statement	0.90	\$275.00	\$247.50
5/18/2021	Sean Barry	email from Court re pleading; reviewed Joint Statement; drafted letter to Court re Joint Statement	0.20	\$275.00	\$55.00
5/19/2021	Sean Barry	email from Court re pleading; reviewed joinder	0.10	\$275.00	\$27.50
5/24/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
5/25/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
5/27/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
5/28/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50

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KB DETAILED REPORT

6/2/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/4/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/7/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/8/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/9/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/11/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/19/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/23/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/23/2021	Kristin Kemnitzer	check on case status	0.20	\$650.00	\$130.00
6/25/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/29/2021	Sean Barry	Researched preliminary approval	0.10	\$275.00	\$27.50
6/30/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/6/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/8/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/9/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/12/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/13/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re ruling on preliminary approval	0.10	\$275.00	\$27.50
7/14/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/15/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/16/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
7/29/2021	Sean Barry	Researched status of ruling on preliminary approval	0.10	\$275.00	\$27.50
8/4/2021	Sean Barry	Researched status of ruling on preliminary approval	0.10	\$275.00	\$27.50
8/6/2021	Sean Barry	Researched status of ruling on preliminary approval	0.20	\$275.00	\$55.00
8/10/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re preliminary approval	0.10	\$275.00	\$27.50

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KB DETAILED REPORT

8/10/2021	Kristin Kemnitzer	memo re standing issues; conf with attys re status of prelim approval; memo re ramirez; multiple confs with attys re same	2.70	\$650.00	\$1,755.00
8/11/2021	Kristin Kemnitzer	mulitple correspondence re potential remand	0.60	\$650.00	\$390.00
8/11/2021	Sean Barry	Reviewed emails (3) from co-counsel re preliminary approval; reviewed emails (2) from Kristin Kemnitzer re preliminary approval	0.20	\$275.00	\$55.00
8/12/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re preliminary approval	0.10	\$275.00	\$27.50
8/12/2021	Kristin Kemnitzer	research re CAFA jurisdictional issues; multiple confs with attys re same; memo re remand issues	2.30	\$650.00	\$1,495.00
8/13/2021	Kristin Kemnitzer	continue to research CAFA jdx, standing, and remand	0.60	\$650.00	\$390.00
8/18/2021	Sean Barry	Reviewed email from co-counsel re preliminary approval motion	0.10	\$275.00	\$27.50
8/25/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
8/27/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
8/30/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
8/31/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/1/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/2/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/3/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/7/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/8/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/9/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/10/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/13/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/14/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/15/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/16/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/17/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50

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KB DETAILED REPORT

9/20/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/21/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/22/2021	Sean Barry	Reviewed email from co-counsel re preliminary approval order	0.10	\$275.00	\$27.50
9/23/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re preliminary approval	0.10	\$275.00	\$27.50
9/24/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/27/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
9/29/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/6/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/8/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/12/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/13/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/15/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/19/2021	Sean Barry	Researched ruling on preliminary approval	0.10	\$275.00	\$27.50
10/20/2021	Kristin Kemnitzer	Review minute order; revise prelim approval order; conf with counsel re same	1.20	\$650.00	\$780.00
10/20/2021	Sean Barry	Reviewed email from Court re pleading; reviewed Order; reviewed email from Kristin Kemnitzer re revised Proposed Order; drafted revised Proposed Order; researched and marked exhibits; email to Kristin Kemnitzer re revised Proposed Order	1.10	\$275.00	\$302.50
10/21/2021	Kristin Kemnitzer	finalize revised prelim approval order; send to opposing ocunsl	0.40	\$650.00	\$260.00
10/21/2021	Sean Barry	Reviewed emails (2) from Kristin Kemnitzer re revised proposed order	0.10	\$275.00	\$27.50
10/22/2021	Sean Barry	Reviewed email from co-counsel re revised proposed order	0.10	\$275.00	\$27.50
10/25/2021	Sean Barry	Telephone call from Kristin Kemnitzer re revised proposed order	0.10	\$275.00	\$27.50
10/25/2021	Kristin Kemnitzer	review and edit prelim approval order; conf with cocounsel and opposing counsel re same	0.40	\$650.00	\$260.00
10/26/2021	Sean Barry	Reviewed emails (2) from Kristin Kemnitzer re revised proposed order	0.10	\$275.00	\$27.50

GROUPED BY Activity Item

KB DETAILED REPORT

10/27/2021	Sean Barry	Reviewed emails (2) from opposing counsel re revised proposed order; reviewed emails (4) from Kristin Kemnitzer re revised proposed order; reviewed emails (2) from co-counsel re revised proposed order; email to Kristin Kemnitzer re revised proposed order; reviewed and edited revised proposed order, researched, compiled and renumbered revised exhibits; emails (2) to Court re revised proposed order; email from Court re revised proposed order	1.10	\$275.00	\$302.50
10/27/2021	Kristin Kemnitzer	file prelim approval	0.30	\$650.00	\$195.00
10/28/2021	Sean Barry	Prepared chambers copy of revised proposed order; drafted letter to Court re revised proposed order	0.20	\$275.00	\$55.00
10/29/2021	Sean Barry	Reviewed emails (4) from Kristin Kemnitzer re revised proposed order; reviewed emails (2) from co-counsel re revised proposed order; reviewed email from Court re pleading; reviewed preliminary approval Order; email to class administrator re preliminary approval Order; email to Kristin Kemnitzer, co-counsel re preliminary approval order, fee motion	0.60	\$275.00	\$165.00
10/29/2021	Kristin Kemnitzer	Review prelim approval order	0.50	\$650.00	\$325.00
11/1/2021	Sean Barry	Telephone call from Kristin Kemnitzer re preliminary approval	0.10	\$275.00	\$27.50
11/2/2021	Sean Barry	Reviewed email from Kristin Kemnitzer re preliminary approval	0.10	\$275.00	\$27.50
11/5/2021	Kristin Kemnitzer	confs with class administrator, counsel, and update to clients re prelim approval	0.60	\$650.00	\$390.00
11/11/2021	Kristin Kemnitzer	draft declaration for motion for attorneys' fees	0.90	\$650.00	\$585.00
11/12/2021	Kristin Kemnitzer	prepare declaration	0.20	\$650.00	\$130.00
11/15/2021	Kristin Kemnitzer	review and audit time entries using billing judgment; draft KBK declaration	2.00	\$650.00	\$1,300.00
11/16/2021	Kristin Kemnitzer	Finalize declaration; conf with staff re same; conf with co counsel re fee motion; conf with co counsel re auditing of fees; draft client decls	1.10	\$650.00	\$715.00
11/17/2021	Kristin Kemnitzer	review and audit all timeslips from case	1.50	\$650.00	\$975.00
11/18/2021	Kristin Kemnitzer	perform audit of time records; update time records accordingly; update declaration with billing categories	1.30	\$650.00	\$845.00
11/18/2021	Sean Barry	Researched fee motion	0.10	\$275.00	\$27.50
11/19/2021	Kristin Kemnitzer	review and finalize declaration; finalize fees	0.60	\$650.00	\$390.00
L200: TOTAL:			349.90		\$228,752.50

GROUPED BY Activity Item

KB DETAILED REPORT

L300: - Discovery

3/27/2017	Bryan Kemnitzer	Discuss case with attorney regarding Nationstar case and issues regarding PMK depositions.	0.80	\$850.00	\$680.00
7/19/2017	Kristin Kemnitzer	Review draft 26(f) production; review folder for all documents to be produced; conf with co counsel re same; conf with staff re production	1.40	\$650.00	\$910.00
7/20/2017	Kristin Kemnitzer	draft PO, 26(f) disclosures; joint CMC statement; PO; conf with staff re 26(f) disclosures; conf with AL re same	3.50	\$650.00	\$2,275.00
7/21/2017	Kristin Kemnitzer	Conf with AL re draft PO, joint statement, doc production; review doc production for redaction and confidentiality; re-do PO; emails with staff re same; emails with opposing counsel re PO and joint statement	2.00	\$650.00	\$1,300.00
7/26/2017	Sean Barry	Reviewed and edited disclosures, drafted Proof of Service	0.40	\$275.00	\$110.00
7/20/2018	Kristin Kemnitzer	begin discovery	0.80	\$650.00	\$520.00
7/23/2018	Kristin Kemnitzer	draft discovery requests	1.60	\$650.00	\$1,040.00
7/25/2018	Kristin Kemnitzer	Draft requests for production of documents and special rogs; read complaint; research 580b	3.80	\$650.00	\$2,470.00
7/26/2018	Kristin Kemnitzer	review discovery; conf with AL re discovery	0.70	\$650.00	\$455.00
7/27/2018	Kristin Kemnitzer	review emails to and from clients	0.30	\$650.00	\$195.00
7/31/2018	Kristin Kemnitzer	conf re discovery	0.20	\$650.00	\$130.00
8/1/2018	Kristin Kemnitzer	re-draft discovery	1.00	\$650.00	\$650.00
8/2/2018	Kristin Kemnitzer	redraft/edit requests for production of documetns	1.70	\$650.00	\$1,105.00
8/3/2018	Kristin Kemnitzer	Draft/edit RPOD; conf with counsel re same	1.10	\$650.00	\$715.00
8/10/2018	Kristin Kemnitzer	Re-edit doc requests and special rogs; conf with co counsel re same	2.10	\$650.00	\$1,365.00
8/13/2018	Kristin Kemnitzer	Review doc production; conf with AL re RPOD and Special Rogs	0.30	\$650.00	\$195.00
8/14/2018	Kristin Kemnitzer	Review final edits to discovery	0.50	\$650.00	\$325.00
8/15/2018	Kristin Kemnitzer	Edit special rogs; conf with co counsel re same	1.00	\$650.00	\$650.00
10/5/2018	Kristin Kemnitzer	Review correspondence re discovery; conf with co counsel re same; conf with opposing counsel re discovery extension	0.50	\$650.00	\$325.00
10/8/2018	Kristin Kemnitzer	edit and revise joint CMC statement	0.30	\$650.00	\$195.00
10/11/2018	Kristin Kemnitzer	Conf re CMC	0.20	\$650.00	\$130.00
10/29/2018	Kristin Kemnitzer	emails re discovery extension	0.30	\$650.00	\$195.00
11/12/2018	Kristin Kemnitzer	follow up re discovery; conf with atty re same	0.30	\$650.00	\$195.00
11/15/2018	Kristin Kemnitzer	Review discovery responses; conf with AL re discovery and	2.40	\$650.00	\$1,560.00
11/19/2018	Kristin Kemnitzer	Conf with co counsel re Nationstar's discoveryr repsonses; review responses and notes; follow up with opposing counsel re M&C	0.90	\$650.00	\$585.00

GROUPED BY Activity Item

KB DETAILED REPORT

11/27/2018	Kristin Kemnitzer	emails re M&C; review newly produced discovery	0.50	\$650.00	\$325.00
11/28/2018	Kristin Kemnitzer	review discovery responses; review newly produced discovery; conf with co counsel; M&C call; follow up post call	3.10	\$650.00	\$2,015.00
12/3/2018	Kristin Kemnitzer	Conf with staff re discovery responses; being prepping discovery responses	1.00	\$650.00	\$650.00
12/5/2018	Kristin Kemnitzer	conf re discovery review; conf re discovery responses; conf with	0.40	\$650.00	\$260.00
12/10/2018	Kristin Kemnitzer	prepare responses to discovery	0.20	\$650.00	\$130.00
12/11/2018	Kristin Kemnitzer	review discovery analysis; conf with staff re same and preparing analysis;	0.40	\$650.00	\$260.00
12/13/2018	Kristin Kemnitzer	Conf re discovery	0.20	\$650.00	\$130.00
12/17/2018	Kristin Kemnitzer	Review Nationstar's policies and procedures produced in discovery; conf with atty re review and M&C call; draft discovery responses	1.70	\$650.00	\$1,105.00
12/18/2018	Kristin Kemnitzer	Review Nationstar's doc review in advance of meet and confer; prepare memo re same; conf with AL re discovery	5.10	\$650.00	\$3,315.00
12/20/2018	Kristin Kemnitzer	emails re discovery	0.20	\$650.00	\$130.00
12/21/2018	Kristin Kemnitzer	Review discovery requests and draft responses; conf with co counsel re same; conf with clients re responses	1.50	\$650.00	\$975.00
1/4/2019	Kristin Kemnitzer	emails re discovery	0.30	\$650.00	\$195.00
1/8/2019	Kristin Kemnitzer	Draft responses to discovery; conf with client re responses	4.00	\$650.00	\$2,600.00
1/9/2019	Kristin Kemnitzer	review all post-spokeo briefing; conf with clients re: docs; draft response to special rogs; read all Donato spokeo cases	2.50	\$650.00	\$1,625.00
1/14/2019	Kristin Kemnitzer	Prep for M&C with opposing counsel; attend M&C; follow up post M&C	1.10	\$650.00	\$715.00
1/15/2019	Kristin Kemnitzer	emails re M&C; emails with atty re discovery; emails with clients re dates	0.40	\$650.00	\$260.00
1/17/2019	Kristin Kemnitzer	Review and edit discovery responses; conf with AL re same	0.90	\$650.00	\$585.00
1/18/2019	Kristin Kemnitzer	Conf with co counsel re responses; emails to clients re same; amend responses	0.70	\$650.00	\$455.00
1/22/2019	Sean Barry	Researched and numbered document production; reviewed and edited discovery responses; drafted Proof of Service	0.90	\$275.00	\$247.50
1/22/2019	Kristin Kemnitzer	Emails/calls with clients and staff re discovery responses; prep responses	0.60	\$650.00	\$390.00
2/4/2019	Kristin Kemnitzer	Review supplemental production; conf with staff re same	0.20	\$650.00	\$130.00
2/5/2019	Kristin Kemnitzer	conf with atty re supplemental discovery responses; review email re M&C	0.30	\$650.00	\$195.00
2/8/2019	Kristin Kemnitzer	Review new discovery responses; conf with staff re same	0.50	\$650.00	\$325.00
2/11/2019	Kristin Kemnitzer	Review discovery; conf with co counsel	0.50	\$650.00	\$325.00
2/15/2019	Kristin Kemnitzer	emails re M&C	0.20	\$650.00	\$130.00

GROUPED BY Activity Item

KB DETAILED REPORT

2/19/2019	Kristin Kemnitzer	Review discovery responses; conf with co counsel re same	0.50	\$650.00	\$325.00
2/20/2019	Kristin Kemnitzer	Review discovery responses; conf with AL; M&C; draft opposing counsel M&C letter	1.50	\$650.00	\$975.00
2/21/2019	Kristin Kemnitzer	Draft M&C letter; review all previous discovery responses and M&C letters	2.00	\$650.00	\$1,300.00
2/22/2019	Kristin Kemnitzer	review and edit M&C letter; review discovery responses; conf with co counsel re same;	1.30	\$650.00	\$845.00
2/25/2019	Kristin Kemnitzer	Review and edit M&C; send M&C	0.50	\$650.00	\$325.00
2/28/2019	Kristin Kemnitzer	Prep for M&C; conf with co counsel re same	0.40	\$650.00	\$260.00
3/1/2019	Kristin Kemnitzer	prep for CMC; attend CMC	1.50	\$650.00	\$975.00
3/4/2019	Kristin Kemnitzer	Review past mortgage discovery for 30(b)(6) witnesses; draft depo notice; review judge Donato's standing orders; conf with co counsel re same; review letter to judge	2.20	\$650.00	\$1,430.00
3/26/2019	Kristin Kemnitzer	Review minute order; conf with staff re court call	0.20	\$650.00	\$130.00
4/8/2019	Kristin Kemnitzer	Review newly produced docs; conf with co counsel re discovery call	0.30	\$650.00	\$195.00
4/9/2019	Kristin Kemnitzer	Prep for discovery call; attend discovery call; debrief call	0.80	\$650.00	\$520.00
4/10/2019	Kristin Kemnitzer	Review proposals; review minute order; conf with co counsel re same	0.30	\$650.00	\$195.00
4/11/2019	Kristin Kemnitzer	travel to and from in person M&C; prep for M&C; attend M&C; debrief M&C	2.60	\$650.00	\$1,690.00
4/12/2019	Kristin Kemnitzer	follow up re M&C	0.10	\$650.00	\$65.00
4/30/2019	Kristin Kemnitzer	Conf re potential expert; contact potential expert	0.30	\$650.00	\$195.00
5/2/2019	Kristin Kemnitzer	conf with potential expert and co counsel re services; call potential expert	0.50	\$650.00	\$325.00
5/21/2019	Kristin Kemnitzer	emails re discovery dispute; call potential expert; follow up email	0.30	\$650.00	\$195.00
6/19/2019	Kristin Kemnitzer	Review atty's notes on NS production	0.40	\$650.00	\$260.00
7/17/2019	Kristin Kemnitzer	Depo prep with class reps	3.10	\$650.00	\$2,015.00
8/8/2019	Kristin Kemnitzer	emails re additional docs from Ps	0.20	\$650.00	\$130.00
8/26/2019	Kristin Kemnitzer	Review emails re data issues and supplemental discovery	0.20	\$650.00	\$130.00
8/27/2019	Kristin Kemnitzer	Conf re status update	0.20	\$650.00	\$130.00
8/28/2019	Kristin Kemnitzer	Review emails re M&C and discovery; conf with AL re same	0.50	\$650.00	\$325.00
8/30/2019	Kristin Kemnitzer	Review supplemental discovery responses; conf with counsel re same	0.50	\$650.00	\$325.00
9/2/2019	Kristin Kemnitzer	emails with cocounsel re M&C	0.30	\$650.00	\$195.00
9/3/2019	Kristin Kemnitzer	Review email re M&C; Review defendants' supplemental doc production; review M&C letter; conf with co-counsel re same	1.00	\$650.00	\$650.00
9/4/2019	Kristin Kemnitzer	Review depo transcripts	0.20	\$650.00	\$130.00

GROUPED BY Activity Item

KB DETAILED REPORT

9/5/2019	Kristin Kemnitzer	Review and edit request for conference; conf with co counsel re same	0.40	\$650.00	\$260.00
9/6/2019	Kristin Kemnitzer	Emails re discovery disputes; begin reviewing expert reports; prep	1.00	\$650.00	\$650.00
9/9/2019	Kristin Kemnitzer	Read deop transcripts; conf re expert report; review expert report	4.50	\$650.00	\$2,925.00
9/10/2019	Kristin Kemnitzer	Review expert report; conf with atty re same; review standing orders for expert disclosures and daubert motion; emails re mediation; review	2.10	\$650.00	\$1,365.00
9/11/2019	Kristin Kemnitzer	review emails and minute order; conf with attys re same; prep for expert meeting; expert meeting; review case law re UCL standing; review expert report	1.70	\$650.00	\$1,105.00
9/12/2019	Kristin Kemnitzer	Review depo transcripts; review and edit expert report; conf with co counsel re same	2.10	\$650.00	\$1,365.00
9/15/2019	Kristin Kemnitzer	review expert reports; conf with expert re same; conf with counsel	1.10	\$650.00	\$715.00
9/16/2019	Kristin Kemnitzer	Review expert reports; conf with attys re experts; conf with co counsel re same	1.80	\$650.00	\$1,170.00
9/17/2019	Kristin Kemnitzer	Prepare expert report rebuttal; conf with expert and co-counsel re same; follow up memos re expert reports	2.00	\$650.00	\$1,300.00
9/21/2019	Kristin Kemnitzer	correspondence re expert report	0.60	\$650.00	\$390.00
9/30/2019	Kristin Kemnitzer	Conf re expert report and deops; review and edit expert rebuttal report; conf with co-counsel re same	2.80	\$650.00	\$1,820.00
10/1/2019	Kristin Kemnitzer	emails re expert depo dates	0.20	\$650.00	\$130.00
10/3/2019	Kristin Kemnitzer	Review expert report	0.20	\$650.00	\$130.00
10/4/2019	Sean Barry	Drafted expert disclosure	0.40	\$275.00	\$110.00
10/15/2019	Sean Barry	Drafted subpoena objections; redrafted objections per greatly expanded co-counsel specifications	1.30	\$275.00	\$357.50
10/15/2019	Kristin Kemnitzer	review and conf re depo objections	0.30	\$650.00	\$195.00
10/16/2019	Kristin Kemnitzer	Research expert objections; conf with atty re same	0.70	\$650.00	\$455.00
10/17/2019	Kristin Kemnitzer	draft and edit opposition to depo notice; conf with co counsel re same	1.70	\$650.00	\$1,105.00
10/21/2019	Kristin Kemnitzer	confs re depo objections; review Ulzheimer depo transcript	0.80	\$650.00	\$520.00
10/22/2019	Sean Barry	Edited subpoena objections; drafted Proof of Service	0.30	\$275.00	\$82.50
10/22/2019	Kristin Kemnitzer	Prep for call with expert; call with expert; finalize depo objections; conf with staff re same	1.90	\$650.00	\$1,235.00
10/23/2019	Kristin Kemnitzer	prep for depo	0.30	\$650.00	\$195.00
10/24/2019	Kristin Kemnitzer	Prep for deposition; attend deposition; debrief deposition	7.30	\$650.00	\$4,745.00
11/10/2019	Kristin Kemnitzer	conf re depo	0.30	\$650.00	\$195.00

GROUPED BY Activity Item

KB DETAILED REPORT

11/16/2019	Kristin Kemnitzer	conf re expert re depo	0.20	\$650.00	\$130.00
11/20/2019	Kristin Kemnitzer	emails re data and expert; review and edit mediation letter	0.70	\$650.00	\$455.00
4/21/2020	Bryan Kemnitzer	long call with atty for Nationstar re status of case and issues re court class cert motion and issues re settlement draft email to atty discussing case with KK and with AL associate re settlement conference	2.50	\$850.00	\$2,125.00
4/22/2020	Bryan Kemnitzer	email to AL discussing case with KK email to Mark L re status of offer and demand	1.00	\$850.00	\$850.00
5/18/2020	Bryan Kemnitzer	emails re issues in case call to KK and email to KK re case and settlement issues	0.20	\$850.00	\$170.00
5/28/2020	Bryan Kemnitzer	discussing case with KK re settlement and class matrix and issues re two classes and language memo	0.80	\$850.00	\$680.00
L300: TOTAL:			118.60		\$76,912.50

EXPENSES

DATE	DESCRIPTION	UNITS	AMOUNT
2/14/2020	Food for Feb. 14, 2020 hearing.	1.00	\$16.48
8/16/2019	Expense for One Legal filing fee	1.00	\$49.95
11/20/2017	Filing Fees One Legal: Invoice No.: 11120060	1.00	\$62.20
8/28/2019	Expense reimbursement to Kristin Kemnitzer for Toland discovery conf/depo prep	1.00	\$103.78
12/28/2017	Filing Fees One Legal Invoice No.: 11137088	1.00	\$49.95
5/21/2021	FedEx - 7-379-05089 Document sent to court	1.00	\$23.20
10/28/2021	Federal Express - to court	1.00	\$24.06
1/29/2019	9070 - Case Costs: Case Research Costs Westlaw January 2019.	1.00	\$35.00
7/20/2017	Legal Research: Westlaw Thompson Reuters June 2017.	1.00	\$77.69
6/28/2017	Filing Fees Invoice No.: 10920361 Check No.: 10141	1.00	\$49.95
12/13/2017	Filing Fees One Legal Invoice No.: 11137088	1.00	\$49.95
9/18/2017	Filing Fees: One Legal Invoice No.: 11056481	1.00	\$61.20
2/8/2021	FedEx Inv. #7-275-37150 shipment to US District Court.	1.00	\$22.87
7/17/2020	FedEx inv.#7-075-51969: ship court documents.	1.00	\$24.55
2/14/2020	Parking charges for Feb. 14, 2020 hearing.	1.00	\$38.00
8/27/2018	9065 - Case Costs: Postage & Delivery Invoice No.; 6-278-86288	1.00	\$33.57
8/28/2019	Barkley Court Report expense for Deposition of Andrew Joseph Lol	1.00	\$1,577.10
10/26/2018	99065 - Case Costs: Postage & Delivery Godspeed courier Acct- Invoice No.: 789-861	1.00	\$14.50
2/14/2020	Toll for Feb. 14, 2020 hearing.	1.00	\$6.00
8/28/2019	Esquire Deposition Solutions LLC expense	1.00	\$1,426.70

GROUPED BY Activity Item

KB DETAILED REPORT

8/16/2019	Expense for One Legal filing fee	1.00	\$49.95
10/21/2019	Expense for expert report from Privacy Times, Inc.	1.00	\$5,000.00
3/29/2018	Consultant Fees Invoice No.: Nancy Barron Ck No.: 10642	1.00	\$4,950.00
8/10/2017	Document Transportation/Delivery: GodSpeed Courier Invoice No.: 789-462 8/5/2017 for 7/27/2017	1.00	\$15.00
2/14/2020	Taxi fare for Feb. 14, 2020 hearing.	1.00	\$14.39
8/28/2019	Barkley Court Report expense for Deposition of Phillip Livingston	1.00	\$1,862.70
9/29/2017	Filing Fees: One Legal Invoice No.: 11072766	1.00	\$49.95
6/27/2019	CourtCall expense 4-9-19	1.00	\$30.00
11/13/2019	Esquire Deposition Solutions INV1597656 for transcript of deponent Evan Hendrick.	1.00	\$1,047.70
4/13/2018	9020 - Case Costs: Fax & File Charges One Legal Invoice No.: 11273430	1.00	\$49.95
8/27/2018	9065 - Case Costs: Postage & Delivery Invoice No.; 6-278-86288	1.00	\$32.58
4/2/2018	9020 - Case Costs: Fax & File Charges One Legal Invoice No.: 11261030	1.00	\$49.95
2/5/2021	FedEx Inv.#7-268-62919	1.00	\$22.87
2/14/2020	Mileage charge for Feb. 14, 2020 hearing.	1.00	\$44.64
7/6/2017	Matt Anderson Personal Service for: Veripro served on 4-4-2017 \$ 75.00 Nationstar served on 4-4-2017 \$ 75.00	1.00	\$150.00
7/3/2018	9005 - Case costs: Court Call 11/21/17 Judge Brad Seligman Alameda County Superior Court - Oakland.	1.00	\$86.00
2/14/2020	Plane ticket for Feb. 14, 2020 hearing.	1.00	\$559.96
Toland, Taquelia & Georgia TOTAL:		749.00	\$457,287.34
GRAND SERVICES TOTAL:		712.00	439,525.00
GRAND EXPENSES TOTAL:		37.00	17,762.34
GRAND TOTAL:		749.00	\$457,287.34

EXHIBIT C

- *Aguilar, Canton, Owens and Eaton v. Citizens Automobile Finance, Inc.: RBS Citizens, N.A.*, Civil No.: C 10-05345JSW (Northern District of California)
- *AIS Services v. Navarrette*, Sacramento County Superior Court Case No. 34-2008-00020740
- *Ally Financial, Inc. v. Lazrovich, et al.*, Civil No. 111CV195659 (Santa Clara Superior Court)
- *Alta Vista Credit Union v. Campbell, et al., and Related Cross Action*, Case No.: CIVDS1009450 (San Bernardino County Superior Court)
- *Arguelles-Romero, et al. v. Americredit Financial Services, Inc.*, Civil No. BC410509 (Los Angeles Superior Court)
- *Asabi v. A-L FINANCIAL Consumer USA Inc. dba Drive Financial Services*, Civil No. RG09443628 (Alameda Superior Court)
- *Autovest LLC v. Mabrey*, Case No. CGC-18-566617 (San Francisco Superior Court)
- *Baker v. GEMB, Inc. et al.* Civil No. C10-05261SBA (United States District Court for the Northern District of California)
- *Bank of Stockton v. Tolentino, et al.*, Civil No. CV 160904 (Santa Cruz Superior Court)
- *Bryan v. Franklin Capital Corp.*, Civil No. BC 340574 (Los Angeles Superior Court)
- *Buckingham v. Automotive Funding Group, et al.*, Case No. BC492394 (Los Angeles Superior Court)
- *Buzenes v. Nuwell National Auto Finance LLC*, Los Angeles Superior Court Case No. BC407366
- *Campf v. Golden 1 Credit Union*, Sacramento County Superior Court, Case No. 34-2018-00228285.
- *California Community Credit Union v. Chapman*, Sacramento County Superior Court Case No. 34-2009-00054626
- *Cooperrider v. First Metropolitan Credit Union*, Civil No. BC321978 (Alameda County Superior Court)
- *Cordero v. American Honda Finance Corporation* Civil No. 531470 (San Mateo County Superior Court)
- *Dadian v. Westlake Services, Inc.*, Civil No. BC322765 (Los Angeles Superior Court)
- *DaimlerChrysler Financial Services Americas LLC v. Pryer, et al.*, Civil No. RIC 470466 (Riverside Superior Court)

- *Davis v. Volvo Finance North America*, Civil No. 03AS00938 (Sacramento Superior Court)
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