#### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

	)	CASE NO. 1:12-CV-00851
In re: Fifth Third Early Access Cash Advance	)	
Litigation	)	HON. MICHAEL R. BARRETT
_	)	
	)	
	)	

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND INCENTIVE AWARDS

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#### INTRODUCTION

As Plaintiffs and the Class succeeded in attaining judgment against Defendant Fifth Third Bank for two violations of the Truth in Lending Act, Plaintiffs and the Class are entitled to attorney's fees and costs. This is a case that has been litigated for over ten years with both sides contesting liability vigorously. During that entire time, the parties litigated the TILA claim and breach of contract claim together, as both sides (and the Sixth Circuit) repeatedly acknowledged they are directly related to one another.

Under such circumstances, the law establishes that Plaintiffs are entitled to all fees directly attributable to the TILA claim and all fees that cannot reasonably be extricated from work done regarding the breach of contract cause of action. Hence, Plaintiffs are not seeking any fees related to work that only supported the breach of contract claim. Such excised time includes all work relating to Plaintiffs' successful appeal of their breach of contract claim, all trial and trial preparation work after the Court granted summary judgment for Plaintiffs on their TILA claim, and all post-trial work related to the breach of contract verdict. The support for these hours is provided in great detail in the accompanying declaration of Class Counsel and the exhibits attached thereto.

Using those hours that cannot be attributed to the breach of contract claim, Plaintiffs calculated their lodestar based on hourly rates that courts across this country—including in this District—have found to be reasonable for Class Counsel and other lawyers engaged in complex litigation. These rates are below the rates of the defense firm that tried the case for Fifth Third (Williams and Connolly) and the rates of the defense firms where some of the Class Counsel practiced previously, including Gibson Dunn & Crutcher LLP, Jones Day, and Covington & Burling. Using these hourly rates, Plaintiffs' lodestar amounts to \$5,638,922.53, which is the sum of Class Counsel's

lodestar of \$5,008,149.03<sup>1</sup> and the lodestar for other firms for whom attorneys' fees are being sought, \$630,773.50. The Court should award that amount in fees to Plaintiffs for their counsel's outstanding work in this heavily contested litigation that has lasted over ten years—so far.

In addition, Class Counsel scoured the costs and expenses in this case and eliminated all expert expenses, all meal expenses, and any expenses that were not properly attributable to the TILA claims. The costs remaining amount to \$315,572.13, and the Court should award that amount to compensate Plaintiffs for their out-of-pocket expenses incurred in this longstanding litigation.

In addition, Class Counsel requests that Plaintiffs/Class Representatives Adam McKinney, Brian Harrison, Lori Laskaris, Daniel Laskaris, and Janet Fyock, each receive a reasonable service award of \$10,000. Such an award comports with prior practice of this Court and is appropriate, given the efforts Plaintiffs have undertaken to prosecute this action.

And finally, Plaintiffs request that the Court order Defendant to bear the costs of notifying the Class of Judgment, notifying the Class of any award of attorney's fees, costs, and incentive awards, and distributing the funds to the Class.

#### FACTUAL AND LEGAL BACKGROUND

On March 29, 2023, this Court granted summary judgment in favor of Plaintiffs and the Class on their Truth in Lending Act claim, finding that Fifth Third committed two TILA violations. ECF No. 209 PAGEID #: 6057-60. On December 1, 2023, the Court entered a final judgment on Plaintiffs' TILA claim. ECF No. 302. Under such circumstances, TILA requires the Court to award Plaintiffs their costs and reasonable attorneys' fees pursuant to 15 U.S.C. § 1640(a).

<sup>&</sup>lt;sup>1</sup>This time reflects additional hours incurred following Class Counsel's last pull of time records, which relates to, among other things, Plaintiffs' Supplemental Declaration, ECF No. 297, Fifth Third's Motion to Strike, ECF No. 298, and the related status conference with the Court, as well as some hours from Tycko & Zavareei that were inadvertently excluded from Plaintiffs' Supplemental Declaration due to a clerical error.

Fed. R. Civ. P. 23(h) specifically provides that in a certified class action, as here, any claim for an award must be made by motion under Fed. R. Civ. P. 54(d)(2) "at a time the court sets." In this case, the Court ordered Plaintiffs to file their motion for attorney's fees on December 22, 2023. *See* December 11, 2023 Minute Order Docket Entry. Although this case included multiple claims, including a breach of contract claim that went to trial, Class Counsel only seeks recovery of fees and expenses related to the TILA claim.

Class Counsel has litigated the case vigorously, as has Fifth Third. The first Complaint was filed in this case over ten years ago, on August 3, 2012. ECF No. 1 PAGEID #: 1-58. And it was the first of its kind involving the type of payday loan advance product implemented by Fifth Third, which was one of four banks who rolled out similar products. Declaration of Class Counsel ("Class Counsel Dec.") at 10(a). Accordingly, significant factual and legal research was required in the complaint-drafting stage. *Id.* Thereafter, other complaints were filed around the country, which led to consolidation and this Court's appointment of undersigned counsel as Interim Co-Lead Class Counsel. Class Counsel Dec. at 10(a).

Following this appointment, Class Counsel worked to draft an amended consolidated complaint, interview and narrow the named Plaintiffs, and establish a billing protocol. *Id.* Plaintiffs' counsel also successfully defeated a motion to dismiss as to Plaintiffs' TILA claim. *Id.* The parties then engaged in settlement efforts, which were ultimately unsuccessful. *Id.* at 10(b). None of this work is segregable and thus has been properly requested as part of Class Counsel's reasonable lodestar for obtaining summary judgment on Plaintiffs' TILA claim. By contrast, reimbursement for work relating to Plaintiffs' motion for reconsideration of the Court's order dismissing all non-TILA claims and thereafter request for entry of judgment is not sought herein, nor is work related to Plaintiffs' successful appeal of the Court's dismissal of their breach of contract claim.

Next, the parties engaged in discovery, which included discovery requests, document review, numerous depositions, and expert work—all of which involved extensive meeting and conferring with defense counsel. *Id.* at ¶ 10(c). In addition to the motion to dismiss, Class Counsel also litigated many motions involving the TILA claim, both offensive and defensive. *Id.* at ¶ 10(d). With respect to discovery and motion practice, Class Counsel has used their best efforts to exclude any time attributable solely to Plaintiffs' breach of contract claim, such as research on Fifth Third's voluntary payor defense and briefing of Plaintiffs' summary judgment motion on notice, neither of which could have impacted the Class's recovery on TILA. Class Counsel Dec. at ¶ 10(d).

Following certification by this Court, Class Counsel thereafter worked to prepare a notice plan and provide notice to the Class. *Id.* at ¶ 10(e). And prior to the Court's grant of summary judgment on the TILA claim, Class Counsel made substantial efforts to prepare for trial, including identifying exhibits, preparing witness outlines, and drafting motions *in limine* and jury instructions on the TILA claim, amongst other activities. *Id.* at ¶ 10(f). Throughout the time preceding summary judgment on the TILA claim, Class Counsel also attended numerous hearings and conferences with the Court, both in person and remotely. *Id.* at ¶ 10(g). And now, Class Counsel is engaged in the post-judgment work of pursuing this motion and overseeing the administration of the judgment proceeds to the Class, as well as potentially litigating an appeal on the TILA claim. *Id.* at ¶ 11.

To account for the time spent litigating the TILA claim, Class Counsel has taken their hours and applied the LSI Adjusted Laffey Matrix. *Id.* at \$\bigset\$ 5. Applying those rates, Class Counsel has incurred fees of \$5,008,149.03. *Id.* at \$\bigset\$ 4. Prior to the appointment of Class Counsel, the other firms for whom attorneys' fees are being sought incurred fees of \$630,773.50.2 In addition to the time Plaintiffs have spent litigating this case, Plaintiffs have made significant financial investment to pursue this action.

<sup>&</sup>lt;sup>2</sup> The reasonable hourly rates for other firms for whom attorneys' fees are being sought are supported by separate declarations filed herewith at Exhibits 11 - 13.

This has resulted in expenses of \$315,572.13. *Id.* at ₱12. In combining the attorney's fees and expenses from all firms, Class Counsel seek \$5,954,494.66.

And just as Plaintiffs' Counsel underwent significant work to pursue this lawsuit, so did Plaintiffs. The Class Representatives all worked with counsel to investigate the case prior to filing suit. They also worked with Class Counsel to respond to discovery requests. They prepared for and attended depositions in the case. And finally, they remained in contact with Class Counsel through the pendency of the action.<sup>3</sup> In pursuing this lawsuit, Plaintiffs exposed themselves to publicity by filing suit for a low monetary recovery in the hope of helping others. Class Counsel Dec. at **PP** 20-21.

#### **ARGUMENT**

TILA requires the Court to award Plaintiffs their costs and reasonable attorneys' fees pursuant to 15 U.S.C. § 1640(a).

#### A. Class Counsel's requested fees and costs are reasonable.

"Attorney's fees for successful litigants under federal fee shifting statutes are commonly calculated using the 'lodestar' method[.]" *Derry v. Buffaloe & Associates, PLC*, No. 2:12-cv-303, 2014 WL 4450146 at \*2 (E.D. Tenn. Sep. 10, 2014). The lodestar amount is calculated by multiplying the number of hours reasonably expended on the litigation by a reasonable hourly rate." *Imwalle v. Reliance Med. Prods. Inc.*, 515 F.3d 531, 551–52 (6th Cir. 2008) (citing *Hensley*, 461 U.S. at 433).

Plaintiffs' requested fees of \$5,638,922.53 are properly based on the Adjusted Laffey matrix for Class Counsel's reasonable hourly rates and exclude any hours that are segregable and solely attributable to Plaintiffs' breach of contract claim.

Class Counsel has also identified the permissible costs that it has borne in this action related to the TILA claim, all of which a firm would normally charge to a fee-paying client and thus should

<sup>&</sup>lt;sup>3</sup> Following judgment on the TILA claim, the Class Representatives also prepared for and testified at trial on the breach of contract claim.

also be awarded. *Tyson v. Sterling Rental, Inc.*, No. 13-CV-13490, 2019 WL 3554713, at \*7 (E.D. Mich. Apr. 17, 2019), report and recommendation adopted sub nom. Tyson v. Sterling Car Rental, Inc., 2019 WL 3024719 (E.D. Mich. July 11, 2019). These total \$315,572.13. See Class Counsel Dec. at ₱ 16. Plaintiffs have excluded from these amounts all meal costs, including the coffee costs that Fifth Third previously objected to, notwithstanding that those are properly compensable. See, e.g., Lankford v. Reladyne, LLC, No. 1:14-CV-682, 2016 WL 3640691, at \*4 (S.D. Ohio June 29, 2016). Plaintiffs have also excluded any fees paid to expert witnesses.

## 1. The Adjusted Laffey Matrix provides appropriate rates for Class Counsel's work.

Plaintiffs respectfully submit that the Adjusted Laffey matrix provides the best and most reasonable hourly rate for Class Counsel in this case given the national market for class action attorneys, the specialized experience required, and the reflection of both in the hourly rates of opposing counsel hired by Fifth Third in this case, as well as those awarded to Class Counsel in this District and other similar cases.

Courts throughout the country, including in Ohio and this District, have used the Adjusted Laffey rates when awarding fees in class action cases, including to Class Counsel in particular. Indeed, a court in this District awarded Tycko & Zavareei LLP and Spangenberg, Shibley, and Liber LLP attorney's fees using Adjusted Laffey rates for purposes of a lodestar cross-check in another class action case against Fifth Third Bank. *See Smith v. Fifth Third Bank*, No. 1:18-cv-00464-DRC-SKB, Doc. 130 (S.D. Ohio Aug. 31, 2021). The Northern District of Ohio has also expressly approved of using Adjusted Laffey rates for purposes of calculating the lodestar of Tycko & Zavareei LLP and Spangenberg, Shibley, and Liber LLP as Class Counsel, specifically holding that the "the hourly rates at which Class Counsel [wa]s being compensated [we]re reasonable". *Meta v. Target Corporation*, Case No. 4:14-cv-00832-DCN, Doc. 179 (N.D. Ohio Aug. 7, 2018); *see also Brown v. Transurban USA, Inc.*, No. 1:15CV494 (JCC/MSN), 2016 WL 6909683, \*575-76 (E.D. Va. Sept. 29, 2016) (approving of

Adjusted Laffey rates for purposes of calculating the reasonable hourly rate for Tycko & Zavareei attorneys, as well as other Class Counsel); *Small v. BOKF, N.A.*, No. 1:13-cv-01125-REB-MJW, Doc. 184 (D. Colo. March 31, 2016) (approving fees in similar case against Bank of Oklahoma submitted with lodestar cross-check based on Adjusted Laffey Rates); *Kumar v. Salov N. Am. Corp.*, No. 14-CV-2411-YGR, 2017 WL 2902898, at \*7 (N.D. Cal. July 7, 2017) (specifically finding that the hourly rates charged by Tycko & Zavareei LLP, which were determined using the Adjusted Laffey Matrix, "are reasonable and commensurate with those charged by attorneys with similar experience in the market"). And *Gallo v. Moen, Inc.*, even granted plaintiffs attorneys' fees at a rate higher than the Adjusted Laffey Matrix, holding that "[f]ee awards from other districts and the Laffey matrix are . . . relevant [to awarding fees]"). No. 1:13-CV-02440, 2014 WL 4472630, at \*4 (N.D. Ohio Sept. 11, 2014), vacated on other grounds in *Gallo v. Moen, Inc.*, 813 F.3d 265 (6th Cir. 2016).

The Laffey Matrix rates fairly reflect the market rates for class action attorneys in this Court and elsewhere. Indeed, case law recognizes that "the market for class action attorneys is nationwide and populated by very experienced attorneys with excellent credentials." *Brown*, 318 F.R.D. at 575-76. And the Sixth Circuit has expressly recognized that district courts may "look to a national market . . . or any other market they believe appropriate to fairly compensate particular attorneys in individual cases." *Louisville Black Police Officers Org. v. City of Louisville*, 700 F.2d 268, 278 (6th Cir. 1983); *see also McHugh v. Olympia Entm't, Inc.*, 37 F. App'x. 730, 740 (6th Cir. 2002) ("Generally district courts are free to look to national markets, an area of specialization, or any other market they believe is appropriate to fairly compensate attorneys.").

As this Court recognized by appointing Class Counsel to represent the Class, both on an interim basis, as well as at trial, Class Counsel have significant expertise litigating complex financial consumer protection cases in particular, and class action cases more generally. *See, e.g.*, ECF 137-13 at PAGEID #: 1600 (setting forth experience of lead trial lawyers). The Court further expressly

recognized this in open court following the Jury's verdict when the Court indicated appreciation for the high-level of lawyering exhibited by both Parties.

Indeed, Fifth Third hired outside counsel from Williams & Connolly—who are similarly experienced in class action litigation and are similarly based in Washington, D.C.—to represent it in this matter, with hourly rates that exceed the Laffey Matrix. For example, Williams & Connolly recently testified via affidavit in Delaware Chancery Court that its billable hourly rate for a D.C.-based Partner who graduated from law school in 2002 is \$1,275 and \$830 for an Associate, both of which are above the rates Class Counsel seek here. *See* Exhibit 14 to Class Counsel Dec. Likewise, Class Counsel previously worked at similar nationwide law firms that routinely charge rates in excess of the Adjusted Laffey Matrix. Class Counsel Dec. at ightharpoonup 7.

Fifth Third's position that this Court should instead use the Rubin Committee Rates ignores the record evidence submitted by Class Counsel of the reasonable hourly rates paid in the specialized field of class action litigation, as well as applicable case law recognizing that "[o]ut-of-market rates for counsel are appropriate when they have 'expertise and national practice." *Doe v. Ohio*, No. 2:91-CV-00464, 2020 WL 728276 (S.D. Ohio Feb. 12, 2020) (McCann King, J.), report and recommendation adopted, No. 2:91-CV-464, 2020 WL 996561 (S.D. Ohio Mar. 2, 2020) (Watson, J.); see also U.S. ex rel. Lefan v. Gen. Elec. Co., 397 F. App'x 144, 146 (6th Cir. 2010); Snapalease, Inc. v. Sublease Exchange.com, Inc., No. 1:07-CV-45, 2009 WL 1119591, at \*5 (S.D. Ohio Apr. 27, 2009) (recognizing that hourly rates are typically higher in "highly specialized field[s] of practice"). In contrast to the national market for private for-profit class action attorneys, Rubin Committee Rates were set as the presumptive market rate "for non-profit" counsel. Doe v. Ohio, 2020 WL 728276 (emphasis added). Accordingly, in a recent case in this District, Judge Watson applied Rubin Committee Rates to plaintiffs' Ohio-based nonprofit counsel, but applied Laffey Matrix rates to DC-based private counsel in awarding \$3 million in fees.

*Id.* This and other authority cited above supports rejecting any request from Fifth Third to reduce Class Counsel's hourly rates.<sup>4</sup>

2. Courts routinely award full recovery of applicable attorney's fees for a successful claim even if some of the work overlaps with a claim that did not succeed.

As far as the number of hours Class Counsel seeks fees for, these too are eminently reasonable. Both Plaintiffs' TILA and breach-of-contract claims are based on a common core set of facts, such that much of the work required for one claim benefited the other and vice versa. In such circumstances, courts, including the Sixth Circuit, have determined that fees should not be apportioned between successful and unsuccessful claims, but that courts should instead award a fully compensatory fee where a litigant has achieved a successful result. See, e.g., Jordan v. City of Cleveland, 464 F.3d 584, 603 (6th Cir. 2006) (holding that harassment claims and retaliation claim could not be "divorced" from one another, such that a reduction in fees would be an abuse of discretion); Sakhawati v. Lynch, 839 F.3d 476, 480 (6th Cir. 2016) (denying a request to reduce an attorney fee award pursuant to a federal fee-shifting statute to the single claim that plaintiff won where the other claims raised "pertained to a 'common core of facts"); Moore v. Cycon Enterprises, Inc., No. 1:04-CV-800, 2007 WL 2320051, at \*8 (W.D. Mich. Aug. 10, 2007) (declining to reduce fee award where plaintiffs prevailed only on TILA claim, reasoning, in part, that claims arose out of common core of facts and plaintiffs "recovered the maximum statutory damages" on their TILA claims); Tyson v. John R. Serv. Ctr., Inc., No. 13-13490, 2019 WL 5162957, at \*4 (E.D. Mich. Oct. 15, 2019) (claims for breach of contract and for conversion arose out of common core of facts, and fee should not be apportioned); Bagdasaryan v. Bayview Loan Servicing, LLC, No. CV1406691SJOVBKX, 2017 WL 6520591, at \*6 (C.D. Cal. Aug. 25, 2017) ("[A]pportionment of attorneys' fees was not needed where claims 'involve a common core of

 $<sup>^4</sup>$  The reasonable hourly rates for other firms for whom attorneys' fees are being sought are supported by separate declarations filed herewith at Exhibits 11 - 13.

facts or are based on related legal theories."); Greene v. Gibraltar Mortg. Inv. Corp., 529 F. Supp. 186, 188 (D.D.C. 1981) (awarding plaintiff attorneys' fees under TILA claim even though that claim was unsuccessful because plaintiff won her common law claims and both claims "arose from the same operative facts" and "concerned the same issues, i.e., the lack of notice and failure to disclose significant terms"); c.f. Reece v. Carey, No. 3:16-CV-00069-GFVT, 2022 WL 701015, at \*4 (E.D. Ky. Mar. 8, 2022) (claims arising out of attack and later medical care did not arise from common core of facts where the responsible parties for each set of claims "were an entirely different group of defendants" and a "significant amount of time" elapsed between the attack and the treatment).

Plaintiffs nevertheless do not seek the entirety of their fees. Rather, they have excluded any time that was spent solely on Plaintiffs' breach of contract claim, which represents approximately 15% of Class Counsel's total time in this case. For example, Plaintiffs have excluded all of Class Counsel's time following this Court's summary judgment ruling on TILA through trial. Prior to that ruling, there is some time that can be identified as having been spent on tasks exclusively related to Plaintiffs' breach of contract claims. For instance, time spent on the appeal of the Court's order dismissing Plaintiffs' breach of contract claim at the outset of the case is plainly applicable solely to Plaintiffs' breach of contract claim, as Plaintiffs' TILA claim was not on appeal. Class Counsel is not seeking fees for any of that work. However, for the nearly 10 years of this case that Class Counsel spent litigating Plaintiffs' TILA and breach of contract claim alongside each other, it is not feasible to allocate the bulk of Class Counsel's entries to one specific claim or the other, nor does it make sense to do so as the facts and expert analyses pertaining to both claims overlapped significantly.

As a result, Plaintiffs are entitled to a full recovery of all work related to TILA, even if some of that work could also be attributed to the breach of contract claim. Indeed, the Sixth Circuit has roundly endorsed the principle that "[w]here, as here, the claims are related, the fact that some claims ultimately fail while others succeed is not reason to reduce the fee award." *Dowling v. Litton Loan* 

Servicing LP, 320 F. App'x 442, 448 (6th Cir. 2009) (citing DiLaura v. Township of Ann Arbor, 471 F.3d 666 (6th Cir. 2006)). In fact, the Sixth Circuit in Dowling held that "awarding fees for services connected with related claims, though the claims prove unsuccessful, 'supports the underlying purpose of . . . encouraging attorneys to take on civil rights actions." Id. (quoting Jordan v. City of Cleveland, 464 F.3d 584, 604 n. 25 (6th Cir. 2006) (internal citation omitted)).

As to the inter-related nature of the claims in this case, the Sixth Circuit recognized on appeal that the term "annual percentage rate" ("APR") as used in the contract was required to be included in the Early Access Agreement by TILA and accompanying regulations, which define and describe APR, the meaning of which the Sixth Circuit also recognized was "central" to the parties' breach-of-contract dispute. In re Fifth Third Early Access Cash Advance Litig., 925 F.3d 265, 270-71, 276-77 (6th Cir. 2019). Although the Sixth Circuit held that Plaintiffs' TILA and breach of contract claims were separate for purposes of appeal, the Sixth Circuit expressly noted that "each count is not entirely divorced from the other." Id. at 274-75. Fifth Third similarly admits that "TILA was the reason for the inclusion of the APR disclosure in the first place and was thus relevant to the parties' intent for the breach of contract claim." ECF 292 at PAGEID #: 9758. At trial, this Court likewise recognized the interrelated nature of the evidence supporting both claims, including with respect to the definition of APR itself, which the Court referenced in its final jury instructions. See, e.g., ECF No. 270 at PAGEID #: 8617, 8528; ECF No. 255 at PAGEID #: 7649 (disagreeing with Fifth Third that the claims are wholly distinct and noting that even though the claims are different, "the compliance with TILA certainly comes into this case"). And the parties repeatedly discussed TILA by name (or by reference to federal regulations) in argument and witness questioning. See, e.g., ECF No. 250 at PAGEID #: 7277, 7291, 7303-04; ECF No. 262 at PAGEID #: 8118.

Just as Plaintiffs' claims were related, so too was the bulk of the legal work involved. For example, most of the time spent on class certification briefing and notice to Class Members cannot

be segregated by claim. Likewise, most of the discovery in this case, including of Plaintiffs, as well as of defense witnesses was relevant to both of Plaintiffs' claims, particularly given Fifth Third's assertion of a good faith defense in its Answer, which put all of Fifth Third's knowledge and conduct relating to the Early Access Program at issue. Numerous experts for the parties also offered opinions relating to both Plaintiffs' TILA and breach of contract claims. *See, e.g.*, ECF No. 255 at PAGEID #: 7660-61 (Fifth Third's counsel seeking clarity as to how "to put a witness on who had an expert opinion that covered both issues," referring to "TILA and breach of contract").

Counsel for Fifth Third, for example, admits that it relied on Charles Grice as an expert on both TILA and the Contract, and that Mr. Grice "wrote a report saying that he did not think [Fifth Third's conduct] was a violation of TILA." ECF 255 at PAGEID #: 7653. And although Plaintiffs' damages model was tied to their breach of contract claim, Plaintiffs retained expert Art Olsen primarily to crunch the loan transactional data produced by Fifth Third, which, of relevance to TILA, was necessary to identify the average APRs paid by consumers for purposes of demonstrating that Fifth Third's 120% APR could not have been a reasonable estimate and thus violated TILA, something Fifth Third denied up to and even through trial. Class Counsel Dec. at \$\mathbb{P}\$ 10(d). This expert work and related expenses, as well as work required to defend Mr. Olsen against attacks by Defendant's damages expert is thus properly taxed against Fifth Third.

By contrast, Plaintiffs have not requested fees for work with Plaintiffs' damages expert Jonathan Walker, who was solely retained to rebut the breach of contract damages models proposed by Defendant's damages expert. Likewise, Plaintiffs have excluded work pertaining to the parties' experts who opined on consumer understanding of APR, both with the last name of Wilcox as this pertained to contractual understanding of the term APR and not TILA.

# B. The arguments Fifth Third has already previewed that it will raise against Class Counsel's fee motion should be rejected.

Although Fifth Third will seek to minimize Class Counsel's success and efforts on their TILA claim and paint their requested fees as a windfall compared to the Class recovery of \$2 million, the Court should not reduce Class Counsel's fee award based on this proportionality argument. First, as discussed above, the Sixth Circuit has emphasized its "clear precedents holding that a fee award may not be reduced based on a ratio of claims brought to claims won," explicitly rejecting the argument that the plaintiff was "only minimally successful" because plaintiff prevailed on only one of seven claims. *Waldo v. Consumers Energy Co.*, 726 F.3d 802, 823-25 (6th Cir. 2013). Second, courts both within and outside the Sixth Circuit have repeatedly affirmed the award of attorneys' fees and costs even where those amounts well exceeded the recovery in a TILA case.

In *Purtle v. Eldridge*, for example, the Sixth Circuit expressly instructed that "attorney's fees are not limited by the amount of [the plaintiff's] recovery." 91 F.3d 797, 802 (6th Cir.1996); *see also Tyson v. Sterling Rental, Inc.*, No. 13-CV-13490, 2019 WL 3554713, at \*7 (E.D. Mich. Apr. 17, 2019), *report and recommendation adopted sub nom. Tyson v. Sterling Car Rental, Inc.*, 2019 WL 3024719 (E.D. Mich. July 11, 2019) (rejecting defendant's challenge to attorneys' fees based on damages amount because "attorney's fee awards need not be proportional to the amount of damages"); *J. v. Nasser, Inc.*, No. CIV.A. 08-255-JBC, 2010 WL 3825455 (E.D. Ky. Sept. 23, 2010) (same). Even the cases Fifth Third previously cited to support its *ipse dixit* claim that Plaintiffs' attorneys fees were too high include fee awards that exceeded by multiples the damages obtained, by, for example, five times in *Waldo*, 726 F.3d at 824 (6th Cir. 2013), ten times in *Tyson v. John R. Serv. Ctr., Inc.*, No. 13-13490, 2019 WL 5162957, at \*4 (E.D. Mich. Oct. 15, 2019), and three times in *Derry*, 2014 WL 4450146, at \*1.

In short, disproportionality between fees spent and an award obtained is not a reason to deny fees. Rather, such disproportionality is contemplated by statutes like TILA, which provide for feeshifting expressly to encourage law firms to take claims they might not otherwise spend time litigating:

"Congress provided fee shifting to enhance enforcement of important civil rights, consumerprotection, and environmental policies. By providing competitive rates we assure that attorneys will take such cases, and hence increase the likelihood that the congressional policy of redressing public interest claims will be vindicated." Dobina v. Carruthers, No. 5:09-cv-2426, 2010 WL 1796345, at \*6 (N.D. Ohio May 3, 2010) (quoting Student Public Interest Research Group v. AT & T Bell Laboratories, 842 F.2d 1436, 1449 (3d Cir.1989)); see also 10 Charles Alan Wright & Arthur R. Miller, Federal Practice and Procedure § 2675.4 (4th ed) (recognizing that in evaluating requests for fee awards, "[c]ourts have found that Congress wanted to assure private citizens a meaningful opportunity to remedy civil- and constitutional-rights violations by encouraging plaintiffs to serve as private-attorneys-general in effectuating the important objective" of the statute at issue); Daenzer v. Wayland Ford, Inc., 210 F.R.D. 202 (W.D. Mich. 2002) ("The court must . . . award attorney's fees to a prevailing plaintiff sufficient to vindicate the Congressional goal of creating a system of private attorneys general to aid in effective enforcement of the Truth in Lending Act."), rev'd on other grounds, 134 F. App'x 911 (6th Cir. 2005); de Jesus v. Banco Pop. de Puerto Rico, 918 F.2d 232, 234 (1st Cir. 1990) (holding TILA was "designed to create a system of 'private attorney generals" to aid in effective enforcement of the substantive statute); McGowan v. King, Inc., 569 F.2d 845, 848 (5th Cir. 1978) (same); Hannon v. Sec. Nat'l Bank, 537 F.2d 327 (9th Cir. 1976) ("The purpose behind granting attorney's fees is to make a litigant whole and to facilitate private enforcement of the Truth in Lending Act"); Bryce v. Lawrence, No. 09-48516, 2013 WL 5676327, at \*4 (Bankr. W.D. Wash. Oct. 17, 2013) (the attorneys' fee provisions of consumer protection statutes, including TILA, must be "construed liberally in favor of the consumer in order to ensure that consumers are able to attract competent counsel and that their rights are protected."); Sarah Vandenbraak Hart, Evaluating Institutional Prisoners' Rights Litigation: Costs and Benefits and Federalism Considerations, 11 U. Pa. J. Const. L. 73, 82-83 (2008) (discussing enactment of proportionality requirement for fee awards under the Prisoners' Litigation Reform Act).

Nor is there anything unreasonable about Plaintiffs' lodestar. Here, Plaintiffs litigated their TILA claim almost to trial and won the maximum amount allowed under the statute for each TILA violation in this contested class action that was filed over ten years ago. Substantial fees are therefore warranted. *See Carroll v. United Compucred Collections, Inc.*, No. 1:99-00152, 2008 WL 3001595, at \*5 (M.D. Tenn. July 31, 2008) (rejecting defendant's challenge to attorneys' fees because "Plaintiffs in this case were highly successful, prevailing on their motion for partial summary judgment, obtaining class certification, fulfilling a significant purpose behind the FDCPA by acting as 'private attorneys general' and obtaining recovery for class members, and receiving monetary judgment for themselves above the statutory maximum as provided in the FDCPA"; and holding that that the fee award was particularly reasonable in light of the fact that the litigation spanned seven years).

In the parallel case of *Small v. BOKF, N.A.*, the court approved a \$1.325 million award to Class Counsel, which supports the reasonableness of Class Counsel's fee request here given that summary judgment on liability was granted over a year following the filing of the initial complaint—far from the more than ten years the parties litigated in this case; hence the understandably higher fees here. No. 1:13-cv-01125-REB-MJW, Doc. 184 (D. Colo. March 31, 2016). That experienced Class Counsel spent significant time and resources litigating this case for over ten years on a contingent basis at great opportunity cost to each firm is not a reason to reduce fees by arbitrarily lowering Class Counsel's compensation, but rather would otherwise support a lodestar *enhancement*.

Indeed, although Plaintiffs' TILA claims were capped by virtue of this case being a class action, Fifth Third aggressively litigated in defense of this claim, including at summary judgment and through expert testimony. Had there been no such statutory cap, statutory damages would have amounted to between \$44 million and \$447 million. It is thus certainly not Plaintiffs who will be receiving a windfall if the Court were to award their full requested lodestar, but Fifth Third, who instead of having to pay full statutory damages to each of the 447,000 Class members, has its liability capped at \$2 million.

There is no basis in law or fact, however, to give Fifth Third a discount on the attorneys' fees and costs it is obligated to pay under TILA's fee-shifting provision.

#### C. Plaintiffs are entitled to a modest service award of \$10,000 per Plaintiff.

As this Court has acknowledged, service awards "are payments that are intended to cover the time and money that Class Representative[s] spend[] fulfilling [their] responsibilities." *Emch v. Community Insurance Company*, No. 1:17-cv-856, 2021 WL 9096702, at \*1 (S.D. Ohio Aug. 9, 2021) (Barret, J.). And in this case, Plaintiffs have spent a great deal of time carrying out their responsibilities. They have participated in numerous meetings with their attorneys, reviewed discovery requests and responses, and sat for depositions. Class Counsel Dec. at P 20. And, although not part of the TILA claim, Plaintiffs testified in person at trial. Plaintiffs' work, across more than 10 years of litigation, achieved a positive result on behalf of the Class, and therefore merits a service award of \$10,000 per Plaintiff.

This Court has previously awarded such service awards of \$10,000 per Plaintiff. See NorCal Tea Party Patriots v. Internal Revenue Service, No. 1:13-cv-341, 2018 WL 3957364, at \*2-3 (S.D. Ohio Aug. 17, 2018) (Barrett, J.). In so ruling, the Court noted that service awards "generally range from a few thousand dollars to \$85,000." Id. at \*2 quoting Liberte Capital Group v. Capvill, NO. 5:99-cv-818, 2007 WL 2492461 (N.D. Ohio Aug. 29, 2007). In fact, in numerous instances, courts in this District have ordered service awards of \$50,000 or greater per plaintiff, which is the amount that Plaintiffs seek collectively here. See, e.g., Brotherton v. Clevland, 141 F. Supp. 2d 907, 914 (S.D. Ohio 2001) (awarding class representative \$50,000 incentive award); In re Dun & Bradstreet Customer Litigation, 130 F.R.D. 366, 373-374 (S.D. Ohio 1990) (awarding incentive awards ranging of \$55,000 to two class representatives and \$35,000 to three class representatives).

#### D. This Court should order Defendant to pay the cost of Notice.

Plaintiffs' instant request for costs properly includes those costs previously incurred to provide notice to the Class of the Court's certification decision as required by Fed. R. Civ. P. 23(c)(2)(B). Not only should this Court award these prior notice costs, it should further order Fifth Third to bear any ongoing cost of notice to the Class regarding the Court's TILA ruling and Plaintiffs' motion for attorneys' fees, as well as the cost of any claims process and distribution of funds to the Class. Although the parties will meet and confer as discussed regarding what such notice and distribution process will entail, the Court previously granted Plaintiffs' Motion for Entry of Judgment, Attorneys' Fees and Costs, and for a Briefing and Class Notice Schedule, which included a request that the Court order Defendant to pay ongoing notice costs. ECF No. 301 PAGEID # 10345-48.

Just like Plaintiffs' other costs, these costs are taxable to Fifth Third. See, e.g., Hook v. Baker, C2-02-CV-901, 2004 WL 3113717 (S.D. Ohio Sept. 1, 2004), modified, C2-02-CV-901, 2004 WL 3113714 (S.D. Ohio Sept. 13, 2004) ("[B]ecause the Court has already certified the class and determined that defendant is liable to plaintiffs for violating the TILA and ORISA, the cost of the notice should be borne by defendant"); Bakov v. Consol. World Travel, Inc., 21-2653, 2023 WL 3558175 (7th Cir. May 19, 2023) (upholding district court's shifting of costs of class notice to defendant after certifying class and entering summary judgment in favor of plaintiffs); Macarz v. Transworld Sys., Inc., 201 F.R.D. 54, 58 (D. Conn.2001) (agreeing with the plaintiff that "because liability has already been determined, defendant bears the cost of notice to the class"); Six (6) Mexican Workers v. Ariz. Citrus Growers, 641 F. Supp. 259, 264 (D. Ariz.1986) (directing defendants to pay notice costs in part because "liability of the defendants will have already been established"); Catlett v. Missouri Highway and Transp. Comm'n, 589 F. Supp. 949, 952 (D. Mo. 1984) (shifting notice costs "because the liability of the Idefendant] has been established").

Indeed, class action defendants are routinely required to pay notice costs once the defendant's liability has been established, even where liability is preliminarily or partially established, or subject to appeal. This is in line with the general principle that "interim litigation costs, including class notice costs, may be shifted to defendant after plaintiff's showing of some success on the merits, whether by preliminary injunction, partial summary judgment, or other procedure." 3 William B. Rubenstein, Alba Conte, and Herbert B. Newberg, Newberg on Class Actions § 8:6 (4th ed. 2007); *Hunt v. Imperial Merchant Services, Inc.*, 560 F.3d 1137 (9th Cir. 2009) (finding district court did not abuse discretion in ordering defendants to pay interim costs including class notice); *Bickel v. Whitley County Sheriff*, 2010 WL 5564634, \*3 (N.D. Ind. 2010), report and recommendation adopted, 2011 WL 91032 (N.D. Ind. 2011) (noting that "the fact that Defendant may appeal the summary judgment ruling does not preclude the shifting of fees to Defendant'); *Fournigault v. Independence One Mortg. Corp.*, 242 F.R.D. 486 (N.D. Ill. 2007) (assigning notice costs to defendant based on the judge's nonbinding, nonfinal impression of how liability in the case was likely to be decided).

# E. The Court should also order Fifth Third to pay Plaintiffs' ongoing attorneys' fees and costs for continuing litigation regarding the TILA cause of action and distribution of the TILA funds to class members.

As demonstrated by the difficulty in even establishing a briefing schedule for the instant motion, Defendant zealously litigates every issue. That is fine, and that is Defendant's prerogative. But Fifth Third has to live with the consequences with its take-no-prisoners style of litigation. Here, every objection and roadblock that it erects causes Plaintiffs and their counsel to incur additional fees. And to the extent that those fees are related to the TILA claim, Plaintiffs will be entitled to recover them from the bank. For instance, Plaintiffs will almost certainly incur fees dealing with the distribution of funds to the Class. They will also likely incur fees dealing with any appeal that Defendant undertakes. For that reason, Plaintiffs expect and anticipate that they will seek additional fees from the Court and asks the Court to retain jurisdiction to consider such requests.

#### **CONCLUSION**

For all the reasons stated herein, Plaintiffs respectfully request that the grant Plaintiffs' motion for attorney's fees, costs, and incentive awards and order that Defendant bear the cost of notice and distribution of funds to the Class.

Dated: December 22, 2023 Respectfully submitted,

#### /s/ Hassan A. Zavareei

Hassan A. Zavareei (pro hac vice) Anna A. Haac (pro hac vice) Shana H. Khader (pro hac vice)

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Class Counsel for Plaintiffs

#### **CERTIFICATE OF SERVICE**

On December 22, 2023, a true and correct copy of the foregoing was filed via the Court's Electronic Filing System. Copies will be served upon counsel of record by, and may be obtained, through the Court's CM/ECF Systems.

Respectfully submitted,

/s/ Hassan A. Zavareei

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Class Counsel for Plaintiffs

## EXHIBIT A

#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

In re: Fifth Third Early Access Cash Advance Litigation Case No. 1:12-cv-00851-MRB

Judge Michael R. Barrett

# DECLARATION OF LEAD CLASS COUNSEL IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS

We, Hassan A. Zavareei, Stuart Scott, and Jason Whittemore, hereby declare as follows:

- 1. This declaration is made in support of Plaintiffs' renewed Motion for Attorneys' Fees and Costs. We have personal knowledge of all the facts stated herein based on our active participation in the prosecution and trial of the above-captioned consolidated matter and our firm's business records, and, if called as witnesses, we could and would competently testify thereto.
- 2. On July 23, 2013, pursuant to Fed. R. Civ. P. 23(g), this Court appointed us as interim co-lead class counsel to represent Plaintiffs and the putative class against Fifth Third Bank ("Fifth Third" or the "Bank"). (See Doc. 63, PAGEID #: 708.) Thereafter, on March 26, 2021, this Court certified a Breach of Contract and TILA Class and officially appointed us as counsel for the certified Classes. (See Doc. 150.) We thereafter formally served as lead Class Counsel through summary judgment on Plaintiffs' Truth in Lending Act ("TILA") claim, trial on Plaintiff's breach of contract claim, and briefing of post-trial motions, all of which work was done on a purely contingency fee basis. As such, we have received no compensation for our time and expenses incurred since the inception of this case over ten years ago. And we will continue to serve in a contingency fee capacity as Class Counsel with respect to any appeals.

3. The depth and breadth of our firm's experience in complex cases, including class actions against financial institutions, has been set forth previously in declarations filed with this Court and is hereby incorporated by reference. *See* Doc. 51-1, 58-2, 136-13. In addition, we include our firm resumes here at Exhibits 1, 4, and 7.

#### Attorneys' Fees for TILA Claim

- 4. As set forth in Plaintiffs' renewed Motion for Attorneys' Fees and Costs, filed contemporaneously herewith, we are seeking reasonable attorney fees and costs under the fee-shifting provisions of the Truth in Lending Act ("TILA") for time and expenses incurred by our firms, as well as other firms who performed work on these cases prior to consolidation or at our direction following our appointment as Class Counsel. The total amount of fees that we are seeking for Class Counsel's time is \$5,008,149.03<sup>1</sup> and the total amount of expenses we incurred as Class Counsel is \$310,600.37.
- 5. The hourly rates used to calculate the fees sought for Tycko & Zavareei LLP, Spangenberg, Shibley, and Liber, LLP, and Wagner, McLaughlin, and Whittemore P.A. are those set forth in the "LSI Adjusted Laffey Matrix" (http://www.laffeymatrix.com/).
- 6. Courts throughout the country, including in Ohio and this District, have used the Adjusted Laffey Rates when awarding fees in class action cases, including to Class Counsel in particular. Indeed, a court in this District awarded Tycko & Zavareei LLP and Spangenberg, Shibley, and Liber LLP attorney's fees using Adjusted Laffey rates for purposes of a lodestar cross-check in another class action case against Fifth Third Bank. *See Smith v. Fifth Third Bank*, No. 1:18-cv-00464-DRC-SKB, Doc. 130 (S.D. Ohio Aug. 31, 2021). The Northern District of Ohio has also expressly

<sup>&</sup>lt;sup>1</sup> This time reflects additional hours incurred following Class Counsel's last pull of time records, which relates to, among other things, Plaintiffs' Supplemental Declaration, ECF No. 297, Fifth Third's Motion to Strike, ECF No. 298, and the related status conference with the Court, as well as some hours from Tycko & Zavareei that were inadvertently excluded from Plaintiffs' Supplemental Declaration due to a clerical error.

approved of the use of Laffey rates for purposes of calculating the lodestar of Tycko & Zavareei LLP and Spangenberg, Shibley, and Liber LLP as Class Counsel, specifically holding that the "the hourly rates at which Class Counsel [wa]s being compensated [we]re reasonable". *Meta v. Target Corporation*, Case No. 4:14-cv-00832-DCN, Doc. 179 (N.D. Ohio Aug. 7, 2018); *see also Brown v. Transurban USA*, *Inc.*, No. 1:15CV494 (JCC/MSN), 2016 WL 6909683, \*575-76 (E.D. Va. Sept. 29, 2016) (approving of Adjusted Laffey Rates for purposes of calculating the reasonable hourly rate for Tycko & Zavareei attorneys, as well as other Class Counsel, and citing case law recognizing that the "the market for class action attorneys is nationwide and populated by very experienced attorneys with excellent credentials"); *Small v. BOKF, N.A.*, No. 1:13-cv-01125-REB-MJW, Doc. 184 (D. Colo. March 31, 2016) (approving fees in similar case against Bank of Oklahoma submitted with lodestar cross-check based on Adjusted Laffey rates); *Kumar v. Salov N. Am. Corp.*, No. 14-CV-2411-YGR, 2017 WL 2902898, at \*7 (N.D. Cal. July 7, 2017) (specifically finding that the hourly rates charged by Tycko & Zavareei LLP, which were determined using the Adjusted Laffey Matrix, "are reasonable and commensurate with those charged by attorneys with similar experience in the market").

7. The reasonableness of the hourly rates sought by each of our respective firms are supported by the rates charged by other firms with similar experience and expertise in the area of complex and class action litigation, including defense counsel from Williams & Connolly LLP, whose D.C.-based attorneys defended this case through trial. Indeed, Williams & Connolly recently testified via affidavit in Delaware Chancery Court that its billable hourly rate for a D.C.-based Partner who graduated from law school in 2002 is \$1,275 and \$830 for an Associate, both of which are above the rates sought here.<sup>2</sup> See Ex. 14. Hassan Zavareei, in fact, started his legal career at Gibson, Dunn &

<sup>&</sup>lt;sup>2</sup> Likewise, the law firm McDermott Will & Emery LLP recently submitted hourly rates for attorneys across the country for work relating to a bankruptcy case pending in this District that were above those counsel request herein: specifically \$1,215-\$1,305 for Partners and \$1,000-\$1,170 for Associates of comparable seniority to Class Counsel and their firm colleagues. *See, e.g., In re: Volunteer Energy* 

Crutcher LLP ("Gibson Dunn"), a "big law" firm that is comparable to Williams & Connolly, where he managed the defense of a nationwide class action brought against a major insurance carrier. Partners at Gibson Dunn with Mr. Zavareei's seniority generally bill at hourly rates in excess of \$1,500 and up to \$2500 for lead plaintiffs and defense lawyers in similar positions as Mr. Zavareei. Likewise, Anna Haac, who was part of the trial team in this case, was also an attorney at another comparable law firm and competitor of Williams & Connolly, Covington & Burling, where partners who graduated the same year she did from law school generally bill at hourly rates in excess of \$800. Another member of the trial team, Dennis Lansdowne, worked at the multinational law firm Jones Day following two clerkships. Partners at Jones Day with Mr. Lansdowne's seniority often bill at hourly rates in excess of \$1,000. In short, there is ample support for the hourly rates sought by Class Counsel, including the going market rates paid to defend cases such as this one.

- 8. The reasonable hourly rates, time, and total dollar amounts for other firms for whom attorneys' fees are being sought are supported by separate declarations filed herewith at Exhibits 11 13.
- 9. With respect to the number of hours and nature of work undertaken, we include herewith at Exhibits 2, 5, 8, and 9, the time records in this case for each of our firms (excluding time that is segregable and solely attributable to Plaintiffs' breach of contract claim), as well as declarations and associated time records of other firms who worked on this matter prior to consolidation or at Class Counsel's direction after consolidation, the latter of which can be found at Exhibits 11 13. We

Services, Inc., Case No. 22-50804 (Bankr. S.D. Oh.) at Doc. 883, 923, and 924.

<sup>&</sup>lt;sup>3</sup> For example, the hourly billing rate of Neal Katyal, who recently argued opposite Mr. Zavareei before the Supreme Court, is approximately \$2500 per hour. *In re Management* LLC, Case No. 21-30589 (Dkt. 2476, 2508) (Bankr. D.N.J. June 15, 2022). Likewise, the hourly billing rate of David Boies, who like Mr. Zavareei founded his own law firm, which represents consumers in class action cases as well as paying clients, is approximately \$2100 per hour. *Doe v. Deutsche Bank et al.*, Case No. 1:22-CV-10018 (Dkt. 106) (S.D.N.Y. Sept. 15, 2023).

also note that our firms expect to incur additional time and expenses that would properly be awarded in connection with Plaintiffs' success on their TILA claim, but is not accounted for herein, including related to briefing Defendant's anticipated objection to Class Counsel's requests for fees and notice and distribution of funds to the class, as well as any appeal of this Court's TILA ruling.

10. Below is a high-level summary of some, but certainly not all, of the work performed by or at the direction of Class Counsel and which is reflected in the billing and expense records attached hereto. Again, this work was performed wholly on a contingency fee basis over the course of ten plus years at great risk of never receiving any compensation.

#### a. Drafting Complaints and Related Coordination and Motion Briefing.

The first Complaint was filed in this case and District over ten years ago and was the first of its kind involving the type of payday loan advance product implemented by Fifth Third, which was one of four banks who rolled out similar products. Accordingly, significant factual and legal research was required in the complaint-drafting stage. Thereafter, other complaints were filed around the country, which resulted in briefing motions to appoint interim lead class counsel and required coordination among various Plaintiffs' counsel, including a meeting with the Court, as well as implementation of an organizational structure to ensure that work was done efficiently across firms and recorded properly. For example, following this Court's appointment of undersigned counsel as interim co-lead class counsel, we worked to draft an amended consolidated complaint, interview and narrow the named Plaintiffs, and establish a billing protocol. Plaintiffs' counsel also had to brief Fifth Third's motion to dismiss, including on Plaintiffs' TILA claim. None of this work is segregable and thus has been properly requested as part of Class Counsel's reasonable lodestar for obtaining summary judgment on Plaintiffs' TILA claim. By contrast, reimbursement for work relating to Plaintiffs' motion for reconsideration of the Court's order dismissing all non-TILA claims and thereafter request for entry of judgment is not sought herein.

- b. Mediation and Settlement Negotiations. Following this Court's grant of Fifth Third's Motion to Dismiss on all claims except for Plaintiffs' TILA claim, the parties engaged in settlement discussions, which involved the exchange of discovery and demand letters for settlement purposes, as well as a settlement conference and the submission of mediation statements before this Court. Thereafter, the parties and this Court continued to engage in settlement efforts, with Class Counsel drafting and sending demand letters and preparing for later settlement conferences with this Court. The time sought herein for these efforts at all times included proposed settlement of Plaintiffs' TILA claims. None of this work is segregable and thus has been properly requested as part of Class Counsel's reasonable lodestar for obtaining summary judgment on Plaintiffs' TILA claim. By contrast, reimbursement for work relating to Plaintiffs' appeal of the Court's dismissal of their breach of contract claim, which was pending during the parties' initial and extensive settlement discussions, is not requested here.
- c. Formal Discovery. This case involved reasonably extensive, but targeted discovery. Class Counsel worked with Fifth Third on a joint protective order, issued discovery requests, met and conferred over search terms and discovery disputes, prepared notices of deposition and subpoenas, drafted a 30(b)(6) deposition notice, and took the depositions of numerous defense witnesses and experts, as well as defended our Plaintiffs' depositions. We also extensively reviewed and analyzed discovery responses and document productions to identify hot documents and prepare for these depositions, which involved the implementation of a document review platform and training of document reviewers, among other things. We also worked with Plaintiffs and our experts to gather documents and information for purposes of responding to discovery requests.
- d. **Motion Briefing and Research.** These actions were aggressively litigated by opposing counsel, requiring Class Counsel to research and respond to a variety of defensive motions, including a motion to dismiss, motions to exclude our experts, and a motion for summary judgment,

as well as various procedural motions. In addition, we researched and drafted successful affirmative motions, including for class certification, to exclude Defendants' experts, and for partial summary judgment. Using our best efforts, we have attempted to exclude any time identifiable in a review of our records as attributable solely to Plaintiffs' breach of contract claim, such as research on Fifth Third's voluntary payor defense and briefing of Plaintiffs' summary judgment motion on notice, neither of which could have impacted the Class's recovery on TILA. By way of another example, we excluded work pertaining to the parties' experts who opined on consumer understanding of APR, both with the last name of Wilcox as this likewise pertained to contractual understanding of the term APR and not TILA. By contrast, we included work relating to the parties' TILA experts, as well as work pertaining to the parties' damages experts prior to the Court granting summary judgment on Plaintiffs' TILA claim. With respect to the latter, Plaintiffs retained expert Art Olsen primarily to crunch the loan transactional data produced by Fifth Third, which, of relevance to TILA, was necessary to identify the average APRs paid by consumers for purposes of demonstrating that Fifth Third's 120% APR could not have been a reasonable estimate and thus violated TILA, something Fifth Third denied up to and even through trial. This expert work and related expenses, as well as work required to defend Mr. Olsen against attacks by Defendant's damages expert is thus properly taxed against Fifth Third. We have not, however, included time or expenses reflecting Plaintiffs' damages expert Jonathan Walker, who was solely retained to rebut the breach of contract damages models proposed by Defendant's damages expert.

- e. **Class Notice**. Following this Court granting Plaintiffs' Motion for Class Certification, Class Counsel prepared a notice plan, retained and oversaw a settlement administrator to provide notice, and met and conferred with opposing counsel regarding the same.
- f. **Trial Preparation**. This case was on the eve of a multi-week class action jury trial when this Court granted summary judgment on Plaintiffs' TILA claim. Class Counsel had thus

done nearly all of the work necessary to try this claim, such as identifying trial exhibits and deposition designations, preparing pre-trial fillings, including drafting and research for proposed jury instructions, motions *in limine*, and Plaintiffs' pre-trial statement, preparing client and witness testimony outlines, creating demonstrative trial exhibits, and coordinating with trial vendors. Very little of this work is segregable and thus should be taxed to Fifth Third. Indeed, even at trial, significant time was spent focused on issues relating to TILA, including demonstrating the average APR and loan length on Early Access Loans using the definition and calculation for APR set forth in TILA.

- g. Court Appearances and Hearings. Various case management and status conferences were held before this Court that Class Counsel prepared for and attended, both in-person and remotely. The fees requested herein, however, do not include any hours incurred at trial or attending pre-trial hearings on the parties' respective motions in limine, following this Court's summary judgment ruling on TILA.
- 11. As touched on above, Class Counsel's work on Plaintiffs' TILA claim is not yet done. For example, with respect to Plaintiffs' TILA claim, Class Counsel will be required to, among other things: (1) oversee the notice administration and monetary distribution process; (2) respond to class member inquiries now and potentially for years to come; (3) respond to any objections to Plaintiffs' Motion for Attorneys' Fees and Expenses; and (4) potentially handle post-judgment appeals of this Court's summary judgment ruling on TILA as well as any ruling on Plaintiffs' Motion for Attorneys' Fees and Expenses, all of which is properly taxable against Fifth Third.

#### Class Counsel's Costs & Expenses

12. To date, Class Counsel has incurred \$310,600.37 in reasonable and necessary costs and expenses in connection with this case and which are properly attributable to Plaintiffs' TILA claim.

These sums correspond to certain actual out-of-pocket costs and expenses, as reflected in our firms'

records, and are the type of expenses routinely charged to paying clients in the marketplace and, thus awarded by courts in full.

- 13. Class Counsel is not requesting fees paid to expert witnesses. Further, Class Counsel have excluded from their request all travel-related meal costs, including the coffee costs that Fifth Third previously objected to, as a gesture of reasonableness, notwithstanding that those are properly compensable. Overall, Class Counsel has reduced its request for the payment of costs by \$246,114.18.
- 14. Our firms have documentation evidencing these expenses, each of which is listed in summary form at Exhibits 3, 6, and 10.
- 15. Additional expenses incurred by Barnow and Associates, P.C. prior to consolidation or at the direction of Class Counsel following our appointment are included with the declaration of Ben Barnow attached herewith at Exhibit 11 and amount to \$4,971.76.
- 16. In total, the reasonable costs and expenses incurred by counsel properly attributable to Plaintiffs' TILA claim is \$315,572.13. These do not include any expenses that are solely attributable to Plaintiffs' breach of contract claim, such as expenses relating to the appeal of this Court's dismissal of that claim or incurred by Class Counsel for purposes of trying such claim.
- 17. In addition, Class Counsel's future costs (e.g., any costs associated with an appeal of the Court's TILA ruling or other costs connected with the provision and ongoing monitoring of the TILA Class notice and fund distribution process, including responding to objections) are not included above.

#### **Service Awards**

18. Finally, Class Counsel respectfully submit that the named Plaintiffs/Class Representatives in this consolidated action should each receive a reasonable service award of \$10,000

for their extensive and enduring efforts in these actions, as well as the personal exposure and risk that they faced.

- 19. The Service Awards requested for Plaintiffs are in recognition of the time and effort they committed to actively pursuing this litigation, including working with Class Counsel and otherwise actively assisting in the successful prosecution of their TILA claim. All were exemplary named Plaintiffs/Class Representatives.
- 20. Plaintiffs met and participated in phone calls with Class Counsel on numerous occasions, spent time reviewing their personal records and producing relevant documents when needed to supplement the record in these actions, promptly responded to questions from Class Counsel, reviewed information or materials pertinent to their and the class's claims, and remained informed about the status of the litigation. Plaintiffs also had to sit for depositions (and attend trial). Notwithstanding the demands of this litigation over the course of over ten years (which necessarily competed with other personal and professional commitments), Plaintiffs collectively dedicated their time and resolve to diligently participating in these cases. Their commitment to ensuring that consumer borrowers like them are protected at their most vulnerable moments is inspiring and has been invaluable given the protracted nature of this litigation, and the required level of their involvement throughout.
- 21. Plaintiffs also took the risk of exposing themselves to publicity by attaching their names to a publicly filed class action lawsuit with the hope of helping others. Moreover, Plaintiffs' time spent and effort exerted, out of their personal lives, was made to support a case in which they had a relatively modest personal interest.
- 22. In Class Counsel's opinion, the requested Service Awards are thus reasonable given the demands of these cases and the magnitude of diligence required over the past ten plus years. In

light of their sacrifice and contribution to the successful prosecution of these actions, Class Counsel respectfully requests that Plaintiffs each be granted Service Awards of \$10,000.

We declare under the penalty of perjury that the foregoing is true and correct.

/s/Hassan A. Zavareei

Hassan A. Zavareei

Executed this 22nd day of December 2023, in Washington, D.C.

/s/ Stuart Scott

Stuart Scott

Executed this 22nd day of December 2023, in Cleveland, Ohio.

/s/ Jason Whittemore

Jason Whittemore

Executed this 22nd day of December 2023, in Tampa, Florida.

# EXHIBIT 1



#### Firm Resume

Jonathan Tycko and Hassan Zavareei founded Tycko & Zavareei LLP in 2002 when they left a large national firm to form a private public interest law firm. Since then, a wide range of clients have trusted the firm with their most difficult problems. Those clients include individuals fighting for their rights, tenants' associations battling to preserve decent and affordable housing, consumers seeking redress for unfair business practices, whistleblowers exposing fraud and corruption, and non-profit entities and businesses facing difficult litigation.

The firm's practice focuses on complex litigation, with a particular emphasis on consumer and other types of class actions, and *qui tam* and False Claims Act litigation. In its class action practice, the firm represent consumers who have been victims of corporate wrongdoing. The firm's attorneys bring a unique perspective to such litigation because many of them trained at major national defense firms where they obtained experience representing corporate defendants in such cases. This unique perspective enables the firm to anticipate and successfully counter the strategies commonly employed by corporate counsel defending class action litigation. Tycko & Zavareei LLP's attorneys have successfully obtained class certification, been appointed class counsel, and obtained approval of class action settlements with common funds totaling over \$500 million.

Tycko & Zavareei LLP's twenty-four attorneys graduated from some of the nation's finest law schools, including Harvard Law School, Columbia Law School, Duke University School of Law, UC Berkeley School of Law, UC Hastings College of the Law, Georgetown Law, the University of Michigan Law School, and the University of Miami School of Law. They have served in prestigious clerkships for federal and state trial and appellate judges and have worked for low-income clients through competitive public interest fellowships. The firm's diversity makes it a leader amongst its peers, and the firm actively and successfully recruits attorneys who are women, people of color, and LGBTQ. To support its mission of litigating in the public interest, Tycko & Zavareei LLP offers a unique public interest fellowship for recent law graduates. Tycko & Zavareei LLP's attorneys practice in state and federal courts across the nation.



## Hassan A. Zavareei

#### Partner

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Mr. Zavareei has devoted the last eighteen years to recovering hundreds of millions of dollars on behalf of consumers and workers. He has served in leadership roles in dozens of class action cases and has been appointed Class Counsel on behalf of numerous litigation and settlement classes. An accomplished and experienced attorney, Mr. Zavareei has litigated in state and federal courts across the nation in a wide range of practice areas; tried several cases to verdict; and successfully argued numerous appeals, including in the D.C. Circuit, the Fourth Circuit, and the Fifth Circuit.

After graduating from UC Berkeley School of Law, Mr. Zavareei joined the Washington, D.C. office of Gibson, Dunn & Crutcher LLP. There, he managed the defense of a nationwide class action brought against a major insurance carrier, along with other complex civil matters. In 2002, Mr. Zavareei founded Tycko & Zavareei LLP with his partner Jonathan Tycko.

Mr. Zavareei has served as lead counsel or co-counsel in dozens of class actions involving deceptive business practices, defective products, and/or privacy. He has been appointed to leadership roles in multiple cases. As Lead Counsel in an MDL against a financial services company that provided predatory debit cards to college students, Mr. Zavareei spearheaded a fifteen-million-dollar recovery for class members. He is currently serving as Co-Lead Counsel in consolidated proceedings against Fifth Third Bank, and on the Plaintiffs' Executive Committee in MDL litigation against TD Bank. As Co-Lead Counsel in Farrell v. Bank of America, a case challenging Bank of America's punitive overdraft fees, Mr. Zavareei secured a class settlement valued at \$66.6 million in cash and debt relief, together with injunctive relief forcing the bank to change a practice that will save millions of low-income consumers approximately \$1.2 billion in overdraft fees. In his Order granting final approval, Judge Lorenz of the U.S. District Court for the Southern District of California described the outcome as a "remarkable" accomplishment achieved through "tenacity and great skill."



#### Education

UC Berkeley School of Law, 1995, Order of the Coif Duke University, 1990, *cum laude* 

#### Bar Admissions

California District of Columbia Maryland Supreme Court of the United States

#### Memberships

Public Justice, Board Member American Association for Justice

#### Awards

Washington Lawyers Committee, Outstanding Achievement Award Super Lawyer Lawdragon 500

#### Presentations & Publications

Witness Before the Subcommittee on the Constitution and Civil Justice, 115th Congress

Witness Before the Civil Rules Advisory Committee, 2018, 2019

Editor, Duke Law School Center for Judicial Studies, Guidance on New Rule 23 Class Action Settlement Provisions

## Andrea R. Gold

#### Partner

202.973.0900 agold@tzlegal.com

Andrea Gold has spent her legal career advocating for consumers, employees, and whistleblowers. Ms. Gold has litigated numerous complex cases, including through trial. Her extensive litigation experience benefits the firm's clients in both national class action cases as well as in qui tam whistleblower litigation.

She has served as trial counsel in two lengthy jury trials.

In her class action practice, Ms. Gold has successfully defended dispositive motions, navigated complex discovery, worked closely with leading experts, and obtained contested class certification. Her class action cases have involved, amongst other things, unlawful bank fees, product defects, violations of the Telephone Consumer Protection Act, and deceptive advertising and sales practices.

Ms. Gold also has significant civil rights experience. She has represented individuals and groups of employees in employment litigation, obtaining substantial recoveries for employees who have faced discrimination, harassment, and other wrongful conduct. In addition, Ms. Gold has appellate experience in both state and federal court.

Prior to joining Tycko & Zavareei LLP, Ms. Gold was a Skadden fellow. The Skadden Fellowship Foundation was created by Skadden, Arps, Slate, Meagher & Flom LLP, one of the nation's top law firms, to support the work of new attorneys at public interest organizations around the country.

Ms. Gold earned her law degree from the University of Michigan Law School, where she was an associate editor of the Journal of Law Reform, co-President of the Law Students for Reproductive Choice, and a student attorney at the Family Law Project clinical program. Ms. Gold graduated with high distinction from the University of Michigan Ross School of Business in 2001, concentrating her studies in Finance and Marketing.



#### Education

University of Michigan Law School, 2004

University of Michigan, Ross School of Business, 2001

#### **Bar Admissions**

District of Columbia Illinois Maryland

#### Memberships

American Association for Justice

National Associate of Consumer Advocates

National Employment Lawyers Association

Public Justice

Taxpayers Against Fraud Education Fund

#### Awards

National Trial Lawyers, Top 100 Civil Plaintiff Lawyers, 2020

Super Lawyers, Rising Star

Skadden Fellow, Skadden Arps Slate Meagher & Flom LLP, 2004-2006



# Jonathan Tycko

#### Partner

202.973.0900 jtycko@tzlegal.com

In his 25 years of practice, Jonathan Tycko has represented a wide range of clients, including individuals, Fortune 500 companies, privately-held business, and non-profit associations, in both trial and appellate courts around the country. Although he continues to handle a variety of cases, his current practice is focused primarily on helping whistleblowers expose fraud and corruption through qui tam litigation under the False Claims Act and other similar whistleblower statutes. Mr. Tycko's whistleblower clients have brought to light hundreds of millions of dollars in fraud in cases involving healthcare, government contracts, customs and import duties, banking and tax.

Prior to founding Tycko & Zavareei LLP in 2002, Mr. Tycko was with Gibson, Dunn & Crutcher LLP, one of the nation's top law firms. He received his law degree in 1992 from Columbia University Law School, and earned a B.A. degree, with honors, in 1989 from The Johns Hopkins University. After graduating from law school, Mr. Tycko served for two years as law clerk to Judge Alexander Harvey, II, of the United States District Court for the District of Maryland.

In addition to his private practice, Mr. Tycko is an active participant in other law-related and community activities. He currently serves on the Conference Committee of the Taxpayers Against Fraud Education Fund, charged with planning the premier annual conference of whistleblower attorneys and their counterparts at the United States Department of Justice and other government agencies. He has taught as an Adjunct Professor at the George Washington University Law School. He is a former member and Chairperson of the Rules of Professional Conduct Review Committee of the District of Columbia Bar, where he helped draft the ethics rules governing members of the bar. And Mr. Tycko is a member of the Board of Trustees of Studio Theatre, one of the D.C. area's top non-profit theaters.

Mr. Tycko is admitted to practice before the courts of the District of Columbia, Maryland and New York, as well as before numerous federal courts, including the Supreme Court, the Circuit Courts for the D.C. Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Seventh Circuit, Ninth Circuit, Eleventh Circuit and Federal Circuit, the District Courts for the District of Columbia and District of Maryland, the Southern District of New York, the Northern District of New York, the Western District of New York, and the Court of Federal Claims.



#### Education

Columbia University Law School, 1992

The Johns Hopkins University, 1989, with Honors

#### Bar Admissions

District of Columbia Maryland New York Supreme Court of the United States

#### Memberships

American Association for Justice (AAJ)

Public Justice

Taxpayers Against Fraud Education Fund (TAFEF)

#### Awards

Stone Scholar (all three years), Columbia Law School

Thomas E. Dewey Prize for Best Brief, Harlan Fiske Stone Moot Court Competition, Columbia Law School

Award of Litigation Excellence, CARECEN-The Central American Resource Center

Super Lawyers, 2012-current

Member of the D.C. Bar Leadership Academy



## Anna Haac

#### Partner

202.973.0900 ahaac@tzlegal.com

Anna C. Haac is a Partner in Tycko & Zavareei LLP's Washington, D.C. office. She focuses her practice on consumer protection class actions and whistleblower litigation. Her prior experience at Covington & Burling LLP, one of the nation's most prestigious defense-side law firms, gives her a unique advantage when representing plaintiffs against large companies in complex cases. Since arriving at Tycko & Zavareei LLP, Ms. Haac has represented consumers in a wide range of practice areas, including product liability, false labeling, deceptive and unfair trade practices, and predatory financial practices. Her whistleblower practice involves claims for fraud on federal and state governments across an equally broad spectrum of industries, including health care fraud, customs fraud, and government contracting fraud.

Ms. Haac has helped secure multimillion-dollar relief on behalf of the classes and whistleblowers she represents. Ms. Haac also serves as the D.C. Co-Chair of the National Association of Consumer Advocates and as Co-Chair of the Antitrust and Consumer Law Section Steering Committee of the D.C. Bar.

Ms. Haac earned her law degree *cum laude* from the University of Michigan Law School in 2006 and went on to clerk for the Honorable Catherine C. Blake of the United States District Court for the District of Maryland. Prior to law school, Ms. Haac graduated with a B.A. in political science with Highest Distinction from the Honors Program at the University of North Carolina at Chapel Hill.

Ms. Haac is a member of the District of Columbia and Maryland state bars. She is also admitted to the United States Court of Appeals for the Second, Third, and Fourth Circuits and the United States District Courts for the District of Columbia, District of Maryland, and the Eastern District of Michigan, among others.



#### Education

University of Michigan Law School, 2006, cum laude

University of North Carolina at Chapel Hill, 2002, Highest Honors

#### Bar Admissions

District of Columbia Maryland

#### Memberships

Antitrust & Consumer Protection Section of District of Columbia Bar, Co-Chair

National Association of Consumer Advocates, District of Columbia Co-Chair

Public Justice

#### Awards

Super Lawyers, Rising Star, 2015

#### Presentations & Publications

Discussion Leader, "Practical Ideas about Properly Framing the Issues and Educating the Court and Public in Filings Responding to Increasing Attacks on Class Action Settlements and Fees," Cambridge Forum on Plaintiffs' Class Action Litigation (October 2020)



# Annick M. Persinger

#### Partner

510.254.6808 apersinger@tzlegal.com

Annick M. Persinger leads Tycko & Zavareei LLP's California office as California's Managing Partner. While at Tycko & Zavareei LLP, Ms. Persinger has dedicated her practice to utilizing California's prohibitions against unfair competition and false advertising to advocate for consumers. Ms. Persinger has taken on financial institutions, companies that take advantage of consumers with deceptive advertising, tech companies that disregard user privacy, companies that sell defective products, and mortgage loan servicers. Ms. Persinger also represents whistleblowers who expose their employer's fraudulent practices.

Ms. Persinger graduated magna cum laude as a member of the Order of the Coif from the University of California, Hastings College of the Law in 2010. While in law school, Ms. Persinger served as a member of Hastings Women's Law Journal, and authored two published articles. In 2008, Ms. Persinger received an award for Best Oral Argument in the first year moot court competition. In 2007, Ms. Persinger graduated *cum laude* from the University of California, San Diego with a B.A. in Sociology, and minors in Law & Society and Psychology.

Following law school, Ms. Persinger worked as a legal research attorney for Judge John E. Munter in Complex Litigation at the San Francisco Superior Court.

Ms. Persinger served as an elected board member of the Bay Area Lawyers for Individual Freedom (BALIF) from 2017 to 2019, and as Co-Chair of BALIF from 2018 to 2019. During her term on the BALIF Board of Directors, Ms. Persinger advocated for LGBTQI community members with intersectional identities, and promoted anti-racism and antigenderism. Ms. Persinger now serves as a Steering Committee member for the Cambridge Forum on Plaintiffs' Food Fraud Litigation.



#### Education

University of California Hastings College of Law, 2010, magna cum laude, Order of the Coif

University of California San Diego, 2007, cum laude

#### Bar Admissions

California

#### Memberships

American Association for Justice

Plaintiffs' Food Fraud Litigation, 2020 Steering Committee Member

Public Justice

#### Awards

Super Lawyer, Rising Star 2020 UC Hastings, Best Oral Argument 2008



# Sabita J. Soneji

#### Partner

510.254.6808 ssoneji@tzlegal.com

In 20 years of practice, Sabita J. Soneji has developed extensive experience in litigation and legal policy at both the federal and state level and a passion for fighting consumer fraud. Now a Partner in Tycko & Zavareei LLP's Oakland office, she focuses on consumer protection class actions and whistleblower litigation. In addition to her success with novel Telephone Consumer Protection cases, False Claims Act cases involving insurance fraud, and deceptive and false advertising cases, Ms. Soneji serves in leadership on multi-district litigation against Juul, for its manufacture and marketing to youth of an addictive nicotine product. Ms. Soneji also successfully represents consumers harmed by massive data breaches and by corporate practices that collect and monetize user data without consent. She serves as head of the firm's Privacy and Data Breach Group.

Ms. Soneji began that work during her time with the United States Department of Justice, as Senior Counsel to the Assistant Attorney General. In that role, she oversaw civil and criminal prosecution of various forms of financial fraud that arose in the wake of the 2008 recession. For that work, Ms. Soneji partnered with other federal agencies, state attorneys' general, and consumer advocacy groups. Beyond that affirmative work, Ms. Soneji worked to defend various federal programs, including the Affordable Care Act in nationwide litigation.

Ms. Soneji has extensive civil litigation experience from her four years with international law firm, her work as an Assistant United States Attorney in the Northern District of California, and from serving as Deputy County Counsel for Santa Clara County, handling civil litigation on behalf of the County including regulatory, civil rights, and employment matters. She has successfully argued motions and conducted trials in both state and federal court and negotiated settlements in complex multi-party disputes.

Early in her career, Ms. Soneji clerked for the Honorable Gladys Kessler on the United States District Court for the District of Columbia s, during which she assisted the judge in overseeing the largest civil case in American history, United States v. Phillip Morris, et al., a civil RICO case brought against major tobacco manufacturers for fraud in the marketing, sale, and design of cigarettes. The opinion in that case paved the way for Congress to authorize FDA regulation of cigarettes.

Ms. Soneji is a graduate of the University of Houston, *summa cum laude*, with degrees in Math and Political Science, and Georgetown University Law Center, *magna cum laude*.



#### Education

Georgetown University Law Center, magna cum laude

University of Houston, summa cum laude

#### Bar Admissions

District of Columbia California Supreme Court of the United States

#### Memberships

Ninth Circuit Judicial Council Lawyer Representative for the Northern District of California, 2023-2025

Law360 Diversity & Inclusion Editorial Advisory Board Member, 2022-2023

American Association for Justice (AAJ)

Public Justice, 2022-2023 Member of the Board of Directors

Impact Fund

Taxpayers Against Fraud Education Fund (TAFEF)

#### Awards

Attorney General's Award 2014

#### Presentations & Publications

NITA Trial Skills Faculty 2010-present



# Kristen G. Simplicio

#### Partner

202.973.0900 ksimplicio@tzlegal.com

Kristen G. Simplicio has devoted her career to representing victims of false advertising and corporate fraud. Prior to joining Tycko & Zavareei LLP's D.C. office in 2020, she spent ten years at a boutique class action firm in California. While there, she successfully litigated over a dozen false advertising cases against manufacturers of a variety of consumer products, including olive oil, flushable wipes, beverages, and chocolate. In connection with this work, she helped to obtain millions of dollars in refunds to consumers, as well as changed practices.

In addition to her product labeling work, Ms. Simplicio has represented plaintiffs in a wide variety of areas. For example, she was the lead associate on RICO case on behalf of small business owners against 18 defendants in the credit card processing industry. In connection with that case, she obtained a preliminary injunction halting an illegal \$10 million debt collection scheme, and later, helped to secure refunds and changed practices for the victims. She has also represented victims of other debt collectors, as well as those harmed by unlawful background and credit reporting, including a pro bono matter performed in conjunction with the Lawyers' Committee for Civil Rights of the San Francisco Bay Area. Ms. Simplicio also worked on a lawsuit against government agencies, which were charging unconstitutional fines and fees in connection with toll collection.

Ms. Simplicio graduated *cum laude* from American University, Washington College of Law in 2007. She holds a bachelor's degree from McGill University. She began her legal career at the United States Department of Labor, where she advised on regulations pertaining to group health insurance plans. Before and during law school, Ms. Simplicio worked for other plaintiffs' law firms.

Ms. Simplicio serves as the D.C. Co-Chair of the National Association of Consumer Advocates. She is admitted to practice in California and the District of Columbia.



#### Education

American University, Washington College of Law, 2007, *cum laude* McGill University, 1999

#### Bar Admissions

California District of Columbia

#### Memberships

National Association of Consumer Advocates American Association for Justice Public Justice



## Renée Brooker

#### Partner

202.417.3664 reneebrooker@tzlegal.com

Bringing 30 years of practice, knowledge, and expertise as a former prosecutor in a senior leadership position at the United States Department of Justice, Renée Brooker is now representing whistleblowers. While at the Department of Justice for over two decades, Ms. Brooker was responsible for billions of dollars in recoveries under whistleblower laws. As an accomplished and experienced attorney, Ms. Brooker has advised and represented whistleblowers under the False Claims Act (FCA), the Anti-Kickback Statute and Stark Law, FIRREA (bank fraud, mail, and wire fraud), the Financial Institutions Anti-Fraud Enforcement Act (FIAFE), and the Whistleblower Programs of the SEC, the CFTC, and the IRS.

As Assistant Director within the Civil Division of the United States Department of Justice, Ms. Brooker was responsible for sizeable recoveries and successful judgments under the False Claims Act, FIRREA, and civil RICO in almost every industry: pharmaceutical, health care, defense, financial services, government procurement, small business, insurance, tobacco products, and higher education.

Ms. Brooker received her law degree in 1990 from Georgetown University Law Center, and a B.S. degree in 1987 from Temple University. After graduating from Georgetown, Ms. Brooker served as a Law Clerk to Judge Noël Kramer in the District of Columbia for one year before joining the United States Department of Education as an attorney. Ms. Brooker was hired as part of the enforcement response to Congressional investigations of fraud in federal student aid programs affecting consumers and taxpayers. Prior to joining Tycko & Zavareei LLP in 2020, Ms. Brooker worked at another prominent whistleblower firm where she advised and represented whistleblowers while expanding the firm's whistleblower practice. Ms. Brooker also served as a member of the United States Department of Justice-appointed Independent Corporate Compliance Monitor and Auditor for Volkswagen under its Plea Agreement and Consent Decree with the United States Department of Justice.



#### Education

Georgetown University Law Center, J.D. Temple University, B.S.

#### Bar Admissions

District of Columbia Pennsylvania

#### Memberships

Taxpayers Against Fraud Education Fund (TAFEF)

Board Member, Federal Bar Association Qui Tam Section

National Employment Lawyers Association (NELA)

#### Awards

Department of Justice Commendation Award for recovering billions of dollars under the Big Lender Initiative, 2016

Council of the Inspectors General on Integrity and Efficiency Award for Excellence for \$1.2 billion False Claims Act settlement with Wells Fargo, 2016

Department of Justice Award for "a record of outstanding actions and accomplishments," 2015

Attorney General's Award for Fraud Prevention, 2011

Department of Justice Award for prosecuting Big Tobacco under RICO, 2005



## Eva Gunasekera

#### Partner

202.417.3655 eva@tzlegal.com

Bringing 16 years of complex litigation experience practice, Eva Gunasekera, the former Senior Counsel for Health Care Fraud at the United States Department of Justice, is now representing whistleblowers. Ms. Gunasekera has spent the better part of her career enforcing the False Claims Act and the Stark and Anti-Kickback laws.

Highly strategic, Ms. Gunasekera has many notable successes under her belt, sizeable recoveries under the False Claims Act, and has held companies accountable for fraudulent conduct that harmed important government programs such as Medicare and Medicaid. With deep health care fraud expertise, she has investigated, litigated, and settled cases involving all federal health care programs (Medicare, Medicaid, TRICARE, FEHB). Ms. Gunasekera is an expert on analyzing complex health care data sets, including Medicare and Medicaid payment data and trends, to identify potentially fraudulent practices. She has enforced anti-fraud laws and represented whistleblowers across industries: pharmaceutical manufacturers, health care providers, hospitals, physicians, physician groups, laboratories, managed care, pharmacies, hospice and nursing home providers, financial institutions, government suppliers, automotive, small businesses, and defense contractors. Many of her investigations involved parallel criminal proceedings and compliance and whistleblower programs of health care organizations, including those subjected to Corporate Integrity Agreements and oversight by Independent Review Organizations, as required by the U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG).

After graduating with her Master's in Public Administration from Ohio University, and from Georgetown University Law Center, Ms. Gunasekera practiced law at two international law firms. She acted as second chair during administrative trials and handled complex commercial litigation. Ms. Gunasekera also played a significant role on the team that represented the Enron Creditors Recovery Corp in the bankruptcy proceeding, successfully returning billions of dollars to creditors in the wake of the Enron scandal. Further, Ms. Gunasekera represented clients in pro bono matters, including the successful defense of an individual seeking asylum and as guardian ad litem for three children.



#### Education

Georgetown University Law Center, J.D., 2004 Ohio University, M.A., 2001 Ohio University, B.A, 2000

#### Bar Admissions

District of Columbia

Ohio

#### Memberships

Taxpayers Against Fraud Education Fund (TAFEF)

Federal Bar Association Qui Tam Section

#### Presentations & Publications

"Whistleblower Rewards 101" – Scottsdale (Arizona) Bar Association (March 9, 2021)

"Should the False Claims Act be Amended to Define Falsity?" - Federal Bar Association, Qui Tam Section (February 17, 2021)

Law review article: False Claims Act, the opioid crisis, whistleblowing, Emory University Law School, February 26, 2019



## Allison W. Parr

#### Associate

202.973.0900 aparr@tzlegal.com

Prior to joining Tycko & Zavareei LLP in 2021, Allison W. Parr was an associate in the Washington, D.C. office of Mayer Brown LLP, where she represented corporations in complex commercial litigation, including cases involving unfair competition and false advertising claims. Previously, Ms. Parr was a litigation associate in the New York office of Kramer Levin Naftalis & Frankel LLP, where she maintained an active pro bono practice in LGBTQ civil rights.

Ms. Parr graduated from the Georgetown University Law Center in 2018, where she served as the Articles and Notes Editor for the Food and Drug Law Journal. During law school, Ms. Parr externed for the Commercial Litigation Branch, Fraud Section of the Department of Justice, where she assisted with cases involving allegations of fraud against the government. Ms. Parr received her Bachelor of Music from the Peabody Institute of the Johns Hopkins University in 2013.

Ms. Parr is admitted to practice in New York and the District of Columbia.



#### Education

Georgetown University Law Center, 2018

John Hopkins University, 2013, with High Honors

#### Bar Admissions

New York District of Columbia

#### Memberships

Public Justice

#### Presentations & Publications

Agribusiness and Antibiotics: A Market-Based Solution, 73 Food & Drug L.J. 338 (2018)



## Lauren Kuhlik

#### Associate

202.973.0900 lkuhlik@tzlegal.com

Prior to joining Tycko & Zavareei LLP in 2021, Lauren Kuhlik was a fellow at the National Prison Project of the American Civil Liberties Union, where she engaged in litigation and other advocacy to stop unconstitutional and illegal practices by prison and jail administrators and ICE. She focused on improving conditions of confinement for pregnant and postpartum people, as well as fighting to eliminate the inhumane practice of solitary confinement. During the COVID-19 crisis, Ms. Kuhlik maintained an extensive habeas practice seeking to secure the release of detained individuals with medical vulnerabilities.

Ms. Kuhlik graduated *cum laude* from Harvard Law School in 2017. She also received a Masters in Public Health from the Harvard T.H. Chan School of Public Health in 2017. Following law school, Ms. Kuhlik clerked for the Honorable Stephen Glickman of the District of Columbia Court of Appeals. She has published articles regarding the treatment of pregnant incarcerated people in the Harvard Law and Policy Review and the Harvard Civil Rights-Civil Liberties Law Review. Ms. Kuhlik has also published about gender and incarceration in USA Today and Ms. Magazine, among others.



#### Education

Harvard Law School, 2017, cum laude Harvard T.H. Chan School of Public Health, M.P.H., 2017

Wesleyan University, BA in Philosophy with Honors, 2011

#### Bar Admissions

District of Columbia

Virginia

#### Memberships

Public Justice

#### Publications & Presentations

National Abortion Federation Annual Meeting (2021)

Pregnancy, Systematic Disregard and Degradation, and Carceral Institutions, Harvard Law & Policy Review (2020)

Harvard Law & Policy Review Fall Symposium (2019)

Society of Family Planning Annual Meeting (2019)

George Mason University Law School Civil Rights Law Journal Symposium (2019)

Pregnancy Behind Bars: The Constitutional Argument for Reproductive Healthcare Access in Prison, Harvard Civil Rights & Civil Liberties Law Review (2017)



## Leora N. Friedman

#### Associate

202.417.3669 lfriedman@tzlegal.com

Leora Friedman received her J.D. from Georgetown University Law Center in 2020.

At Georgetown Law, Leora obtained diverse legal experience through experiential courses led by the O'Neill Institute for National and Global Health Law and by the Institute for Constitutional Advocacy and Protection. In addition, she authored papers proposing new legal frameworks for addressing the negative health impacts of electronic cigarettes and improving pandemic preparedness through writing-intensive coursework.

During law school, Leora also served as an intern for the Department of Justice's Office of Vaccine Litigation and its Consumer Protection Branch. She was an Executive Editor for the Georgetown Environmental Law Review, which published her note "Recommending Judicial Reconstruction of Title VI to Curb Environmental Racism: A Recklessness-Based Theory of Discriminatory Intent."

Previously, Leora was the Rockefeller Foundation's Princeton Project 55 Fellow from 2014-2015 and, thereafter, aided international health advocacy campaigns at Global Health Strategies.

She graduated from Princeton University with an A.B. in Politics in 2014.



#### Education

Georgetown University Law Center, 2020

Princeton University, 2014

#### Bar Admissions

District of Columbia

#### Memberships

Public Justice

#### Publications

Recommending Judicial Reconstruction of Title VI to Curb Environmental Racism: A Recklessness-Based Theory of Discriminatory Intent, 32 GEO. ENV'T L. REV. 421 (2020)



# **Spencer Hughes**

#### Associate

202.973.0900 shughes@tzlegal.com

Spencer Hughes is an associate in the Washington, D.C. office, where he focuses on representing consumers in class actions against corporations.

Before joining Tycko & Zavareei LLP, Mr. Hughes was an associate at Kirkland & Ellis LLP, a top defense-side law firm. He gained invaluable experience in complex consumer protection cases and learned the strategies of defense teams in these matters. While at Kirkland & Ellis, Mr. Hughes maintained an active pro bono practice in trial-level and appellate courts, and he received the firm's Pro Bono Service Award for four consecutive years.

Mr. Hughes earned his Juris Doctor from Duke University School of Law in 2017, where he was an editor of the *Duke Law Journal*. After graduation, he clerked for the Honorable Gerald Bard Tjoflat of the United States Court of Appeals for the Eleventh Circuit.

Mr. Hughes graduated *cum laude* from Iowa State University in 2014, earning a Bachelor of Arts in political science and speech communication. He served as the university's Student Body President for the 2013-14 academic year.



#### Education

Duke University School of Law, 2017 Iowa State University, 2014, cum laude

#### Bar Admissions

District of Columbia Supreme Court of the United States

#### Memberships

American Constitution Society Public Justice



## Gemma Seidita

#### Associate

202.973.0900 gseidita@tzlegal.com

Gemma Seidita is an associate in the Washington, D.C. office where she focuses on civil rights cases and advocating for whistleblowers and consumers.

Prior to joining Tycko & Zavareei LLP in 2022, Ms. Seidita was an associate in the Washington, D.C. office of Cooley LLP, where she represented clients in complex commercial litigation and investigations, including cases involving securities, trade secret, and unfair competition claims. At Cooley, Ms. Seidita maintained an active pro bono practice in civil rights and immigration areas. Ms. Seidita was a member of the trial team in the historic federal *Sines v. Kessler* litigation where white supremacists were put on trial for their conspiratorial actions in planning and committing violence at the Unite the Right rally in Charlottesville, Virginia.

Ms. Seidita graduated from Duke University School of Law in 2018 where she earned a J.D. and an LLM in international and comparative law. While in law school, she served as a Research Editor for the Duke Environmental Law and Policy Forum. Ms. Seidita received her Bachelor of Arts in Foreign Affairs from the University of Virginia in 2015.



#### Education

Duke University School of Law, 2018, cum laude

University of Virginia, 2015, with Distinction

#### **Bar Admissions**

California District of Columbia Massachusetts

#### Memberships

Public Justice



# Jaclyn S. Tayabji

#### Associate

202.973.0900 jtayabji@tzlegal.com

Jaclyn Tayabji received her J.D. magna cum laude from Boston University School of Law in 2021. While in law school, Jaclyn embraced experiential learning opportunities and consistently utilized her legal skills to promote the public interest. Jaclyn completed a legal internship in the Consumer Protection Division of the Massachusetts Attorney General's Office and a judicial externship with the Honorable Vickie L. Henry on the Massachusetts Appeals Court. As a Student Attorney in the Access to Justice Civil Litigation Clinic, Jaclyn represented low-income clients in various civil disputes, including defending tenants in summary process evictions and facilitating discovery production in a federal employment discrimination case.

In law school, Jaclyn served as an Editor for the *Boston University Law Review* and was elected to leadership positions in the Middle Eastern & South Asian Law Students Association, the International Law Society, and the Public Interest Project. Jaclyn was also selected to serve on the Public Interest Committee alongside fellow students, faculty, and staff to review the policies and programs related to public service offerings at Boston University School of Law and to advocate for institutional resources.

Jaclyn received her B.A. in International Studies and African Studies from Emory University in 2016. Prior to law school, Jaclyn served with the Peace Corps in Malawi and subsequently worked as a Recovery Coach through the inaugural AmeriCorps-Police Assisted Addiction & Recovery Initiative program.



#### Education

Boston University School of Law, 2021, magna cum laude Emory University, 2016

#### Bar Admissions

District of Columbia

#### Memberships

Public Justice

#### Awards

Public Interest Scholar, Boston University School of Law

Sylvia Beinecke Robinson Award, Boston University School of Law

Paul J. Liacos Scholar, Boston University School of Law

G. Joseph Tauro Distinguished Scholar, Boston University School of Law

Deans Award (Torts), Boston University School of Law

#### Presentations & Publications

Rehabilitation Under the Rehabilitation Act: The Case for Medication-Assisted Treatment in Federal Correctional Facilities, 101 B.U. L. REV. ONLINE 79 (2021)

Boston University Law Review, Editor



## David W. Lawler

#### Of Counsel

202.973.0900 dlawler@tzlegal.com

Mr. Lawler joined Tycko & Zavareei LLP in January 2012. He has over twenty years of commercial litigation experience, including an expertise in eDiscovery and complex case management. At the firm Mr. Lawler has represented consumers in a numerous practice areas, including product liability, false labeling, deceptive and unfair trade practices, and antitrust class actions litigation.

Before joining Tycko & Zavareei LLP, Mr. Lawler was an associate in the litigation departments at McKenna & Cuneo LLP and Swidler Berlin Shereff Friedman LLP.

Among Mr. Lawler's career achievements include the co-drafting of appellate briefs which resulted in rare reversal and entry of judgment in favor of client, US Court of Appeals for the Fourth Circuit.

Mr. Lawler is a member of the District of Columbia Bar, as well as numerous federal courts.



#### Education

Creighton University School of Law, 1997

University of California, Berkeley School of Law, 1989

Bar Admissions

District of Columbia

#### Memberships

American Association for Justice Public Justice



## F. Peter Silva II

#### Of Counsel

202.973.0900 psilva@tzlegal.com

Peter Silva is a zealous advocate for consumers, workers, and individuals whose rights have been violated by the government, employers, and financial institutions. Over the last decade, Peter has successfully represented clients in civil rights, consumer protection, and foreclosure defense cases in negotiations, mediations, arbitrations, and at trial in state and federal courts and before various administrative agencies.

Prior to joining Tycko & Zavareei LLP, Peter represented individuals and small businesses as a Partner with Gowen Silva & Winograd, PLLC. Peter's work on behalf of Maryland, D.C., and Virginia homeowners has prevented dozens of foreclosures through loan modifications, settlements, and litigation. Peter not only defends foreclosures, but countersues for violations of state and federal lending and servicing laws. Peter has successful brought and defended lawsuits against America's biggest banks and mortgage servicers including Wells Fargo, Bank of America, U.S. Bank, Fannie Mae, Freddie Mac, Mr. Cooper/Nationstar Mortgage, Bayview Loan Servicing, and Ocwen Loan Servicing. Through aggressive litigation and creative settlement solutions, Peter has obtained millions of dollars in damages and savings for his clients including principal and interest reductions, write-downs, and deficiency waivers. Peter's extensive knowledge of the foreclosure and loan modification processes, mortgage servicing industry and applicable state and federal laws including the Real Estate Settlement Procedures Act (RESPA) and Truth-in-Lending (TILA) allows him to provide clients with upfront and straightforward assessments of their options so that they can make an informed decision.

Peter has worked with local, state, and federal governments and non-profit entities to strengthen legal protections of consumers. Peter is a member of the National Association of Consumer Advocates.

At the beginning of his legal career, Peter worked extensively in the civil rights field as an attorney fellow for the Washington Lawyers' Committee for Civil Rights and Urban Affairs, and a law clerk with the Equal Employment Opportunity Commission and the civil rights interest group, People for the American Way.



#### Education

University of Miami, School of Law, 2010 San Diego State University, 2007

#### Bar Admissions

Virginia District of Columbia Maryland

#### Memberships

National Association of Consumer Advocates

Public Justice

#### Presentations & Publications

"The Tactical Deployment of Regulation X: Loss Mitigation in Judicial, Quasi-Judicial, and Nonjudicial States," National Association of Consumer Advocates (February 11, 2021)

"Foreclosures: What You Don't Know Will Hurt You!" National Association for the Advancement of Colored People



# Wesley M. Griffith

#### Of Counsel

510.254.6808 wgriffith@tzlegal.com

Mr. Griffith is a graduate of the University of California, Berkeley and the University of Chicago Law School. After law school, Mr. Griffith spent a decade working at two of the nation's top defense firms, where he represented some of the world's largest companies in class actions, complex litigation, and regulatory matters.

Mr. Griffith now uses those same skills to advocate on behalf of his consumer clients. He is dedicated to tenaciously advancing his clients' interests through all phases of litigation, including trial and on appeal.

While Mr. Griffith's preference is always to litigate, he also knows that being an effective advocate sometimes means settling. Mr. Griffith has been involved with dozens of significant settlements over the course of his career, including settlements valued at over \$100 million, and he has defended those settlements in parallel actions and on appeal.

Mr. Griffith maintains an active pro bono practice representing clients in civil rights cases. He serves on the pro bono panels for the Ninth Circuit Court of Appeal and the Eastern District of California, and was recognized in 2021 for his pro bono service to the Eastern District.

Mr. Griffith is a member of the California Bar and is admitted to practice in the U.S. District Courts for the Central, Eastern, Northern and Southern Districts of California, as well as the U.S. Judicial Panel on Multidistrict Litigation and the U.S. Courts of Appeal for the Second, Ninth, and Eleventh Circuits.

Mr. Griffith is a member of the Advisory Board of the Legal Aid Foundation of Los Angeles, and he has been repeatedly recognized for his mentorship to junior attorneys.

When not practicing law, Mr. Griffith enjoys spending time with his toddler and wife and hiking in the Sierras with his dog.



#### Education

University of Chicago Law School, 2012

University of California, Berkeley, 2007, with Honors and Distinction

#### Bar Admissions

California Supreme Court of the United States

#### Memberships

Pro Bono Panel, Ninth Circuit Court of Appeal

Pro Bono Panel, U.S. District Court for the Eastern District of California

Legal Aid Foundation of Los Angeles, Advisory Board Member

Public Justice

#### Awards

2021 Honoree, U.S. District Court for the Eastern District of California Night to Honor Service

2020 and 2021 Mentorship Award, Jenner & Block LLP



## Shana Khader

#### Of Counsel

202.973.0900 skhader@tzlegal.com

Shana Khader is passionate about using the legal system creatively to challenge abuses of power and to seek justice on behalf of traditionally marginalized communities and poor people–even in hard cases. In the past several years, she has specialized in representing low-income immigrant workers in Texas. As Senior Managing Attorney at the Equal Justice Center and as Director of Legal Services at Workers Defense Project, Ms. Khader represented workers in challenging abusive employment practices through class and individual litigation, policy advocacy, and community organizing. She also has extensive experience working with survivors of sexual harassment and assault at work. She has obtained favorable decisions and verdicts on behalf of her clients in state and federal court.

Prior to moving to Texas, Ms. Khader served as a Kirkland & Ellis Public Service Fellow at the New York Legal Assistance Group, where she represented low-income New Yorkers who were victimized by unscrupulous debt collectors in courts throughout the city.

Ms. Khader graduated with academic honors from Columbia Law School. She served as a judicial law clerk to the Honorable Debra C. Freeman, Magistrate Judge in the Southern District of New York.

Ms. Khader served as a member of the Dallas Civil Service Board, has served as a board member of the DFW chapter of the National Employment Lawyers Association, and is an alumna of the Latino Center for Leadership Development Leadership Academy. She is fluent in Spanish.



#### Education

Columbia University School of Law, 2011, *James Kent Scholar*Occidental College, 2005, *magna cum laude* 

Bar Admissions

New York

Texas

#### Memberships

American Association for Justice Public Justice

#### Awards

Kirkland & Ellis New York City Public Service Fellow

Hamilton Fellow

Pro Bono Honors

#### Presentations & Publications

"Timekeeping and Teleworking in the Era of COVID," Texas Employment Lawyers Association Spring Seminar, (Apr. 2021)

"Taking the Sex out of Sexual Harassment: Why the 'Equal Opportunity Harasser' Defense Under Title VII Should be Eliminated." *Columbia Gender and Sexuality Law Journal Online*, (Spring 2011)



# Glenn Chappell

#### Of Counsel

202.973.0900 gchappell@tzlegal.com

Glenn Chappell is Of Counsel in the Washington, D.C. office. Prior to joining Tycko & Zavareei LLP, he was an associate in the Washington, D.C. office of Gibson, Dunn & Crutcher LLP, one of the nation's most prestigious defense-side firms. During his time at Gibson Dunn, Mr. Chappell represented corporations in complex litigation at the trial and appellate levels, including the United States Supreme Court. He also maintained an active pro bono practice that focused on police and sentencing reform.

Mr. Chappell graduated *summa cum laude* from Duke University School of Law in 2017, where he served as Managing Editor of the *Duke Law Journal* and Senior Research Editor of the *Duke Law & Technology Review*. While in law school, he dedicated more than 450 hours to pro bono work.

After graduating law school, Mr. Chappell clerked for the Honorable Gerald Bard Tjoflat of the United States Court of Appeals for the Eleventh Circuit and the Honorable Anthony J. Trenga of the United States District Court for the Eastern District of Virginia. Before law school, he worked as a manager in the manufacturing industry. He graduated with honors from Saint Leo University, earning a Bachelor of Arts in Business Administration. His legal scholarship has appeared in multiple publications, including the *Duke Law Journal* and the *University of Richmond Law Review*.



#### Education

Duke University School of Law, 2017, summa cum laude, Order of the Coif Saint Leo University, 2011, cum laude

#### Bar Admissions

District of Columbia Virginia Supreme Court of the United States

#### Memberships

Order of the Coif Virginia Equality Bar Association American Constitution Society Virginia Bar Association Public Justice

#### **Publications**

The Historical Case for Constitutional "Concepts", 53 UNIVERSITY OF RICHMOND LAW REVIEW 373 (2019)

Health Care's Other "Big Deal": Direct Primary Care Regulation in Contemporary American Health Law, 66 DUKE LAW JOURNAL 1331 (2017)

Seeking Rights, Not Rent: How Litigation Finance Can Help Break Copyright's Precedent Gridlock, 15 DUKE LAW & TECHNOLOGY REVIEW 269 (2017)



## **Cort Carlson**

#### Fellow

510.254.6808 ccarlson@tzlegal.com

Cort Carlson is a Public Interest Fellow in the Oakland, California office. Mr. Carlson received his J.D. from University of California, Berkeley, School of Law in 2022, with a Public Interest & Social Justice Certificate. During law school, Mr. Carlson immersed himself in public interest scholarship and advocacy. Mr. Carlson completed a judicial externship with the Honorable Kimberly J. Mueller, Chief United States District Judge for the Eastern District of California, worked on whistleblower cases as a law clerk for a public interest plaintiff-side law firm in the Bay Area, and worked on cases involving unsafe and unfair housing conditions as an extern at the San Francisco City Attorney's Office. Mr. Carlson was twice elected to editor positions on the Ecology Law Quarterly, one of the nation's leading environmental law reviews, and served on the Berkeley Technology and Law Journal. Outside of school, Mr. Carlson served as a student advocate for incarcerated youth in collaboration with the Contra Costa County Public Defender and was a student researcher for the Brady Center to Prevent Gun Violence. Mr. Carlson also participated in a state and local impact litigation practicum in which he worked alongside current and former government attorneys on justice-oriented affirmative litigation projects.

Mr. Carlson received his B.A. Summa Cum Laude in Anthropology and English with a minor in Political Science from The George Washington University in 2019. Mr. Carlson traces his passion for public interest advocacy to early experiences working on issues that uniquely affect vulnerable communities, including poverty, incarceration, environmental harm, and personal data protection. Prior to law school, Mr. Carlson served as an academic tutor to persons pursuing higher education while incarcerated at Prince George's County Correctional Center in Maryland. Mr. Carlson also conducted research on people's perceptions and management of privacy on their cellular devices in collaboration with the GW Anthropology Department and the Smithsonian Institution.



#### Education

UC Berkeley School of the Law, 2022 The George Washington University, 2019, *summa cum laude* 

#### Bar Admissions

Sat for California Bar Examination, July 2022 (results pending)

#### Memberships

Public Justice

#### Awards

Public Interest & Social Justice Certificate, University of California, Berkeley, School of Law

Hart Award for Outstanding Academic Achievement, The George Washington University



# **Schuyler Standley**

#### Fellow

202.973.0900 sstandley@tzlegal.com

Schuyler Standley is the 2022-2024 Public Interest Fellow at Tycko & Zavareei LLP. Schuyler received her J.D. from the University of California, Berkeley School of Law in 2021. While in law school, Schuyler embraced experiential learning opportunities and consistently utilized her legal skills to promote the public interest. Before her fellowship, Schuyler clerked for the Honorable Katherine M. Menendez of the United States District Court for the District of Minnesota. She also served as a judicial fellow for the Honorable Joseph C. Spero, Chief Magistrate Judge of the United States District Court for the Northern District of California.

While in law school, Ms. Standley focused on experiential learning and pro bono work. She spent three semesters in the Samuelson Law, Technology, and Public Policy Clinic, where she assisted with litigation at the intersection of technology and civil rights.



Education
UC Berkeley School of the Law, 2021
American University, 2016

Bar Admissions Illinois

Memberships Public Justice



## Dia Rasinariu

#### Associate

202.973.0900 drasinariu@tzlegal.com

Dia Rasinariu graduated *cum laude* from Harvard Law School in 2016. While in law school, Ms. Rasinariu served as an Executive Editor of the *Harvard Law Review*. She was also a member of HLS Lambda. Following law school, Ms. Rasinariu clerked for the Honorable Diana Gribbon Motz on the United States Court of Appeals for the Fourth Circuit. Ms. Rasinariu earned her Bachelor of Arts, with distinction, from Cornell University in 2011, with majors in Government and in Economics.

Prior to joining Tycko & Zavareei LLP in 2021, Ms. Rasinariu was a litigation associate in the Washington, D.C. office of Jones Day. Ms. Rasinariu maintained an active pro bono practice, representing clients on civil rights, asylum, and domestic violence matters.

Ms. Rasinariu is a member of the District of Columbia and Illinois state bars. She is also admitted to practice before the United States District Court for the District of Maryland and the United States Courts of Appeals for the Fourth and Sixth Circuits.



Education
Harvard Law School, 2016
cum laude
Cornell University, 2011

Bar Admissions
Illinois

District of Columbia

with distinction

Memberships Public Justice

Awards

Super Lawyers, Rising Star 2020

#### JEFFREY D. KALIEL PARTNER

Jeffrey Kaliel earned his law degree from Yale Law School in 2005. Mr. Kaliel graduated from Amherst College summa cum laude in 2000 with a degree in Political Science. He spent one year studying Philosophy at Robinson College, Cambridge University, England.

Mr. Kaliel has substantial class action experience. He has been appointed Class Counsel in numerous actions and has served as co-counsel in numerous other class actions. In those cases, Mr. Kaliel has defended several dispositive motions, engaged in data-intensive discovery and worked extensively with economics and information technology experts. Mr. Kaliel has also successfully resolved numerous class actions by settlement, resulting in relief for millions of class members. Mr. Kaliel is actively litigating several national class action cases, including several actions against financial services entities.

Prior to joining Tycko & Zavareei, Mr. Kaliel was in the Honors Program at the Department of Homeland Security, where he worked on some the Department's appellate litigation. Mr. Kaliel also helped investigate the DHS response to Hurricane Katrina in preparation for a Congressional inquiry.

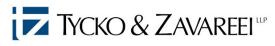
Mr. Kaliel has also served as a Special Assistant US Attorney in the Southern District of California, prosecuting drug and border crimes.

In 2008, Mr. Kaliel worked in Namibia with Lawyers Without Borders on the observation of a 400-defendant treason trial arising from a 1998 armed rebellion.

Mr. Kaliel is a former Staff Sergeant in the Army Reserve and a veteran of the second Iraq war, having served in Iraq in 2003. His publications include contributions to Homeland Security Today and American Bar Association's Homeland Security Handbook.

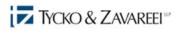
Mr. Kaliel is admitted to practice in California and Washington, DC. He is also admitted to the U.S. District Court for the District of Columbia, the Southern, Central, and Northern Districts of California, and the Northern District of Illinois.

# EXHIBIT 2



# Tycko & Zavareei LLP Lodestar

Professional	Title	<b>Total Hours</b>	<b>Hourly Rate</b>	Lodestar
Hassan Zavareei	Partner	840.1	\$ 1,057.00	\$ 887,985.70
Anna Haac	Partner	971.6	\$ 878.00	\$ 853,064.80
Jeffrey Kaliel	Partner	357.3	\$ 878.00	\$ 313,709.40
Shana Khader	Of Counsel	134.1	\$ 878.00	\$ 117,739.80
David Lawler	Of Counsel	194.1	\$ 450.00	\$ 87,345.00
Dia Rasinariu	Associate	210.1	\$ 777.00	\$ 163,247.70
Cort Carlson	Fellow	140.4	\$ 437.00	\$ 61,354.80
Aaron McReynolds	Paralegal	166.9	\$ 239.00	\$ 39,889.10
Amy Berkowitz	Paralegal	9.6	\$ 239.00	\$ 2,294.40
Connor Rowe	Paralegal	0.3	\$ 239.00	\$ 71.70
Dana Gillis	Paralegal	2.1	\$ 239.00	\$ 501.90
Emma Bass	Paralegal	1.6	\$ 239.00	\$ 382.40
Emma Schilp	Paralegal	0.8	\$ 239.00	\$ 191.20
Genna Wolinsky	Paralegal	22.4	\$ 239.00	\$ 5,353.60
James Morrison	Paralegal	2.6	\$ 239.00	\$ 621.40
Karen Ressue	Paralegal	2.4	\$ 239.00	\$ 573.60
Matthew Folkerts	Paralegal	30.1	\$ 239.00	\$ 7,193.90
Maura Dunn	Paralegal	16.7	\$ 239.00	\$ 3,991.30
Mia Goschalk	Paralegal	21.7	\$ 239.00	\$ 5,186.30
Nathan Laporte	Paralegal	12.5	\$ 239.00	\$ 2,987.50
Nicole Porzenheim	Paralegal	15.2	\$ 239.00	\$ 3,632.80
Sydney Teng	Paralegal	13.3	\$ 239.00	\$ 3,178.70
Allegra Lubar	Legal Assistant	9.6	\$ 239.00	\$ 2,294.40
Stephanie Ricker	Legal Assistant	0.4	\$ 239.00	\$ 95.60
TOTAL		3175.9		\$2,562,887.00



## Tycko & Zavareei LLP Time Entries

77. 1	D 4		D
Timekeeper	Date		Description
Aaron McReynolds	5/18/2021	0.6	Pulling scheduling/calendar orders for Hassan
Aaron McReynolds	5/24/2021	0.1	Saving Written Discovery Responses to NetDocs.
Aaron McReynolds	6/15/2021	0.3	Locating client emails for Hassan.
Aaron McReynolds	6/15/2021	0.1	Saving copy of sent letter to NetDocs.
Aaron McReynolds	6/16/2021	0.4	Searching for most recent complaint for Hassan.
Aaron McReynolds	6/22/2021	0.6	Finalizing and filing Joint Request for Supplemental Calendar Order.
Aaron McReynolds	6/30/2021	0.5	Finalizing and filing Consent Motion for Dia, serving Proposed Order on Judge's Chambers.
Aaron McReynolds	7/14/2021	0.4	Saving/Circulating CM/ECF Filings and Calendaring Deadlines.
Aaron McReynolds	8/13/2021	0.1	Saving Draft Letter to NetDocs for Anna.
Aaron McReynolds	8/16/2021	0.4	Finalizing and serving discovery deficiency letter for Hassan and Dia.
Aaron McReynolds	8/24/2021	0.2	Saving discovery requests and corresponding drafts to NetDocs.
Aaron McReynolds	9/3/2021	0.2	Finalizing 30(b)(6) Deposition Notice for Dia.
Aaron McReynolds	9/3/2021	0.2	Researching PHV Rules for Dia.
Aaron McReynolds	9/3/2021	0.2	Saving Discovery Requests to NetDocuments.
Aaron McReynolds	9/9/2021	0.1	Saving W-9 to NetDocs.
Aaron McReynolds	9/10/2021	0.1	Saving Deposition Transcript to NetDocs.
Aaron McReynolds	9/13/2021	0.1	Updating Client Information.
Aaron McReynolds	9/14/2021	0.4	Saving Production and Letter to NetDocs and the U:Drive.
Aaron McReynolds	9/15/2021	0.2	Saving Discovery Responses to NetDocs.
Aaron McReynolds	9/17/2021	0.2	Pulling Bankruptcy Docket Documents for Anna.
Aaron McReynolds	9/17/2021	0.2	Saving Interrogatory Verifications to NetDocs.
Aaron McReynolds	9/22/2021	0.1	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	9/30/2021	0.1	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	10/1/2021	0.3	Calendaring Motion Response and Reply Deadlines for Dia.
Aaron McReynolds	10/8/2021	0.1	Saving Subpoena to NetDocs file for Anna.
			Finalizing and sending letter to Opposing Counsel regarding discovery deficiencies on behalf of
Aaron McReynolds	10/13/2021	0.4	Hassan, saving documents to NetDocs.
Aaron McReynolds	10/15/2021	0.2	Circulating 30(b)(6) Deposition Date.
		*	Work on Opposition to Motion for Class Action Trial Plan (Motion to Bifurcate Discovery):
			Finalizing and formatting brief, composing and finalizing exhibit declaration, incorporating edits
Aaron McReynolds	10/21/2021	4.4	for Dia and Anna, highlighting and finalizing exhibit, and filling document.
Aaron McReynolds	10/25/2021	0.1	Saving Letter to NetDocs.
Aaron McReynolds	10/27/2021	0.4	Downloading/Circulating Fifth Third's Eighth Production, Organizing on Drive.
Aaron McReynolds	10/29/2021	0.5	Compiling Native Files on Sharefile to Send to Expert for Anna.
Aaron McReynolds	11/1/2021	0.2	Saving RFPs and Interrogatories to NetDocs for Anna.
Aaron McReynolds	11/1/2021	0.3	Saving Production 6 for Anna, updating Production Log.
Aaron McReynolds	11/1/2021	0.2	Updating Centerbase Record
Auton wereynolds	11/1/2021	0.2	Correspondence with Dia regarding 30(b)(6) Deposition, Updating Calendar Event Regarding
Aaron McReynolds	11/2/2021	0.3	Same.
Aaron McReynolds	11/2/2021	0.3	Saving Requests for Production and Interrogatories to NetDocs for Anna.
Aaron McReynolds	11/2/2021	0.2	Booking Veritext for 30(b)(6) Deposition for Dia and Co-Counsel.
Aaron McReynolds	11/2/2021	0.4	Saving Production 9 for Anna and Dia.
	11/2/2021	0.3	Circulating Exhibit Sharing Training to Co-Counsel and Dia.
Aaron McReynolds	11/2/2021	0.2	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	11/4/2021	0.1	Saving Hit Report Spreadsheets to NetDocs for Anna.
Aaron McReynolds			Saving Discovery Correspondence to NetDocs.
Aaron McReynolds	11/16/2021	0.1	Saving Discovery Correspondence to NetDocs. Saving/Formatting Productions 10 and 11, Creating Sharefile Link for Expert.
Aaron McReynolds	11/16/2021	0.4	
Aaron McReynolds	11/17/2021	0.3	Downloading and compiling Deposition Transcript for Dia, Hassan, and Anna.
A M . D 1 1	11/20/2021	0.6	Downloading and compiling Defendant's 12th Production, updating Production Log, and sending
Aaron McReynolds	11/29/2021	0.6	files to Disco for David and Anna.  Saving Fifth Third's Counter Keywords to NetDocs.
Aaron McReynolds	11/29/2021	0.1	·
M.B. 11	10/1/2021	0.2	Saving Letter from Opposing Counsel Regarding Second Amended Answer to Consolidated
Aaron McReynolds	12/1/2021	0.2	Class Action Complaint
Aaron McReynolds	12/6/2021	0.3	Saving 13th Production to the U:Drive for Anna, updating Production Log.
Aaron McReynolds	12/9/2021	0.1	Saving Letter Correspondence to NetDocs for Anna.
			Discrepa the discrepa 1/1 to the Lillings I indetend the discrept on Leaster Anna and Disc
Aaron McReynolds	12/9/2021	0.4	Saving Production 14 to the U:Drive, Updating Production Log for Anna and Dia.
Aaron McReynolds Aaron McReynolds Aaron McReynolds	12/9/2021 12/9/2021 12/13/2021	0.4 0.4 0.5	Sending Recent Productions to Disco Rep for Anna and Dia.  Compiling Defendant Productions and Sending to DISCO Representative.

Timekeeper	Date	Time	Description
A 3 & D 11	10/10/0001	0.1	Continue Amended Consultant and Decrease to Division Edit I and the National Consultant and Cons
Aaron McReynolds	12/13/2021	0.1	Saving Amended Supplemental Responses to Plaintiffs 5th Interrogatories to NetDocs for Anna.
	10/14/0001	0.5	Saving 15th Production to U:Drive, Updating Production Log, and Sending Production to DISCO
Aaron McReynolds	12/14/2021	0.5	Rep for Anna.
A M - D 1.1-	12/14/2021	0.2	Saning/Circulating CM/ECE Eilings Bassaching Level Bulgs for Betantial Operation Deadling
Aaron McReynolds	12/14/2021	0.2	Saving/Circulating CM/ECF Filings, Researching Local Rules for Potential Opposition Deadline.
A M.D. 11	12/15/2021	0.4	Correspondence with DISCO representative regarding uploading of Productions 1 and 3, setting
Aaron McReynolds	12/15/2021	0.4	up onboarding call for Dia and Anna.
Aaron McReynolds	12/15/2021	0.1	Saving Subpoena to NetDocs for Anna.
. M.D. 11	10/15/0001	0.0	Saving Production 16 to the U:Drive, updating Production Log, and Sending Production to
Aaron McReynolds	12/15/2021	0.8	DISCO Rep.
Aaron McReynolds	12/15/2021	0.2	Adding Co-Counsel to DISCO platform with DISCO representative.
Aaron McReynolds	12/15/2021	0.3	Pulling Information on Third Production for Anna.
Aaron McReynolds	12/16/2021	0.1	Saving Email Correspondence to NetDocs.
Aaron McReynolds	12/17/2021	0.1	Searching for Deposition Transcript for Anna, correspondence with co-counsel regarding same.
			Saving Productions 17, 18, and 19 to the U:Drive. Updating Production Log and Sending Files to
Aaron McReynolds	12/17/2021	0.5	Ryan at DISCO for processing.
Aaron McReynolds	12/27/2021	0.1	Booking Production Ingest Call with Ryan (DISCO Agent)
			Saving Interrogatories Amended Answers Draft to NetDocs for Anna, Circulating Completed
Aaron McReynolds	12/27/2021	0.2	Adam McKinney Verification of Interrogatories Responses.
Aaron McReynolds	12/27/2021	0.3	Pulling 30(b)(6) deposition files and class cert briefing for David and Anna to review.
			Saving Fifth Third's Updated Initial Rule 26(a)(1) Disclosures and Plaintiff's Supplemental
Aaron McReynolds	12/27/2021	0.2	Responses to Fifth Third's Second Request for Production of Documents to NetDocs for Anna.
Aaron McReynolds	12/29/2021	0.5	Call with Anna regarding DISCO file onboarding and file management.
, , , , , , , , , , , , , , , , , , ,			Reviewing DISCO platform for Production organization, list of password protected files for
Aaron McReynolds	12/29/2021	0.5	Anna.
			Call with Ryan (DISCO Representative) regarding data ingests, password protected files, and
Aaron McReynolds	1/4/2022	0.9	partial file failures. Correspondence with Anna and team regarding same.
Aaron McReynolds	1/5/2022	0.4	Comparing original and clawed back productions for new redactions for Anna.
Aaron McReynolds	1/6/2022	0.5	Formatting Stipulation Regarding Authenticity of Documents for Anna.
Aaron McReynolds	1/6/2022	0.1	Correspondence with DISCO support regarding APR Expert inclusion on document emails.
Aaron McReynolds	1/7/2022	0.1	Circulating Calendar Deadlines to Dia.
Aaron McReynolds	1/10/2022	0.1	Correspondence with DISCO regarding clawed back and obsolete production files for Dia.
Aaron McKeynolds	1/10/2022	0.2	Saving Deposition Transcripts to NetDocs, Pulling 30(b)(6) transcript, and organizing NetDocs
Aaron McReynolds	1/11/2022	0.5	file for Anna.
Aaron McReynolds	1/11/2022	0.1	Saving Email Correspondence to NetDocs.
. M.D. 11	1/12/2022	1.7	Processing 20th and 21st Productions for Anna, Uploading to U:Drive, Updating Production
Aaron McReynolds	1/13/2022	1.7	Log, Uploading to DISCO, and Categorizing into Folders,
	4 /4 0 /= 0		Drafting Consent Motion To Extend Deadlines For Discovery And Dispositive Motions,
Aaron McReynolds	1/18/2022	1.4	Researching Local Rules and Standing Orders regarding same, for Anna.
Aaron McReynolds	1/19/2022	0.7	Finalizing and Filing Consent Motion to Extend Discovery and Dispositive Deadlines for Anna.
Aaron McReynolds	1/21/2022	1.6	Saving Productions 22 and 23 to U:Drive, onboarding files to DISCO.
Aaron McReynolds	1/24/2022	1.0	Creating Batches with DISCO support for Anna and David.
Aaron McReynolds	1/27/2022	0.1	Saving Email Correspondence to NetDocs.
Aaron McReynolds	1/27/2022	0.4	Debugging Tagging Production Error on DISCO with David and Co-Counsel.
Aaron McReynolds	1/28/2022	0.2	Correspondence with Anna and David regarding DISCO discovery updates.
Aaron McReynolds	2/1/2022	0.4	Saving/Processing Production 24 onto U Drive and DISCO for Anna, David, and Dia.
Aaron McReynolds	2/8/2022	0.3	Correspondence with David and Anna regarding DISCO invoice.
Aaron McReynolds	2/8/2022	0.2	Updating Calendar Events off of Proposed Consent Order for Dia.
Í			Compiling Deposition Transcripts and Other Files and Sending to Co-Counsel Via Sharefile for
Aaron McReynolds	2/9/2022	0.5	Anna.
Aaron McReynolds	2/11/2022	0.1	Pulling Production Document for Anna's Review.
Aaron McReynolds	2/11/2022	1.1	Pulling and Organizing Exhibits for Motion for Partial Summary Judgment for Anna.
Aaron McReynolds	2/11/2022	0.1	Correspondence with Co-Counsel Regarding Pulling PDFs from DISCO.
1 mon wereynous	2/11/2022	0.1	Pulling CM/ECF Citations of Motion for Partial Summary Judgment for Anna, Editing Minor
Agran MaDay == 1.1	2/11/2022	1.5	Docket Citations Errors in Brief.
Aaron McReynolds	2/11/2022	1.5	
A M.D. 11	2/15/2022	0.6	Correspondence with David, Anna, and DISCO representatives regarding outstanding invoice
Aaron McReynolds	2/15/2022	0.6	and the division of future payments among co-counsel and Tycko & Zavareei LLP.

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Aaron McReynolds 3/17/2022 0.3 Running , Pulling Phone Numbers for Dia.  Call with Dia Regarding Current Motion for Partial Summary Judgment Exhibits, Sealing Aaron McReynolds 3/23/2022 0.1 Filings .  Researching Sealing Procedures for the USDC for the Southern District of Ohio, Call with District Court Clerk Regarding Sealing Procedures for Motions in the Southern	Aaron McReynolds	3/16/2022	0.5	Formatting Demand Letter and Harmonizing Edits for Anna and Co-Counsel.
Aaron McReynolds 3/17/2022 0.3 Running , Pulling Phone Numbers for Dia.  Call with Dia Regarding Current Motion for Partial Summary Judgment Exhibits, Sealing Filings .  Researching Sealing Procedures for the USDC for the Southern District of Ohio, Call with District Court Clerk Regarding Sealing Procedures for Motions in the Southern				
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Aaron McReynolds 3/23/2022 0.1 Filings .  Researching Sealing Procedures for the USDC for the Southern District of Ohio, Call with District Court Clerk Regarding Sealing Procedures for Motions in the Southern	Aaron McReynolds	3/17/2022	0.3	
Aaron McReynolds 3/23/2022 0.7 Researching Sealing Procedures for the USDC for the Southern District of Ohio, Call with Nicole Regarding Same.  Call with District Court Clerk Regarding Sealing Procedures for Motions in the Southern				
Aaron McReynolds 3/23/2022 0.7 Nicole Regarding Same.  Call with District Court Clerk Regarding Sealing Procedures for Motions in the Southern	Aaron McReynolds	3/23/2022	0.1	
Call with District Court Clerk Regarding Sealing Procedures for Motions in the Southern		2/22/2022		
	Aaron McReynolds	3/23/2022	0.7	
Aaron McReynolds 1 3/23/2022 1 0.2 101 Unio.	. M.D. 11	2/22/2022	0.2	
	Aaron McReynolds	3/23/2022	0.2	
	A MaD	2/22/2022	0.5	Preparing Shell Drafts of Motion to Seal for Motion for Partial Summary Judgment for Anna and
Aaron McReynolds 3/23/2022 0.5 Dia.	Aaron wickeynoids	3/23/2022	0.5	Dia.
Aaron McReynolds 3/31/2022 0.2 Processing Invoice for Service of Subpoena With Hassan, Anna, Co-Counsel, and Jeanner	Aaron McReymolds	3/31/2022	0.2	Processing Invoice for Service of Subpoena With Hassan, Anna, Co-Counsel, and Jeannette.
Aaron McReynolds 4/1/2022 0.1 Processing CS Disco Invoice for March 2022 with David and Jeannette.				
Aaron McReynolds 4/4/2022 0.1 Frocessing CS Disco invoice for March 2022 with David and Jeannette.  Asron McReynolds 4/4/2022 0.1 Saving Attorney Correspondence to NetDocs.				
	randii ivicite yiidida			
Aaron McReynolds 4/5/2022 0.2 Correspondence with Dia and Veritext Regarding Howard Deposition.	Aaron McReynolds	4/4/2022	0.2	Correspondence with Dia and Anna regarding Depositions Notices

Timekeeper	Date	Time	Description
			Preparing Subpoenas and Notice of Deposition for Dia, Correspondence with Dia and Anna
Aaron McReynolds	4/5/2022	0.9	regarding same.
Aaron McReynolds	4/8/2022	0.1	Processing DISCO Invoice with Jeannette for David, Anna, and Hassan.
Aaron McReynolds	4/8/2022	0.6	Serving Notice of Deposition on Opposing Counsel, Booking Depositions with Veritext for Dia.
·			Preparing Motion for Admission Pro Hac Vice for Dia, Reviewing Local Rules and SDOH
Aaron McReynolds	4/8/2022	0.7	Website Regarding Same.
Aaron McReynolds	4/8/2022	0.2	Call with David Regarding Fifth Third DISCO Chronology
Aaron McReynolds	4/8/2022	2.5	Preparing/Updating Hot Docs Chronology for David and Hassan.
Aaron McReynolds	4/11/2022	0.1	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	4/11/2022	0.3	Processing Co-Counsel Reimbursement for Dia with Jeannette.
Aaron McReynolds	4/12/2022	0.3	Correspondence with David and Jeannette Regarding DISCO Billing Issue.
Aaron McReynolds	4/12/2022	0.1	Registering Dia for E-filling Credentials.
Aaron McReynolds	4/12/2022	0.1	Saving/Circulating CM/ECF Filings.
			Running Table of Contents and Table of Authorities for Memorandum in Support of Motion for
Aaron McReynolds	4/13/2022	1.3	Partial Summary Judgment, Preparing Shell Drafts of Motion and Sealing Papers.
Aaron McReynolds	4/13/2022	0.7	Compiling and Finalizing Exhibits to Motion for Partial Summary Judgment for Hassan and Dia.
Aaron McReynolds	4/14/2022	0.2	Updating Hot Doc Chronology with Attorney Notes for David and Hassan.
			Pulling Emails From Previous Paralegals to Ascertain Filing In-Camera Process, Call With A.
Aaron McReynolds	4/20/2022	0.6	Haac Regarding Same.
Aaron McReynolds	4/20/2022	0.1	Updating Attorney Calendars with Deposition of Bruce Howard.
J			Preparing Amended Notice of Deposition of Bruce Howard for D. Rasinariu, Updating Attorney
Aaron McReynolds	4/21/2022	0.2	Calendars Regarding Same.
Aaron McReynolds	4/21/2022	0.1	Pulling Unredacted Class Certification Memorandum and Exhibits for A. Haac.
•			Uploading Production 25 to DISCO for A. Haac and D. Lawler, Saving Production to U:Drive,
Aaron McReynolds	4/21/2022	0.5	correspondence regarding same with D. Lawler, A. Haac, and D. Rasinariu
Aaron McReynolds	4/21/2022	0.3	Conferring with A. Haac regarding Exhibits to Motion for Partial Summary Judgment
			Finalizing and Filing Motion for Partial Summary Judgment, Preparing Courtesy Copies for
Aaron McReynolds	4/22/2022	1.9	Monday Mail-Out for H. Zavareei, A. Haac, and D. Rasinariu.
			Updating Attorney Calendars with Motion for Partial Summary Judgment Response and Reply
Aaron McReynolds	4/22/2022	0.1	Deadlines.
			Serving Amended Notice of Deposition of Bruce Howard on Opposing Counsel, Booking
Aaron McReynolds	4/27/2022	0.4	Deposition via Veritext for H. Zavareei.
			Saving Clawback of Production to U:Drive, Updating Production Log, and Applying Clawback
Aaron McReynolds	4/28/2022	0.5	to DISCO and Hot Docs Chronology for A. Haac and D. Rasinariu.
			Downloading Veritext Deposition Videos and Saving to U:Drive for Attorneys, Correspondence
Aaron McReynolds	4/29/2022	0.2	with Co-Counsel regarding same.
	- /- /		Saving Notice of Deposition to NetDocuments for H. Zavareei, Updating Attorney Calendars
Aaron McReynolds	5/3/2022	0.2	From Same.
	7 /2 /2 02 C		Correspondence with Veritext Regarding Video Recording of Deposition of Bruce Howard for D
Aaron McReynolds	5/3/2022	0.2	Rasinariu.
A away MaDarmalda	5/4/2022	0.4	Pulling Documents from DISCO for Bruce Howard deposition for D. Rasinariu and H. Zavareei,
Aaron McReynolds Aaron McReynolds	5/4/2022 5/4/2022	0.4	call with D. Rasinariu regarding same.  Saving Recordings of Depositions of Carpenter and Erhardt to U:Drive for Attorneys.
Aaron McKeynolds	3/4/2022	0.2	Saving Clawback Production to U:Drive, Updating Production Log, and Uploading Clawback to
Aaron McReynolds	5/4/2022	0.3	Apply to DISCO Database, correspondence with A. Haac regarding same.
Aaron Werceynolds	3/4/2022	0.5	Correspondence with D. Rasinariu and Veritext Regarding Technical and Logistical Setup of
Aaron McReynolds	5/5/2022	0.1	Deposition.
Aaron McReynolds	5/6/2022	0.2	Saving Veritext Deposition Transcripts to NetDocuments and U:Drive for Attorneys.
jilotus	5.5.2022	· · · · ·	Call with Veritext Regarding Logistics of Deposition of Bruce Howard, Follow-up Call with D.
Aaron McReynolds	5/9/2022	0.8	Rasinariu regarding same.
Aaron McReynolds	5/10/2022	0.1	Correspondence with D. Rasinariu and H. Zavareei Regarding Deposition Preparation.
J			Preparing Binder for Deposition of Bruce Howard for H. Zavareei and D. Rasinariu with J.
Aaron McReynolds	5/11/2022	0.8	Morrison.
Aaron McReynolds	5/12/2022	0.1	Processing Invoice for Future Payment of Deposition Services for D. Rasinariu.
Aaron McReynolds	5/12/2022	0.1	Updating Attorney Calendars with Telephone Status Conference Information.
			Correspondence with Jeannette and Co-Counsel Regarding Reimbursement of Court Filing Fees
Aaron McReynolds	5/13/2022	0.2	for Pro Hac Vice Application of D. Rasinariu.
1 1 D 11	5/18/2022	0.2	Saving Deposition Transcripts to NetDocuments and the U:Drive.
Aaron McReynolds Aaron McReynolds	3/16/2022	0.2	Saving and Formatting for A. Haac.

Timekeeper	Date	Time	Description
Aaron McReynolds	5/20/2022	0.1	Saving/Circulating CM/ECF Filings.
			Call with Southern District of Ohio Clerk Regarding Filing of Sealed Exhibits in Light of Order
Aaron McReynolds	5/20/2022	0.7	Approving Same. Correspondence with Attorneys.
			Finalizing and Filing Sealed Exhibits to Motion for Partial Summary Judgment for H. Zavareei
Aaron McReynolds	5/20/2022	0.3	and A. Haac.
			Reviewing Deposition Transcript and Exhibits and Pulling Documents from DISCO for H.
Aaron McReynolds	5/25/2022	0.4	Zavareei and A. Haac.
Aaron McReynolds	5/25/2022	0.4	Preparing Proof of Service of Expert Reports for Attorneys.
Aaron McReynolds	5/25/2022	1.1	Formatting, Finalizing, and Serving on Opposing Counsel for A. Haac.
Aaron McReynolds	5/27/2022	0.1	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	5/31/2022	0.2	Saving/Circulating CM/ECF Filings and Updating Attorney Calendars.
Aaron McReynolds	6/1/2022	0.1	Saving Expert Data to NetDocuments.
Aaron McReynolds	6/1/2022	0.5	Compiling Documents to Send to Expert for A. Haac.
			Compiling Defendant's Expert Report Citations for Rebuttal Reports for A. Haac and H.
Aaron McReynolds	6/2/2022	3.1	Zavareei.
Aaron McReynolds	6/8/2022	0.2	Processing CS DISCO Invoice for June 2022 Charges with J. Jackson for D. Lawler.
Aaron McReynolds	6/13/2022	1.1	OCR'ing Expert Materials for A. Haac.
Aaron McReynolds	6/13/2022	0.2	Processing Invoice for Document Review Services for D. Lawler.
Aaron McReynolds	6/15/2022	0.2	Processing CS DISCO Invoice for D. Lawler.
			Correspondence with A. Haac regarding Rebuttal Expert Reports, calendaring deadlines for
Aaron McReynolds	6/22/2022	0.2	same.
Aaron McReynolds	6/27/2022	0.2	Saving Expert Reports to NetDocuments, Correspondence with A. Haac regarding same.
Aaron McReynolds	7/5/2022	0.5	Preparing Expense Report for H. Zavareei, A. Haac, and D. Rasinariu.
			Calendaring Defendant's Deposition of Expert Arthur Olsen, Correspondence with A. Haac
Aaron McReynolds	7/6/2022	0.2	regarding same.
Aaron McReynolds	7/11/2022	0.3	Calendaring Tentative Expert Deposition Dates for Attorneys.
			Finalizing and Serving Deposition Notice for H. Zavareei and D. Rasinariu, Booking Remote
Aaron McReynolds	7/12/2022	0.7	Deposition via Veritext. Adding Deposition Information to Attorney Calendars.
			Finalizing and Serving Additional Deposition Notices for H. Zavareei and D. Rasinariu, Booking
Aaron McReynolds	7/13/2022	1.3	Remote Depositions via Veritext. Adding Deposition Information to Attorney Calendars.
·			Saving Fifth Third's Deposition Notices to NetDocuments Case File, Updating Attorney
Aaron McReynolds	7/13/2022	0.3	Calendars.
Aaron McReynolds	7/14/2022	0.5	Adding Veritext Call-In Details to Each Deposition Calendar Event for Attorneys.
Aaron McReynolds	7/15/2022	0.2	Adding Dial-In Information to Deposition Calendar Events for Attorneys.
Aaron McReynolds	7/15/2022	0.2	Saving Rebuttal Expert Reports to Case File for Attorneys.
Aaron McReynolds	7/18/2022	0.1	Circulating Defendants Expert Materials to Expert for A. Haac.
Aaron McReynolds	7/27/2022	0.1	Saving Transcripts to NetDocuments Case File for A. Haac.
Aaron McReynolds	8/4/2022	0.2	Saving Deposition Transcript to NetDocuments for Attorneys.
Aaron McReynolds	8/5/2022	0.3	Saving Deposition Videos to U:Drive for Attorneys.
Aaron McReynolds	8/8/2022	0.3	Saving Deposition Videos to U:Drive.
Aaron McReynolds	8/9/2022	0.5	Compiling Expenses of Matter for A. Haac.
Aaron McKeynolds	0/9/2022	0.5	Saving Deposition Notice to NetDocuments, Updating Attorney Calendars and Verifying Dial-In
Aaron McReynolds	8/11/2022	0.3	Information.
Aaron McReynolds	8/11/2022	0.3	Saving and Organizing Deposition Videos to U:Drive Case File for Attorneys.
Aaron McKeynolds	6/11/2022	0.3	Organizing Deposition Videos to C.Drive Case File for Attorneys.  Organizing Deposition Transcript Files on NetDocuments and U:Drive Case Files, Updating
A anan MaDarmalda	9/15/2022	0.4	Attorney Calendars.
Aaron McReynolds	8/15/2022	0.4	
Aaron McReynolds	8/15/2022	0.2	Saving Amended Deposition Notice to NetDocuments, Updating Attorney Calendars.
Aaron McReynolds	8/17/2022	0.3	Organizing and Saving Deposition Transcripts to NetDocuments Case File.
Aaron McReynolds	8/30/2022	0.1	Saving deposition transcript errata to NetDocuments for A. Haac.
Aaron McReynolds	8/30/2022	0.6	Reviewing Vendor Common Expenses for A. Haac and H. Zavareei.
Aaron McReynolds	8/31/2022	0.7	Compiling Common Expenses for H. Zavareei and A. Haac.
	0/04/2022		Compiling Deposition Transcripts for D. Rasinariu, Correspondence with Veritext Regarding
Aaron McReynolds	8/31/2022	0.5	Same.
Aaron McReynolds	9/1/2022	0.2	Correspondence with Veritext regarding Deposition Errata Sheets for D. Rasinariu.
Aaron McReynolds	9/6/2022	0.3	Processing Payment to Co-Counsel Litigation Fund with J. Jackson for A. Haac and H. Zavareei
			Pulling Summary Judgment and Class Certification Order for Onboarding of Fellow C. Carlson
Aaron McReynolds	9/16/2022	0.2	for A. Haac.
Aaron McReynolds	9/16/2022	0.1	Saving Errata Sheets to NetDocuments for D. Rasinariu.

Timekeeper	Date	Time	Description
Aaron McReynolds	9/19/2022	0.1	Saving Completed Errata Sheet to NetDocuments Case File
			Reviewing Local Rules on Page Limitations and Related Requirements for Opposition to Motion
Aaron McReynolds	9/23/2022	0.2	for Summary Judgment for A. Haac and D. Rasinariu.
Aaron McReynolds	9/27/2022	0.2	Updating Case File for D. Rasinariu.
			Updating Highlighting of Citations in Opposition to Motion for Summary Judgment Brief for A.
Aaron McReynolds	9/28/2022	0.2	Haac.
Aaron McReynolds	9/28/2022	1.5	Reviewing Exhibits to Opposition to Motion for Summary Judgment for A. Haac.
			Formatting Exhibit and Finalizing Exhibit List, Correspondence with Co-Counsel regarding
Aaron McReynolds	9/29/2022	0.4	same.
Aaron McReynolds	10/3/2022	0.3	Formatting and Finalizing Exhibit to Opposition to Motion for Summary Judgment.
			Finalizing and Filing Opposition to Motion for Summary Judgment for A. Haac and D.
Aaron McReynolds	10/3/2022	1.6	Rasinariu.
			Running Table of Contents and Table of Authorities for Opposition to Motion for Summary
			Judgment, Checking Quotations, and Adding Table of Contents Summaries. Call with D.
Aaron McReynolds	10/3/2022	2.8	Rasinariu regarding same.
			Correspondence with A. Haac and Co-Counsel Regarding Deposition Transcripts, Saving and
Aaron McReynolds	10/5/2022	0.6	Circulating Transcripts.
Aaron McReynolds	10/12/2022	0.6	Saving Deposition Transcripts to NetDocuments, Updating Case File
Aaron McReynolds	10/19/2022	0.9	Formatting Template of Reply in Support of Motion for Summary Judgment.
Aaron McReynolds	10/24/2022	0.2	Processing CS DISCO invoice with J. Jackson for D. Lawler.
Aaron McReynolds	11/2/2022	0.1	Saving/Circulating CM/ECF Filings.
			Finalizing, Formatting, Proofreading, and Preparing Exhibits for Reply in Support of Motion for
Aaron McReynolds	11/2/2022	3.5	Partial Summary Judgment for H. Zavareei and A. Haac.
Aaron McReynolds	11/3/2022	0.5	Preparing Courtesy Copy of Reply In Support of Motion for Summary Judgment Briefing.
Aaron McReynolds	11/7/2022	0.1	Correspondence with Expert and Attorneys Regarding W-9 Form.
Aaron McReynolds	11/16/2022	0.2	Pulling Court Filings for A. Haac and Expert.
Aaron McReynolds	11/30/2022	0.2	Finalizing and Filing Notice of Change of Address of H. Zavareei, A. Haac, and D. Rasinariu.
Aaron McReynolds	12/9/2022	0.9	Compiling and Calendaring Trial Deadlines for A. Haac and H. Zavareei.
Aaron McReynolds	12/16/2022	0.1	Correspondence with Attorneys Regarding CS DISCO Invoice.
Aaron McReynolds	12/27/2022	0.1	Circulating CS DISCO Invoice to Co-Counsel to Pay From Litigation Fund.
Aaron McReynolds	12/30/2022	0.2	Adding Attorney Shana Khader to Trial Deadlines on Calendar.
			Correspondence with Co-Counsel Regarding Expense Reimbursements from Litigation Fund for
Aaron McReynolds	1/3/2023	0.5	CS DISCO Charges.
Aaron McReynolds	1/3/2023	1.5	Compiling Filed Exhibits in Preparation for Trial from Court Filings for A. Haac.
Aaron McReynolds	1/3/2023	0.1	Processing Invoice from Litigation Fund with Co-Counsel for Dec. 2022 CS DISCO Charges.
			Compiling List of Trial Witnesses from Party Disclosures and Expert Report for A. Haac,
Aaron McReynolds	1/3/2023	2.5	Pulling Documents for Each Witness for Attorney Review.
Aaron McReynolds	1/4/2023	0.3	Correspondence With J. Jackson and Co-Counsel Regarding Outstanding CS DISCO invoices.
			Organizing Case File and U:Drive with S. Khader in Preparation for Trial, Correspondence with
Aaron McReynolds	1/4/2023	0.5	Veritext Regarding Same.
Aaron McReynolds	1/4/2023	3.9	Compiling Filed Exhibits in Preparation for Trial from Court Filings for A. Haac.
Aaron McReynolds	1/5/2023	0.9	Preparing Shell Draft of Motion in Limine for A. Haac.
Aaron McReynolds	1/6/2023	0.5	Reviewing Deposition Transcripts for Attorney Role Information for A. Haac.
Aaron McReynolds	1/6/2023	0.4	Pulling Trial Judge Orders on Expert Admissibility (Rule 702/Daubert) for S. Khader.
Aaron McReynolds	1/9/2023	0.3	Correspondence with CS DISCO Regarding Outstanding Invoices/Payments.
Aaron McReynolds	1/9/2023	0.3	Compiling Trial Witness and Exhibit Documents for A. Haac and Co-Counsel.
Aaron McReynolds	1/9/2023	1.8	Compiling Filed Exhibits in Preparation for Trial from Court Filings for A. Haac.
Aaron McReynolds	1/10/2023	0.2	Processing CS DISCO invoice for January 2023 from Litigation Fund with Co-Counsel.
			Updating List of Trial Deadlines for A. Haac, Reviewing Fifth Third's additional trial deadline
Aaron McReynolds	1/10/2023	1.1	proposals.
Aaron McReynolds	1/11/2023	1.1	Pulling Trial Experience and Pretrial Order of Trial Judge for A. Haac and H. Zavareei.
Aaron McReynolds	1/11/2023	0.2	Organizing Trial Administrative Documents for A. Haac.
Aaron McReynolds	1/12/2023	2.1	Formatting and Uploading Deposition Videos and Transcripts to Trial Tech for A. Haac.
·			Finalizing and Serving Attorney Letter Regarding Confidential Settlement Demand for H.
Aaron McReynolds	1/13/2023	0.3	Zavareei.
Aaron McReynolds	1/13/2023	0.3	Pulling Sample Jury Instructions and Jury Instructions Form for A. Haac.
Aaron McReynolds	1/17/2023	2.2	Onboarding Additional Deposition Videos to Trial Tech for Attorneys
Aaron McReynolds	1/17/2023	0.2	Saving Attorney Coded Deposition Transcripts for Trial Preparation.
		V.2	1

Timekeeper	Date	Time	Description
Aaron McReynolds	1/18/2023	0.2	Saving/Circulating CM/ECF Filings, Updating Attorney Calendars.
			Saving/Circulating CM/ECF Filings, Updating Attorney Calendars and List of Deadlines
Aaron McReynolds	1/19/2023	0.4	Dependent on Changed Timing of Pretrial Conference.
Aaron McReynolds	1/19/2023	0.1	Saving Attorney Notes to NetDocuments Case File.
Aaron McReynolds	1/24/2023	0.3	Preparing Notice of Withdrawal for D. Rasinariu.
			Processing Reimbursement from Litigation Fund of CS DISCO Expenses for 2022 with J.
Aaron McReynolds	1/25/2023	0.1	Jackson.
			Compiling Updated Exhibit List from Exhibit Index for A. Haac, Call with A. Haac Regarding
Aaron McReynolds	1/26/2023	1.6	Same.
Aaron McReynolds	1/26/2023	0.2	Correspondence with Veritext Regarding Missing Transcript.
Aaron McReynolds	1/29/2023	0.1	Saving Annotated Transcripts to U:Drive.
Aaron McReynolds	1/30/2023	0.1	Pulling Client and Expert Contact Information for A. Haac.
Aaron McReynolds	1/31/2023	0.2	Pulling Updated Trial Exhibits and Deposition Transcripts for Co-Counsel.
Aaron McReynolds	2/1/2023	0.2	Pulling Required Pretrial Documents from Judge Barrett's Website for Co-Counsel and A. Haac
Aaron McReynolds	2/1/2023	0.2	Updating Witness Availability for Trial on Attorney Calendars.
Aaron McReynolds	2/1/2023	0.5	Preparing Trial Itinerary for A. Haac and H. Zavareei.
Aaron McReynolds	2/3/2023	0.1	Saving Potential Trial Demonstratives to U:Drive for A. Haac.
Aaron McReynolds	2/3/2023	0.2	Pulling Deposition Videos for Co-Counsel.
Aaron McReynolds	2/6/2023	0.1	Saving Trial Demonstratives to U:Drive Case File for A. Haac.
Aaron McReynolds	2/6/2023	0.2	Saving Annotated Transcripts for Trial Preparation for Co-Counsel.
Aaron McReynolds	2/7/2023	0.2	Saving Annotated Deposition Transcripts to U:Drive Case File for S. Khader.
Aaron McReynolds	2/7/2023	0.1	Pulling Summary Judgment Example Order for A. Haac.
Aaron McReynolds	2/8/2023	0.1	Processing CS DISCO Invoice for February 2023 with Co-Counsel.
Aaron McReynolds	2/8/2023	0.2	Finalizing and Filing Notice of Withdrawal of Counsel Dia Rasinariu.
Aaron McReynolds	2/9/2023	0.1	Saving Trial Demonstratives to U:Drive Trial File for A. Haac.
Aaron McReynolds	2/10/2023	0.1	Saving Annotated Deposition Transcript to U:Drive Trial Prep File.
Aaron McReynolds	2/13/2023	0.1	Saving Charles Grice Highlighted/Annotated Transcript to U:Drive Trial Prep Folder.
Aaron McReynolds	2/13/2023	0.2	Compiling Trial Documents to Co-Counsel Trial Prep.
Aaron McReynolds	2/13/2023	0.1	Saving Annotated Transcript to U:Drive Trial Prep Folder for C. Carlson.
Aaron McReynolds	2/14/2023	0.2	Pulling Deposition Transcripts for Co-Counsel.
Auton Werceynolds	2/14/2023	0.2	Correspondence with Veritext Regarding Outstanding Video Requests for C. Carlson and H.
Aaron McReynolds	2/14/2023	0.2	Zavareei.
Aaron McReynolds	2/17/2023	1.5	Updating Trial Exhibits for Co-Counsel, H. Zavareei, and A. Haac.
Aaron McReynolds	2/19/2023	2.1	Updating Trial Exhibits for Co-Counsel, H. Zavareei, and A. Haac.
Aaron McReynolds	2/21/2023	0.3	Preparing Pro Hac Vice Application for S. Khader.
Aaron McReynolds	2/21/2023	0.5	Reviewing Motions in Limine Deadlines with H. Zavareei and A. Haac.
Aaron McReynolds	2/21/2023	0.7	Reviewing Motions in Limine to Pull Exhibits.
Aaron McReynolds	2/22/2023	0.7	Saving/Circulating CM/ECF Filings, Updating Attorney Calendars.
Aaron McReynolds	2/22/2023	2.7	Finalizing and Filing Motions in Limine for H. Zavareei, A. Haac, and S. Khader.
Aaron McReynolds	2/22/2023	0.4	Preparing Proposed Orders for Motions in Limine for S. Khader.
Aaron wereynoids	212212023	0.4	Reviewing Standing Order for requirements on deposition transcript submissions and proposed
Aanan MaDarmalda	2/22/2022	0.1	orders with S. Khader.
Aaron McReynolds	2/22/2023	0.1	Formatting and Updating Case Record Citations for Motion in Limine as to Charles Grice and
A M - D 1.1-	2/22/2022	1.6	Joseph Green for H. Zavareei, A. Haac, and S. Khader.
Aaron McReynolds	2/22/2023	1.6	
Aaron McReynolds	2/28/2023	0.2	Uploading and Circulating Updated Trial Exhibits to Co-Counsel.
Aaron McReynolds	2/28/2023	0.2	Processing Reimbursement of Filing Fee for Pro Hac Vice Application for S. Khader.
. M.D. 11	2 /1 /2 02 2		Saving/Circulating CM/ECF Filings, Finalizing Pro Hac Vice E-filling Registration for S.
Aaron McReynolds	3/1/2023	0.1	Khader.
A 3455 11	2/2/222		Filler Committee and Western Development Control of the Control of
Aaron McReynolds	3/2/2023	0.1	Follow-up Correspondence with Veritext Regarding Outstanding Deposition Video Requests.
Aaron McReynolds	3/2/2023	0.5	Finalizing and Uploading Outstanding Deposition Videos for Trial Prep.
			Correspondence with Veritext and Trial Tech Regarding Video Synchronization and Video
Aaron McReynolds	3/3/2023	0.2	Viewer.
Aaron McReynolds	3/3/2023	0.2	Uploading Deposition Videos for Trial Tech Preparation and Finalization for Attorneys.
Aaron McReynolds	3/6/2023	0.1	Pulling Produced Document from CS DISCO for Attorneys and Co-Counsel.
Aaron McReynolds	3/8/2023	0.1	Saving/Circulating CS DISCO Invoice to Co-Counsel to be processed from Litigation Fund.
			Finalizing and Formatting Plaintiffs' Opposition to Fifth Third's Daubert Motion and Motion in
			Limine to Exclude the Opinions and Testimony of M. Patricia Oliver and Michael Simkovic for
Aaron McReynolds	3/8/2023	0.9	S. Khader.

Timekeeper	Date	Time	Description
Aaron McReynolds	3/8/2023	0.1	Processing Litigation Fund Payment for A. Haac and H. Zavareei for J. Jackson.
Aaron McReynolds	3/8/2023	0.2	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	3/9/2023	0.1	Pulling Produced Document for Co-Counsel Exhibit Review.
Aaron McReynolds	3/10/2023	0.5	Downloading Transactional Data for Co-Counsel Trial Exhibit List
Aaron McReynolds	3/10/2023	0.1	Saving Served Trial Exhibit List to NetDocuments Case File.
Aaron McReynolds	3/10/2023	0.3	Transferring Synchronized Deposition Files to U:Drive with Acuity for A. Haac.
Aaron McReynolds	3/10/2023	1.1	Reviewing and Comparing Parties Trial Exhibit Lists and Making Comparison Sheet for A. Haac.
Aaron McReynolds	3/13/2023	0.3	Pulling Additional Deposition .txt files for Trial Tech Video Synchronization Prep for S. Khader
Aaron McReynolds	3/13/2023	0.4	Updating List of Trial Deadlines and Attorney Calendars with Agreed Additional Deadlines.
Aaron McReynolds	3/17/2023	0.2	Saving Exchanged Trial Documents to NetDocuments Case File for A. Haac.
Aaron McReynolds	3/21/2023	0.2	Saving Trial Documents to NetDocuments Case File.
Aaron McReynolds	3/21/2023	0.3	Saving/Organizing Defendant's Trial Exhibits to U:Drive for A. Haac.
Aaron McReynolds	3/22/2023	0.7	Compiling Trial Materials for Trial Tech for A. Haac.
Aaron McReynolds	3/23/2023	0.1	Saving Updated Exhibit List to NetDocuments Case File.
Aaron McReynolds	3/23/2023	0.2	Saving/Circulating CM/ECF Filings.
Aaron McReynolds	3/24/2023	0.4	Organizing and Saving Trial Documents to NetDocuments Case File for C. Carlson and S. Khader.
Aaron McReynolds	3/27/2023	0.5	Onboarding Synchronized Deposition Videos for Co-Counsel and A. Haac.
Aaron McReynolds	3/27/2023	0.5	Creating Trial Exhibit Index for A. Haac.
Aaron McReynolds	3/27/2023	0.3	Reviewing Fifth Third's Production for DX 85 Video File for A. Haac.
Aaron McReynolds	3/27/2023	0.3	Pulling Trial Exhibit for A. Haac and S. Khader.
Aaron McReynolds		<b>-</b>	Finalizing Binders for H. Zavareei and Sending via Courier.
	3/28/2023	1.1	
Aaron McReynolds	4/28/2023	0.3	Calendaring Appeals Deadline, Reviewing Rules on Same.
Aaron McReynolds	5/5/2023	0.1	Processing CS DISCO Invoice from Litigation Fund with Co-Counsel,
Aaron McReynolds	5/8/2023	0.4	Formatting Shell of Plaintiffs' Motion for Attorneys' Fees for A. Haac.
Aaron McReynolds	6/5/2023	0.4	Running Updated Lodestar and Expense Report for C. Carlson.
Aaron McReynolds	6/6/2023	0.3	Running Updated Lodestar and Expense Report for H. Zavareei.
Aaron McReynolds	6/6/2023	0.1	Correspondence with Attorneys and J. Jackson regarding Class Notice expenses.
Aaron McReynolds	6/6/2023	0.2	Pulling Case Filings for A. Haac.
Aaron McReynolds	6/12/2023	1.4	Formatting Coded Lodestar in Advance of TILA Fee Motion for Anna Haac, Running Calculations from Same.
			Preparing Proposed Order on Motion for Attorneys' Fees and Proposed Judgment in a Civil Case
Aaron McReynolds	6/12/2023	0.5	for A. Haac, Call with A. Haac regarding same.
Aaron McReynolds	6/12/2023	0.6	Researching TILA Class Action Complaints for A. Haac.
Aaron McReynolds	6/12/2023	0.6	Organizing Coded Expenses for A. Haac for Fee Motion, Running Calculations From Same.
			Formatting, Finalizing, and Filing Plaintiffs' Motion for Entry of Judgment, Attorneys' Fees and Costs, and for a Briefing and Class Notice Schedule for H. Zavareei and A. Haac, Serving
Aaron McReynolds	6/12/2023	0.8	Proposed Order and Judgment Regarding Same.
Aaron McReynolds	6/12/2023	0.2	Saving/Circulating CM/ECF Filings, Updating Attorney Calendars.
Aaron McReynolds	7/3/2023	0.1	Correspondence with Co-Counsel Regarding Outstanding CS DISCO Invoices.
Aaron McReynolds	7/3/2023	0.2	Pulling Updated Matter Expenses Through Trial for A. Haac.
Aaron McReynolds	7/10/2023	0.1	Processing CS DISCO Invoice from Litigation Fund for July 2023 with Co-Counsel.
			Preparing Reply in Support of Motion for Entry of Judgment, Attorneys' Fees and Costs, and for
Aaron McReynolds	7/11/2023	0.3	a Briefing and Class Notice Schedule.
Allegra Lubar	9/22/2023	3.6	Researching and creating fee chart.
Allegra Lubar	9/25/2023	1.9	Updating fee comparison chart, preparing Lodestar and time report
Allegra Lubar	9/26/2023	1.5	Researching and supplemental declaration to be included as an exhibit to b
Allegra Lubar	12/7/2023	0.5	Preparing binder on Motion for Attorney's Fees and Post-Trial Motions for H. Zavareei.
Allegra Lubar	12/8/2023	0.8	Preparing binder on Motion for Attorney's Fees and Post-Trial Motions for H. Zavareei and sending via courier.
Allegra Lubar	12/14/2023	0.5	Creating table of time entries before 9/25/2023.
Allegra Lubar	12/15/2023	0.5	Creating table of time entries before 9/25/2023.
i inogra Daour	12/13/2023	0.5	
Allegra Lubar	12/18/2023	0.3	Circulating Declaration of Hassan ISO Plaintiffs' Motion for Attorneys' Fees and Costs Exhibit 2 - WIP Report Entries before 2023.09.26, discussing time entries with G. Wolinsky.
	5/24/2013	1.3	Attend Fifth Third Phone Status Conference
Amy Berkowitz			

Timekeeper	Date	Time	Description
Amy Berkowitz	6/27/2013	0.5	Attend telephone conference with Judge and co-counsel
Amy Berkowitz	7/31/2013	0.3	Time expense report
. 5.1	0/11/2012		
Amy Berkowitz	9/11/2013	0.8	Prepare binder of legal research memos and plaintiff questionnaires for telephonic conference
Amy Berkowitz	9/11/2013	0.5	Fill out plaintiff questionnaires
Amy Berkowitz	9/16/2013	0.5	Create time/expense report
Amy Berkowitz	10/3/2013	0.3	Complete Adam McKinney plaintiff questionnaire
Amy Berkowitz	10/3/2013	0.3	Complete William Klopfenstein plaintiff questionnaire
Amy Berkowitz	10/15/2013	1.0	Edit consolidated amended complaint
Amy Berkowitz	10/15/2013	0.2	Send co-counsel William Klopfenstein's bank statements
A D	10/16/2012	0.5	Dedect William VI auforetein Donk Statement to attack at the Consolidated Amended Complaint
Amy Berkowitz	10/16/2013	0.5	Redact William Klopfenstein Bank Statement to attached to Consolidated Amended Complaint Prepare time/expense reports for TZ
Amy Berkowitz	10/18/2013	0.3	Email H. Zavareei ECF Docket No. 13
Amy Berkowitz	10/30/2013	0.1	
Amy Berkowitz	11/27/2013	0.2	Create time and expense reports
Amy Berkowitz	12/2/2013	0.3	Circulate time and expenses reports
Amy Berkowitz	12/16/2013	0.2	Check for response date to Defendant's Motion to Dismiss Consolidated Amended Complaint
Amy Berkowitz	1/24/2014	0.3	Create time and expenses reports
Amy Berkowitz	1/27/2014	0.1	Send co-counsel time and expenses reports
Amy Berkowitz	2/4/2014	0.7	Create January 2014 Time and Expenses Report
Amy Berkowitz	2/26/2014	0.7	Phone call re Fifth Third overdraft litigation class member
Amy Berkowitz	5/15/2014	0.1	Create Time and Expense reports
		0.2	Send plaintiffs' contact information to J. Kaliel
Amy Berkowitz	3/31/2015		Reviewing mediation communication from court.
Anna Haac	5/2/2018	0.1	
Anna Haac	5/10/2018	0.2	Reviewing mediation information and background form.
Anna Haac	7/31/2018	0.6	Researching TILA cap.
Anna Haac	1/29/2019	0.3	Looking up oral argument.
Anna Haac	5/29/2019	2.1	Preparing talking points.
Anna Haac	7/3/2019	0.5	Reviewing discovery requests and draft schedule.
Anna Haac	7/5/2019	1.7	Reviewing discovery requests and responses, 5/3 production, and correspondence re: same.
Anna Haac	7/7/2019	1.0	Reviewing files for case to get up to speed, correspondence with co-counsel re: same.
Anna Haac	7/8/2019	0.5	Reviewing discovery responses, correspodence with co-counsel re: same.
Anna Haac	7/8/2019	1.4	Call with A. Olsen re: discovery needed, preparation for same.
			Editing discovery requests and discovery joint statement, correspondence with co-counsel re:
Anna Haac	7/9/2019	1.1	same.
Anna Haac	7/16/2019	0.2	Correspondence re: discovery served.
Anna Haac	7/23/2019	0.5	Call with co-counsel re: discovery.
Anna Haac	7/29/2019	0.1	Reviewing edits to discovery plan and correspondence with co-counsel re: same.
Anna Haac	7/30/2019	0.3	Status conference.
			Reviewing discovery requests, reviewing case file for purposes of responding to discovery
Anna Haac	8/20/2019	2.3	requests, correspondence with co-counsel and clients re: same.
			Working on discovery requests, correspondence with plaintiffs and co-counsel for purposes of
Anna Haac	8/21/2019	3.0	responding to same.
Anna Haac	8/28/2019	0.2	Reviewing documents for discovery.
Anna Haac	8/29/2019	0.9	Reviewing initial disclosures, correspondence with co-counsel re: discovery.
			Reviewing Klopfenstein bankruptcy for discovery purposes, correspondence with bankruptcy
Anna Haac	8/29/2019	0.9	attorney re: same.
Anna Haac	8/29/2019	0.6	Group call re: discovery, following us work related to same.
Anna Haac	8/30/2019	0.4	Reviewing discovery, drafting letter regarding same.
Anna Haac	8/30/2019	0.1	Reviewing pro hac vice motion.
			Reviewing Defendant's discovery responses, drafting letter to opposing counsel and other inter-
Anna Haac	9/4/2019	2.1	correspondence re: same.
Anna Haac	9/5/2019	1.8	Call with co-counsel re: trial plan questions.
Anna Haac	9/6/2019	0.1	Reviewing comments from co-counsel re: discovery letter.
Anna Haat	7/0/2017	0.1	Correspondence with co-counsel, re-reviewing discovery related court orders and requests,
Anna Haac	9/9/2019	1 0	editing letter to opposing counsel about same.
		1.8	Correspondence internally re: discovery steps.
Anna Haac	9/16/2019	0.5	
Anna Haac	9/17/2019	0.3	Reviewing correspondence from opposing counsel re: discovery issues.

Timekeeper	Date	Time	Description
			Correspondence with co-counsel and opposing counsel re: discovery, preparation for same,
Anna Haac	9/18/2019	1.1	including reviewing prior production by Defendant.
Anna Haac	9/18/2019	1.9	Editing written discovery responses.
Anna Haac	9/19/2019	0.5	Correspondence with co-counsel re: bankruptcy question.
Anna Haac	9/19/2019	0.6	M&C with opposing counsel re: discovery issues.
Anna Haac	9/25/2019	0.6	Reviewing discovery responses and editing same.
Anna Haac	9/25/2019	0.5	Call with client and email with opposing counsel re: dismissal.
Anna Haac	9/26/2019	0.3	Internal correspondence and with co-counsel re: discovery responses.
Anna Haac	9/26/2019	0.4	Call with defense counsel re: dismissal of plaintiff.
Anna Haac	9/27/2019	0.9	Call with opposing counsel and internal correspondence re: same.
Anna Haac	9/27/2019	0.9	Reviewing and editing discovery responses, correspondence with client re: same.
Anna Haac	9/28/2019	0.5	Standing research.
Anna Haac	10/2/2019	0.2	Correspondence with client and internally re: discovery verifications.
Anna Haac	10/23/2019	0.2	Correspondence with plaintiff for interrogatory verification.
Anna Haac	10/24/2019	0.3	Correspondence with named plaintiff re: verification.
			Email with opposing counsel following up on M&C, reviewing past correspondence for purpo
Anna Haac	10/29/2019	0.5	of same.
Anna Haac	10/30/2019	1.0	Call with Court and internal correspondence re: discovery strategy.
Anna Haac	10/31/2019	0.1	Correspondence with co-counsel re: discovery.
Anna Haac	11/3/2019	0.1	Correspondence with co-counsel re: conference call to discuss discovery meet and confer.
			Internal and external correspondence re: research needed re: relevance of consumer credit
Anna Haac	11/12/2019	1.1	applications.
Anna Haac	11/12/2019	0.4	Reviewing discovery responses and correspondence re: same.
Anna Haac	11/12/2019	0.1	Reviewing draft letter re: bankruptcy.
Aima Haac	11/12/2017	0.1	Research into discovery related to other credit applications, drafting email to opposing counse
Anna Haac	11/15/2019	2.8	re: same, and related internal correspondence.
Anna Haac	11/19/2019	0.4	Reviewing correspondence regarding damages and Fifth Third's SEC filing.
Anna Haac	11/19/2019	0.4	Reviewing discovery correspondence from opposing counsel.
Anna Haac	11/26/2019	0.3	Correspondence with co-counsel re: deposition preparation and attendance.
			Reviewing and cataloging production; correspondence with co-counsel re: same
Anna Haac	12/2/2019	3.4	
Anna Haac	12/4/2019	0.5	Call with H. Zavareei re: case needs and discovery next steps.
Anna Haac	12/8/2019	1.7	Drafting deposition outline to prepare named plaintiffs.
	10/0/0010		Call with co-counsel re: discovery needed and M&C letter received from defense counsel, ema
Anna Haac	12/9/2019	1.4	follow-up with action items.
Anna Haac	12/9/2019	7.1	Drafting deposition outline.
Anna Haac	12/10/2019	0.2	Editing deposition outline, correspondence with co-counsel re: same.
			Drafting responsive letter to opposing counsel re: discovery meet and confer and corresponding
Anna Haac	12/12/2019	1.0	with client for purposes of the same.
Anna Haac	12/16/2019	0.6	Drafting letter to opposing counsel re: discovery items.
Anna Haac	12/16/2019	1.5	Deposition prep with Laskaris clients.
Anna Haac	12/17/2019	2.4	Drafting letter response to opposing counsel re: discovery disputes.
Anna Haac	12/17/2019	0.5	Call with client.
Anna Haac	12/18/2019	3.1	Deposition prep with Lori and Dan Laskaris.
Anna Haac	12/18/2019	0.5	Correspondence with co-counsel re: deposition preparation.
Anna Haac	12/18/2019	0.6	Reviewing edits to letter to opposing counsel, finalizing same.
Anna Haac	12/19/2019	1.7	Drafting letter to opposing counsel re: discovery deficiencies.
Anna Haac	12/19/2019	6.5	Deposition of Lori and Dan Laskaris.
Anna Haac	12/20/2019	0.9	Drafting 30(b)(6) deposition notice.
Anna Haac	12/20/2019	0.1	Finalizing discovery letter to opposing counsel.
Anna Haac	12/21/2019	2.5	Drafting 30(b)(6) deposition notice.
A TY	10/02/0010	0.4	Commenced and with an annual and Will Contain Indiana. 120/1/00 1 127
Anna Haac	12/23/2019	0.4	Correspondence with co-counsel re: Klopfenstein bankruptcy and 30(b)(6) deposition notice.
Anna Haac	12/26/2019	0.6	Reviewing co-counsel edits to 30(b)(6) notice, related correspondence.
Anna Haac	12/29/2019	0.7	Research re: bankruptcies of named plaintiffs.
Anna Haac	12/29/2019	0.1	Correspondence with client re: deposition.
			Researching the intersection of bankruptcy discharges with class certification and drafting me
Anna Haac	12/30/2019	2.1	memorializing the same.
			Reviewing co-counsel edits to 30(b)(6) deposition notice and related discovery correspondence
Anna Haac	12/30/2019	2.0	with co-counsel.
	12/31/2019	0.2	Drafting discovery request and correspondence internally re: serving same.

Timekeeper	Date	Time	Description
Anna Haac	1/2/2020	0.5	Correspondence internally re: deposition availability of named plaintiff and prepping same.
Anna Haac	1/5/2020	0.2	Correspondence with co-counsel re: deposition transcript.
Anna Haac	1/6/2020	0.1	Internal correspondence re: deposition location.
Anna Haac	1/7/2020	0.2	Reviewing discovery request, internal follow-up re: same.
Anna Haac	1/8/2020	0.3	Follow-up discovery correspondence with opposing counsel.
Anna Haac	1/13/2020	0.5	Correspondence with co-counsel re: discovery response from opposing counsel.
Anna Haac	1/13/2020	0.3	Deposition preparation for Fryock deposition.
Anna Haac	1/15/2020	0.2	Correspondence with client re: deposition dates.
Anna Haac	1/15/2020	0.3	Responding to various requests for information related to deposition preparation of Fyock.
Anna Haac	1/16/2020	1.3	Drafting letter to opposing counsel re: discovery and email correspondence re: same.
			Finalizing discovery letter, drafting response to 30(b)(6) objections, correspondence with co-
Anna Haac	1/17/2020	2.7	counsel re: same.
			Call with co-counsel re: 30(b)(6) discovery and objections and editing related letter to opposir
Anna Haac	1/21/2020	1.3	counsel.
Anna Haac	1/23/2020	0.1	Correspondence with co-counsel re: meet and confer.
			Discovery meet and confer with opposing counsel re: 30(b)(6) objections and other outstanding
Anna Haac	1/27/2020	2.8	items, preparatory call and follow-up correspondence with co-counsel re: same.
Anna Haac	2/3/2020	1.4	Internal correspondence re: depositions and damages.
Anna Haac	2/4/2020	0.5	Researching and responding to questions from co-counsel during deposition prep.
111111111111111111111111111111111111111	2/ 1/2020	0.0	
Anna Haac	2/4/2020	1.5	Call with co-counsel re: 30(b)(6) objections and response, follow up with expert and plaintiff
Anna Haac	2/5/2020	1.0	Correspondence with co-counsel re: deposition and research re: arbitration
	_		Internal correspondence re: class certification strategy.
Anna Haac	2/7/2020	1.0	Correspondence with named plaintiff.
Anna Haac	2/10/2020	0.1	
Anna Haac	2/10/2020	0.1	Reviewing discovery responses.
	0/11/0000	^ =	Conference call with co-counsel and opposing counsel re: settlement demand and 30(b)(6)
Anna Haac	2/11/2020	0.7	deposition strategy.
			Reviewing Rule 30(b)(6) deposition correspondence from opposing counsel, email with co-
Anna Haac	2/12/2020	0.5	counsel re: response.
Anna Haac	2/13/2020	0.1	Correspondence with co-counsel re: Rule 30(b)(6) agreement.
Anna Haac	2/19/2020	0.3	Planning for Rule 30(b)(6) deposition.
Anna Haac	2/21/2020	0.2	Correspondence with co-counsel and named plaintiff.
Anna Haac	3/5/2020	1.4	Revising mediation statement.
Anna Haac	3/8/2020	0.6	Drafting 30(b)(6) deposition outline.
Anna Haac	3/10/2020	2.5	Drafting 30(b)(6) deposition outline, reviewing notice for same.
Anna Haac	3/11/2020	5.7	Drafting 30(b)(6) deposition outline.
Anna Haac	3/12/2020	0.2	Internal correspondence re: deposition logistics.
Anna Haac	3/13/2020	2.4	Call with H. Zavareei to go over 30(b)(6) deposition outline.
Anna Haac	3/13/2020	1.4	Internal correspondence re: 30(b)(6) deposition logistics, finalizing deposition notice.
Anna Haac	3/14/2020	2.4	Editing 30(b)(6) discovery dispute letter.
Anna Haac	3/15/2020	0.3	Correspondence re: 30(b)(6) deposition.
Anna Haac	3/16/2020	1.3	Correspondence internally and with co-counsel re: deposition rescheduling and mediation.
Anna Haac	3/20/2020	0.5	Editing demand letter and correspondence re: same.
Anna Haac	3/22/2020	2.0	Editing demand letter per H. Zavareei's comments.
Anna Haac	3/23/2020	0.1	Internal correspondence re: demand letter.
Anna Haac	3/24/2020	3.9	Editing mediation statement and correspondence with judge and co-counsel re: same.
Anna Haac	3/25/2020	0.2	Correspondence with co-counsel and with court re: mediation.
Anna Haac	3/26/2020	1.0	Call with co-counsel re: logistics and strategy given Coronovirus delays.
Anna Haac	3/26/2020	1.6	Drafting letter to opposing counsel re: moving forward with briefing and discovery.
Anna Haac	3/20/2020	0.6	Editing letter to opposing counsel, internal correspondence re: same.
Anna Haac	3/30/2020	0.0	Correspondence internally and with opposing counsel following up on request for call.
Anna Haac Anna Haac	3/30/2020	0.2	Correspondence with opposing counsel re: scheduling call.
Анна паас	3/31/2020	0.2	
A TT	2/21/2020	0.5	Correspondence internally re: class certification and summary judgment briefing and division
Anna Haac	3/31/2020	0.5	labor.
			Call with opposing counsel re: various outstanding issues arising from COVID, preparation a
Anna Haac	4/2/2020	1.7	follow up for same.
Anna Haac	4/4/2020	0.6	Reviewing correspondence from bank and internal correspondence re: same.
Anna Haac	4/5/2020	0.2	Correspondence with co-counsel re: bank's response and court call.
Anna Haac	4/6/2020	0.3	Internal correspondence re: MSJ strategy.
Anna Haac	4/6/2020	1.0	Status conference with court, internal call with co-counsel in preparation for same.

Timekeeper	Date	Time	Description
Anna Haac	4/6/2020	2.3	Drafting class certification opening brief.
Anna Haac	4/7/2020	0.5	Correspondence with expert and co-counsel re: declaration needed ISO class certification.
Anna Haac	4/7/2020	4.5	Editing class certification brief.
Anna Haac	4/8/2020	4.1	Editing class cert brief.
Anna Haac	4/9/2020	2.7	Editing class cert brief and research for same.
Anna Haac	4/10/2020	4.6	Editing class certification brief and research for same.
Anna Haac	4/11/2020	4.1	Editing class cert brief.
Anna Haac	4/12/2020	2.7	Editing class cert brief and research for same.
			Reviewing edits to class certification brief, revising same, Internal correspondence with
Anna Haac	4/13/2020	3.5	paralegals re: pulling exhibits.
			Correspondence with paralegals to discuss POA for class certification filing and additional tas
Anna Haac	4/14/2020	0.7	needing to be completed, review and editing of supporting administrative declarations.
			Reviewing edits to class certification brief and related correspondence with co-counsel and
Anna Haac	4/14/2020	1.7	expert.
			Reviewing edits to and revising class certification brief by co-counsel, correspondence interna
			and with co-counsel re: same, reviewing exhibits and other supporting documents, related
Anna Haac	4/15/2020	7.9	research.
			Reviewing protective order and sealing requirements, conferring with opposing counsel re:
Anna Haac	4/15/2020	1.0	sealed information.
Anna Haac	4/16/2020	1.1	Reviewing and editing draft motion to seal.
			Meet and confer with opposing counsel re: confidentiality designations and process for filing
Anna Haac	4/17/2020	0.5	class certification brief.
Anna Haac	4/17/2020	0.9	Editing class certification brief and .
Anna Haac	4/18/2020	5.6	Editing class certification brief, internal correspondence re: same.
Anna Haac	4/19/2020	3.1	Editing class cert brief and research for same.
Anna Haac	4/20/2020	0.2	Reviewing Fifth Third production.
Anna Haac	4/20/2020	8.8	Final review and edit of class certification motion, correspondence internally re: same.
Anna Haac	4/21/2020	0.8	Research for proposed order, correspondence re: same.
Anna Haac	4/21/2020	0.4	Correspondence re: summary judgment motion.
Anna Haac	4/21/2020	0.4	Correspondence re: Summary Judgment motion.  Correspondence re: Klopfenstein bankruptcy regarding next steps.
			Correspondence with opposing counsel re: confidential information.
Anna Haac	4/24/2020	0.2	Reviewing unredacted filing.
Anna Haac	4/27/2020		
Anna Haac	4/27/2020	0.5	Reviewing Klopfenstein bankruptcy docket, contact with bankruptcy attorney.
Anna Haac	4/29/2020	0.4	Follow up with paralegal and expert on filing and information needed.
Anna Haac	4/30/2020	0.8	Correspondence re: production, reviewing same.
Anna Haac	4/30/2020	1.1	Call with Klopfenstein trustee and related internal correspondence.
Anna Haac	5/5/2020	0.1	Reviewing summary judgment motion and correspondence with co-counsel re: same.
Anna Haac	5/6/2020	0.1	Correspondence with Klopfenstein bankruptcy attorney.
			Correspondence internally and with opposing counsel re: expert discovery and other outstandi
Anna Haac	5/14/2020	0.6	issues.
Anna Haac	5/14/2020	3.4	Review and edit of summary judgment brief.
Anna Haac	5/15/2020	0.2	Correspondence internally and with opposing counsel re: discovery items.
Anna Haac	5/18/2020	1.2	Conference call with co-counsel re: next steps in case and email follow-up.
Anna Haac	5/26/2020	0.1	Correspondence with co-counsel re: defense counsel lack of response to discovery issues.
Anna Haac	5/28/2020	0.1	Correspondence with expert re:
Anna Haac	5/29/2020	1.1	Drafting supplemental declaration and correspondence with expert about same.
Anna Haac	5/29/2020	1.0	Call with opposing counsel and prepatory call for same in advance of status conference.
Anna Haac	5/29/2020	0.4	Call with opposing counsel re: confidentiality designations.
Anna Haac	5/31/2020	0.3	Reviewing draft language to opposing counsel re: 30(b)(6) deposition.
			Reviewing correspondence with opposing counsel and related internal correspondence to prep
Anna Haac	6/3/2020	2.1	for court status conference, attending same.
Anna Haac	6/22/2020	0.3	Internal correspondence re: bankruptcy filing.
Anna Haac	6/29/2020	0.3	Call with expert re: data results.
			Correspondence with expert and co-counsel re: loan data analysis and update from opposing
Anna Haac	6/30/2020	0.9	counsel.
Anna Haac	7/17/2020	0.3	Correspondence internally and with opposing counsel re: sealing questions.
Anna Haac	7/20/2020	0.3	Internal correspondence and related edits to mediation statement.
Anna Haac	7/20/2020	1.8	Reviewing mediation statement and editing same.
Anna Hade	112112020	1.0	Further review and edit of mediation statement, related research and correspondence with co-
	1	l	It arries review and curt of inectation statement, related research and correspondence with co-

Timekeeper	Date	Time	Description
Anna Haac	7/27/2020	0.1	Internal correspondence re: reply brief.
Anna Haac	7/29/2020	0.1	Reviewing stipulation.
Anna Haac	7/29/2020	0.2	Reviewing news coverage of case.
Anna Haac	8/3/2020	0.3	Correspondence internally and with co-counsel re: preparation for mediation.
Anna Haac	8/4/2020	1.2	Team conference call to prepare for mediation, following up on various research items needed.
Anna Haac	8/7/2020	0.2	Reviewing minute entry re: mediation and related internal correspondence.
Anna Haac	8/7/2020	0.1	Reviewing financial information forwarded by paralegal.
Anna Haac	8/11/2020	0.2	Status conference with court.
Anna Haac	8/17/2020	2.7	Reviewing opp'n to class cert motion, drafting reply, and related research.
			Drafting and researching for reply to class cert motion, and related correspondence with co-
Anna Haac	8/18/2020	2.6	counsel re: bankruptcy issue and thoughts.
Anna Haac	8/19/2020	3.1	Drafting reply brief and related research.
Anna Haac	8/20/2020	2.5	Drafting class cert reply and related research.
Anna Haac	8/24/2020	1.1	Reviewing brief.
Anna Haac	8/25/2020	2.2	Editing reply brief.
Anna Haac	8/27/2020	4.0	Reviewing and revising edits to reply brief, related research.
Anna Haac	8/28/2020	0.4	Correspondence re: research needed to Reply brief.
Anna Haac	8/31/2020	3.7	Reviewing research from co-counsel for reply brief, editing same.
Anna Haac	9/1/2020	0.6	Reviewing edits to class cert reply, correspondence with co-counsel re: same.
Anna Haac	9/2/2020	1.5	Final review and editing of reply brief.
Anna Haac	9/14/2020	0.5	Call with potential class member re: bank issue.
Anna Haac	9/23/2020	0.7	Team call re: status conference, discussion with Judge, and mediation strategy.
Anna Haac	9/24/2020	0.4	Status conference with court, follow-up with co-counsel.
Anna Haac	9/24/2020	3.2	Drafting opposition to motion for leave and internal correspondence related to same.
	7.2		Revising opposition to motion to leave and related research, correspondence with paralegal re:
Anna Haac	9/25/2020	2.4	help needed on same.
7 Hillia 11aac	3/23/2020	2	Reviewing edits to opposition to motion for leave and revising same, related correspondence wi
Anna Haac	9/27/2020	0.5	paralegal re: filing.
7 Hillia 11aac	3/2//2020	0.5	Finalizing opposition to motion for leave to file sur-reply, editing draft order, internal
Anna Haac	9/28/2020	0.5	correspondence re: same.
Anna Haac	9/28/2020	2.2	Mediation calls with Court and correspondence with co-counsel re: same.
Anna Haac	3/26/2021	1.0	Reviewing class certification decision, correspondence with co-counsel re: same.
Anna Haac	3/30/2021	1.0	Call with co-counsel re: class certification decision and next steps.
Anna Haac	4/9/2021	0.1	Reviewing email re: class notice.
Anna Haac	4/15/2021	0.1	Correspondence with co-counsel re: class notice.
Aima Haac	4/13/2021	0.1	Researching class data, correspondence with settlement administrator and co-counsel re: notice
Anna Haac	4/23/2021	2.3	plan, follow up with assignment for associate to draft motion for same.
Anna Haac	4/26/2021	0.3	Reviewing example notice plan, correspondence internally re: same.
Anna Haac	4/27/2021	0.3	Call with opposing counsel re: notice, follow up internally about drafting same.
Anna Haac	4/30/2021	0.7	Internal correspondence re: notice motion.
			-
Anna Haac	5/4/2021	0.5	Internal correspondence re: motion for notice.  Internal correspondence re: notice cost research findings, reviewing notice plan.
Anna Haac	5/10/2021	0.5	
Anna Haac	5/11/2021	1.0	Review and edit notice plan.
Anna Haac	5/13/2021	0.5	Call re: notice plan.
Anna Haac	5/24/2021	1.3	Review and edit scheduling proposal.
Anna Haac	5/24/2021	0.5	Call with co-counsel re: notice plan and summary judgment strategy.
Anna Haac	5/25/2021	6.0	Editing discovery status report and related internal correspondence.
			Revising notice plan and request for schedule, research and correspondence internally and with
Anna Haac	5/26/2021	3.7	co-counsel re: same.
Anna Haac	5/27/2021	2.2	Finalizing notice plan and status report to send to opposing counsel, related review of discover
Anna Haac	6/3/2021	1.5	Call internally and with OC re: case next steps and class notice.
Anna Haac	6/14/2021	0.5	Reviewing notice and responding to comments.
Anna Haac	8/13/2021	1.0	Correspondence with co-counsel re: summary judgment strategy and analysis.
Anna Haac	9/3/2021	0.8	Weekly team call to discuss discovery responses and next steps.
Anna Haac	9/3/2021	0.5	Reviewing 30(b)(6) notice and related correspondence with team.
Anna Haac	9/3/2021	0.1	Reviewing M&C correspondence with opposing counsel.
Anna Haac	9/8/2021	1.0	M&C with opposing counsel, follow-up with co-counsel.
Anna Haac	9/13/2021	3.6	Reviewing ROG responses and correspondence internally and with co-counsel re: same.

Timekeeper	Date	Time	Description
	0/14/2024		Reviewing production and past productions, comparing APR term, correspondence with co-
Anna Haac	9/14/2021	0.5	counsel re: same.
Anna Haac	9/16/2021	1.0	Call with H. Zavareei to prep for settlement discussion with OC and follow-up re: same.
	0/15/0001	2.0	Reviewing bankruptcy and ESI/search term correspondence, team meeting re: recap of various
Anna Haac	9/17/2021	3.8	discovery calls and talking through discovery issues.
	10/4/2021	1.0	Team call to discuss fifth third discovery responses and next steps, motion for bifurcation and
Anna Haac	10/4/2021	1.0	response.
	10/4/2021	1.0	Reviewing fifth third discovery responses, SEC filings, motion for bifurcation, and 30(b)(6)
Anna Haac	10/4/2021	1.0	deposition objections in preparation for team call.
Anna Haac	10/5/2021	0.5	Editing draft M&C email.
Anna Haac	10/6/2021	0.3	Reviewing draft opposition to motion for class trial.
Anna Haac	10/8/2021	0.8	M&C with opposing counsel, follow-up with co-counsel.
Anna Haac	10/8/2021	2.0	Drafting/editing opposition to motion for class trial.
Anna Haac	10/12/2021	1.5	Drafting opposition to motion for class trial.
Anna Haac	10/12/2021	0.5	M&C conference call.
Anna Haac	10/13/2021	1.4	Combining and editing opposition to motion to bifurcate.
Anna Haac	10/13/2021	0.3	Reviewing information and research pertaining to potential APR/TILA expert.
	10/12/2021	0.0	Reviewing productions, gathering 30(b)(6) materials, related correspondence internally and wi
Anna Haac	10/13/2021	0.8	co-counsel.
Anna Haac	10/15/2021	0.7	Team meeting, follow-up with opposing counsel re: discovery M&C.
Anna Haac	10/21/2021	2.0	Editing draft opposition to motion to bifurcate, related research.
Anna Haac	10/27/2021	0.3	Internal correspondence re: setting up document review platform and recent productions.
Anna Haac	10/29/2021	1.9	Team meeting re: 30(b)(6) preparation and strategy, related follow up.
Anna Haac	11/1/2021	0.8	M&C with OC.
			Reviewing 5/3 productions for 30(b)(6) deposition preparation, correspondence with co-couns
Anna Haac	11/2/2021	1.0	re: same.
Anna Haac	11/4/2021	0.1	Responding to co-counsel question re: upcoming 30(b)(6) deposition.
Anna Haac	11/5/2021	0.6	Reviewing reply re: trial plan.
Anna Haac	11/5/2021	0.6	Correspondence with expert re: loan data corruption issues.
Anna Haac	11/5/2021	4.5	30(b)(6) deposition.
			Case call to discuss 30(b)(6) deposition and other outstanding discovery, M&C efforts, and
Anna Haac	11/12/2021	1.0	summary judgment thoughts.
			Reviewing search terms and objections from opposing counsel, proposing edits to respon
Anna Haac	11/12/2021	0.4	re: same.
Anna Haac	11/12/2021	0.1	Following up with opposing counsel re: loan data corruption issues.
Anna Haac	11/15/2021	0.2	Reviewing files, correspondence internally re: same.
Anna Haac	11/16/2021	0.1	Review of M&C search term chart and related internal correspondence.
Anna Haac	11/16/2021	0.3	Correspondence with expert re: loan data files.
Anna Haac	11/29/2021	0.7	Team call re: outstanding discovery and M&C efforts.
Anna Haac	12/3/2021	1.6	Reviewing and editing discovery letter.
Anna Haac	12/5/2021	1.3	Editing discovery letter response.
			Correspondence with expert and co-counsel re: remaining discovery, reviewing schedule and
Anna Haac	12/7/2021	0.5	rules regarding same.
Anna Haac	12/9/2021	0.1	Internal correspondence re: Fifth Third productions.
Anna Haac	12/13/2021	0.2	Reviewing ROG responses and related correspondence with co-counsel.
Anna Haac	12/14/2021	2.5	Reviewing Fifth Third productions and related internal document review correspondence.
Anna Haac	12/14/2021	0.7	Call with co-counsel re: discovery deadlines, follow-up for same.
Anna Haac	12/15/2021	0.4	Email correspondence with document platform vendor, reviewing productions for same.
Anna Haac	12/17/2021	2.8	Review and edit supplemental discovery responses, correspondence with co-counsel re: same.
Anna Haac	12/17/2021	1.0	Document review platform training.
Anna Haac	12/19/2021	2.5	Reviewing deposition transcripts, editing ROG responses.
Anna Haac	12/20/2021	0.3	Correspondence with named plaintiff and co-counsel re: ROG responses.
Anna Haac	12/20/2021	0.4	Correspondence internally and with co-counsel re: document review.
			Preparing for team call, reviewing document platform, creating searches and identifying batch
Anna Haac	12/22/2021	0.3	for review.
Anna Haac	12/26/2021	0.1	Email with OC calendaring discovery meeting.
			Correspondence internally and with co-counsel re: case background information for document
Anna Haac	12/27/2021	0.1	review.
Anna Haac	12/29/2021	2.0	Reviewing documents, internal training for document reviewers on same.

Timekeeper	Date	Time	Description
	1/4/2022		Document review platform management, reviewing documents, related correspondence with co
Anna Haac	1/4/2022	1.4	counsel and opposing counsel.
Anna Haac	1/5/2022	0.2	Correspondence with OC re: discovery and follow-up with expert.
Anna Haac	1/6/2022	0.3	Call with OC re: discovery update.
A TT	1/6/2022	1.5	Reviewing hot documents, internal correspondence re: discovery status, drafting evidentiary stipulation.
Anna Haac Anna Haac	1/6/2022 1/7/2022	1.5	Call with opposing counsel re: discovery status.
		0.5	Internal correspondence re: document review.
Anna Haac Anna Haac	1/11/2022 1/12/2022	2.6	Correspondence with OC re: damages export report issues, discussion with expert re: same.
	1/12/2022	4.2	APR/TILA expert report, internal correspondence re: same.
Anna Haac Anna Haac	1/12/2022	0.5	Reviewing documents produced by Fifth Third.
Anna Haac Anna Haac	1/13/2022	0.3	Correspondence with A. Olsen re: loan data update and editing report.
Anna Haac Anna Haac	1/13/2022	1.5	Correspondence internally and with co-counsel re: A. Olsen expert opinion draft.
		0.1	Correspondence with OC re: discovery deadlines.
Anna Haac	1/18/2022	0.1	Correspondence with OC re: discovery deadlines.
Anna Haac	1/18/2022	0.2	Reviewing documents from Fifth Third production, related correspondence with co-counsel.
Anna Haac	1/18/2022	2.0	Simkovic expert report.
Аппа наас	1/18/2022	2.0	Reviewing and edit draft consent motion for extension of deadlines, related correspondence wi
A II	1/10/2022	1.0	opposing counsel and co-counsel.
Anna Haac	1/19/2022	1.0	Simkovic expert report.
Anna Haac	1/20/2022	5.5	
Amma III.a.a	1/21/2022	2.0	Team call to discuss revised expert report and strategy, as well as other outstanding discovery
Anna Haac	1/21/2022	3.9	questions, related follow-up and research.
	2/0/2022	2.6	Reviewing expert report and related research, correspondence with co-counsel discussion
Anna Haac	2/8/2022	2.6	same.
	2/0/2022	2.4	Review and edit revised summary judgment motion, correspondence with co-counsel discussin
Anna Haac	2/8/2022	3.4	same.
Anna Haac	2/9/2022	0.7	Editing summary judgment motion.
Anna Haac	2/10/2022	3.5	Editing summary judgment motion.
Anna Haac	2/11/2022	0.6	Research for summary judgment motion, correspondence with paralegal re: same.
Anna Haac	2/18/2022	1.7	Call with Simkovic.
			Internal correspondence re: upcoming status conference, document review status, issues, and
Anna Haac	2/18/2022	2.2	analysis needed, summary judgment finalization.
A TT	2/21/2022	0.7	Reviewing and responding to correspondence with expert, re: summary judgment, and docume
Anna Haac	2/21/2022	0.7	issues.
Anna Haac	2/22/2022	2.3	Reviewing summary judgment motion edits and related hot documents.
A TT	2/22/2022	1.5	Status conference with court, follow up with co-counsel re: outstanding expert discovery items
Anna Haac	2/22/2022	1.5	summary judgment next steps, and recap of call with court/follow up items.
Anna Haac	2/22/2022	0.6	Review Simokovic expert report.
Anna Haac	2/23/2022	0.4	Reviewing prior A. Olsen expert report, correspondence re: same.
Anna Haac	2/25/2022	0.4	Olsen expert report.
Anna Haac	2/28/2022	0.8	Call with OC and related follow up.
Anna Haac	3/1/2022	0.2	M&C with OC re: discovery schedule.
. **	2/1/2022	0.5	Research for motion to compel privileged communications and related correspondence with co
Anna Haac	3/1/2022	0.5	counsel.
Anna Haac	3/2/2022	0.5	Call with Simokovic.
Anna Haac	3/2/2022	0.4	Call re: 5/3 document review.
A TT	2/2/2022	0.2	Reviewing draft proposed order extending deadlines and related trial scheduling corresponden
Anna Haac	3/2/2022	0.2	with co-counsel.
. **	2/4/2022	1.0	Call with co-counsel to discuss expert reports, open items for summary judgment motion, and
Anna Haac	3/4/2022	1.0	outstanding discovery items.
Anna Haac	3/7/2022	1.3	A. Olsen expert report.
Anna Haac	3/8/2022	1.0	Internal correspondence re: hot does and deposition preparation/subpoenas.
Anna Haac	3/8/2022	5.0	Olsen expert report, reviewing correspondence and related research for same.
	2/2/25==	2 -	Olsen expert report and related correspondence with expert, co-counsel, and
Anna Haac	3/9/2022	3.5	internally.
Anna Haac	3/9/2022	0.2	Editing notice of subpoena to B. Howard.
Anna Haac	3/9/2022	0.7	Correspondence internally and with opposing counsel re: document review status and overlay.
Anna Haac	3/10/2022	1.0	Correspondence with OC re: expert stipulation, follow-up internally and with co-counsel.
Anna Haac	3/11/2022	0.5	Internal correspondence re: good faith defense.
Anna Haac	3/14/2022	1.1	Review and edit of demand letter, related internal correspondence.

Timekeeper	Date	Time	Description
Anna Haac	3/15/2022	1.1	Final review of summary judgment motion, correspondence internally re: strategy for same.
Anna Haac	3/16/2022	0.6	Reviewing edits to and further edit of demand letter.
	2/16/2022		Reviewing expert email re: data issues and related correspondence with expert, drafting follow-
Anna Haac	3/16/2022	1.7	up to OC.
Anna Haac	3/16/2022	1.7	Finalizing summary judgment motion.
Anna Haac	3/17/2022	1.7	Team call re: various outstanding summary judgment, settlement demand, and discovery items.
Anna Haac Anna Haac	3/17/2022	0.1	Internal correspondence re: summary judgment, settlement demand, and discovery items.
Anna Haac Anna Haac	3/19/2022	0.1	Internal correspondence re: B. Howard deposition and calling witness.
Anna Haac	3/24/2022	0.4	Internal correspondence re: document review status and next steps.
Anna Haac	3/30/2022	0.3	Internal correspondence re: summary judgment filing and deposition of B. Howard.
Anna Haac	3/30/2022	0.3	Internal correspondence re: subpoena invoices.
Anna Haac	4/1/2022	0.7	Team call re: upcoming discovery and outstanding items and related internal follow-up.
Allia Haac	4/1/2022	0.7	Final review and edit of summary judgment motion, correspondence internally and with defense
Anna Haac	4/20/2022	3.5	counsel regarding sealing of exhibits and redactions.
Aillia Tiaac	4/20/2022	3.3	Final editing of summary judgment brief, final editing of exhibits, correspondence internally and
Anna Haac	4/21/2022	5.0	with opposing counsel re: finalizing summary judgment motion and sealing exhibits.
Anna Haac	4/22/2022	3.3	Kappes deposition, reviewing outline for same, drafting questions to ask.
Ailia Haac	4/22/2022	3.3	Final review and edit of motion to seal and proposed orders for same, as well as for summary
Anna Haac	4/22/2022	3.0	judgment, QC filing packet.
Anna Haac	4/22/2022	0.5	Call with A. Olsen re:
Anna Haac	4/28/2022	4.0	Depositions of T. Carpenter and Erhardt.
7 Hilla 1 Idae	1/20/2022	1.0	Depositions of 1. Curponer and Emarca.
Anna Haac	4/28/2022	1.7	Reviewing A. Olsen expert report revisions and related correspondence with expert re: same.
7 tima 11aac	1/20/2022	1.7	Terroring II. O Bell expert report revisions and related correspondence with expert re. Same.
Anna Haac	5/3/2022	0.7	Team call and internal correspondence re: upcoming B. Howard deposition and demand letter.
Anna Haac	5/4/2022	2.8	Building out trial story board, analyzing expert report in connection with same.
711110 11000	37 17 2022	2.0	Final review/edit of A. Olsen expert report, related correspondence with co-counsel re: expert
Anna Haac	5/16/2022	0.8	reports.
		***	Review supplement to P. Oliver expert report, review additional edits to A. Olsen report, review
			comments/questions to Simkovic report, correspondence internally, with co-counsel, and with
Anna Haac	5/17/2022	1.9	expert re: finalizing expert reports.
			Call with Simkovic re: expert , related correspondence with co-counsel and defense
Anna Haac	5/19/2022	1.7	counsel.
Anna Haac	5/24/2022	0.5	Correspondence internally and with expert re: content of rebuttal report.
Anna Haac	5/25/2022	7.4	expert rebuttal reports.
Anna Haac	5/27/2022	0.7	Biweekly team call.
			Correspondence with expert Simkovic re: remaining work to be done, reviewing defense expert
			reports, related correspondence internally and with co-counsel regarding potential areas of
Anna Haac	5/31/2022	3.6	rebuttal expertise needed.
			Reviewing defense expert reports, call with potential rebuttal expert, related correspondence with
Anna Haac	6/1/2022	7.3	our experts and co-counsel.
			Call with experts, related compilation of notes from review of expert reports
Anna Haac	6/2/2022	4.0	follow-up re: same.
Anna Haac	6/3/2022	0.7	Correspondence with co-counsel re: expert reports.
Anna Haac	6/7/2022	0.4	Reviewing expert engagement letter and related internal correspondence.
Anna Haac	6/13/2022	0.2	Correspondence with TILA expert, reviewing report of same.
Anna Haac	6/16/2022	2.5	expert report, correspondence with co-counsel re: same.
Anna Haac	6/17/2022	1.2	Team call to discuss expert reports.
Anna Haac	6/17/2022	5.2	expert reports and related internal correspondence.
Anna Haac	6/20/2022	0.4	Reviewing Simkovic expert report.
			Correspondence with opposing counsel, co-counsel, and experts re: scheduling depositions and
Anna Haac	6/27/2022	0.7	extension of related deadlines.
Anna Haac	6/30/2022	0.5	Correspondence with co-counsel and experts re: deposition availability and scheduling.
Anna Haac	7/1/2022	0.4	Correspondence internally and with opposing counsel re: expert scheduling.
			Reviewing rebuttal expert reports, correspondence with co-counsel and opposing counsel re:
Anna Haac	7/5/2022	4.0	scheduling and strategy of expert depositions.
Anna Haac	7/20/2022	1.0	Preparation of A. Olsen for deposition.
Anna Haac	7/21/2022	2.0	Defending deposition of A. Olsen.
Anna Haac	7/28/2022	1.5	Call with Dia to assist in preparation for Grice deposition.
Anna Haac	8/2/2022	3.3	Deposition of expert Green.

Timekeeper	Date	Time	Description
	0.10.10.00		Team call re: summary judgment division of labor and discussion of briefing and Daubert
Anna Haac	8/8/2022	1.2	strategy, related follow up.
Anna Haac	8/8/2022	0.4	Correspondence with Simkovic and co-counsel re:
Anna Haac	8/8/2022	0.3	Internal correspondence re: joint expense amounts.
Anna Haac	8/9/2022	4.5	Prep of expert Simkovic.
Anna Haac	8/11/2022	5.0	Deposition of Simkovic.
Amma IIaaa	9/24/2022	0.5	Daviagging aynances company and area intermelly as to have to handle reimburgement of some
Anna Haac Anna Haac	8/24/2022 8/25/2022	0.5 4.0	Reviewing expenses, correspondence internally as to how to handle reimbursement of same.  Reviewing summary judgment brief and related research of cases cited therein.
	_		Correspondence and review relating to expenses for litigation fund.
Anna Haac	8/30/2022 9/9/2022	0.6	Cataloguing research issues for summary judgment opposition.
Anna Haac Anna Haac	9/9/2022	6.0	Drafting and editing summary judgment opposition, research related to same.
Аша паас	9/1//2022	0.0	Reviewing correspondence from co-counsel re: class cert research needed, related internal
Anna Haac	9/19/2022	0.8	correspondence.
Anna Haac	9/20/2022	0.8	Internal correspondence re: research assignments needed for summary judgment briefing.
Anna Haac	9/20/2022	24.4	Drafting and editing summary judgment opposition, related correspondence internally.
Anna Haac	9/21/2022	1.6	Editing summary judgment opposition, related correspondence internally.
Anna Haac	9/23/2022	7.0	Review and edit summary judgment opposition.
Anna Haac	9/25/2022	6.4	Review and edit summary judgment brief and related internal correspondence.
Anna Haac Anna Haac	9/26/2022	11.7	Editing summary judgment opposition.
Allia Haac	312112U22	11./	Leating summary Juagment opposition.
Anna Haac	9/28/2022	4.5	Drafting and editing summary judgment brief, research for same, related internal corresponde
Anna Haac Anna Haac	9/28/2022	5.8	Research for and editing of SMJ opp'n brief, correspondence with co-counsel re: same.
лина Паас	712712022	3.8	research for and enting of Sivis opp it offer, correspondence with co-counselfer same.
Anna Haac	9/30/2022	4.5	Drafting and editing summary judgment opposition, correspondence with co-counsel re: sam
Aima Haac	913012022	4.3	Drafting summary argument section and other editing summary judgment opposition, review
Anna Haac	10/3/2022	6.2	research and correspondence with co-counsel re: same.
Anna Haac Anna Haac	10/3/2022 10/4/2022	0.2	Correspondence with co-counsel re: reply brief ISO SMJ.
Allia Haac	10/4/2022	0.2	correspondence with co-counsel re, repry offer 150 51913.
Anna Haac	10/7/2022	26	Reviewing summary judgment opp'n brief and drafting reply ISO same, call with co-counsel.
Anna Haac Anna Haac	10/7/2022	3.6 0.8	Drafting summary judgment opp it brief and drafting repty 15O same, can with co-counsel.
Anna Haac Anna Haac		1.0	Reviewing SMJ opp'n, drafting reply.
Anna Haac Anna Haac	10/17/2022 10/18/2022	3.0	Drafting reply SMJ brief.
лина Паас	10/10/2022	3.0	Diateng repty onto.
Anna Haac	10/19/2022	5.3	Review and editing draft SJM reply, reviewing research and internal correspondence re: same
Anna Haac	10/19/2022	0.2	Correspondence with co-counsel re: draft brief, forwarding same.
Anna Haac	10/20/2022	1.0	Call to discuss summary judgment brief reply, edits and thoughts re: same.
Anna Haac	10/21/2022	1.0	Reviewing edits to summary judgment reply, internal correspondence re: same.
Anna Haac	11/2/2022	7.4	Editing summary judgment brief and reviewing exhibits for same, related research.
Anna Haac Anna Haac	12/1/2022	0.1	Internal correspondence re: trial prep.
Anna Haac	12/1/2022	1.2	Internal correspondence re: trial prep and strategy, follow up with trial tech for same.
	12/13/2022	1.0	Internal correspondence re: trial prep and strategy, follow up with trial tech for same.  Internal correspondence re: trial strategy and planning, related follow up with trial tech.
Anna Haac Anna Haac	12/20/2022	1.0	Reviewing expert reports for potential Motions to Exclude.
Anna Haac Anna Haac	12/21/2022	1.1	Call with co-counsel re: trial strategy and planning.
Anna Haac Anna Haac	12/22/2022	0.8	Reviewing expert reports and creating outline for motions to strike.
Allia Haac	12/22/2022	0.0	Drafting email to paralegal re: gearing up for trial and documents that need to be collected/ta
Аппа Цааа	1/1/2023	0.4	that need to be completed.
Anna Haac Anna Haac	1/3/2023	0.4	Call re: expert report update and planning for trial.
Anna Haac Anna Haac	1/3/2023	1.0	Continuing review of expert reports and preparing outlines for Motions to strike.
лина паас	1/3/2023	1.0	Continuing review of expert reports and preparing outlines for Motions to strike.  Continuing review of expert reports and creating bullet outline for motions to strike with respect to the continuing review of expert reports and creating bullet outline for motions to strike.
Anno Hoos	1/4/2022	1 1	
Anna Haac	1/4/2023	4.4	to same.
Anno Hoos	1/5/2022	1.2	Internal correspondence received MII c and other trial tooks, related follow, we with trial took
Anna Haac Anna Haac	1/5/2023 1/5/2023	1.3	Internal correspondence re: expert MILs and other trial tasks, related follow-up with trial tecl Reviewing expert report and drafting high level outline for MIL.
лина паас	1/3/2023	1.4	
	1/6/2023	2.0	Reviewing expert report, drafting outline for MIL, corresponding internally re: research need
Anno II-a	1 1/b/2U23	3.0	and plan of action for completing same.  Reviewing settlement demand response and draft reply, editing same and related corresponde
Anna Haac	1.0.2025		
		0.0	
Anna Haac	1/6/2023	0.9	with co-counsel.
		0.9	

Timekeeper	Date	Time	Description
			Correspondence with experts, reviewing trial and other schedules, assigning deposition review of
Anna Haac	1/9/2023	1.2	witnesses.
Anna Haac	1/10/2023	0.5	Internal correspondence re: defendant's proposed schedule and deadlines leading up to trial.
Anna Haac	1/10/2023	1.5	Reviewing expert report and drafting summary outline of points to include in MIL.
A TT	1/11/2022	0.5	
Anna Haac	1/11/2023	0.5	Correspondence with co-counsel re: settlement demand and response, review and edit reply.
Anna Haac	1/11/2023	2.0	Reviewing expert reports and drafting outlines for MILs.
Anna Haac	1/11/2023	1.8	Reviewing schedule and internal correspondence re: same.
. **	1 /1 2 /2 2 2	2.5	Reviewing expert report and drafting outline for MIL, meet internally re: research update,
Anna Haac	1/12/2023	3.7	reviewing same.
	1 /1 2 /2 2 2	2.0	Team call re: trial preparation, research related to proposed stipulation regarding exchange of
Anna Haac	1/13/2023	3.0	materials, correspondence internally and with OC re: same.
Anna Haac	1/17/2023	4.5	Reviewing expert reports and creating summary outline for MIL.
Anna Haac	1/19/2023	0.5	Reviewing analytics re: excluding experts and related internal correspondence.
Anna Haac	1/19/2023	1.0	Court CMC and preparation for same.
Anna Haac	1/24/2023	5.0	Drafting motions to exclude Grice/Green and related research.
Anna Haac	1/25/2023	5.0	Drafting Grice/Green expert MIL and reviewing related research.
Anna Haac	1/31/2023	1.0	Drafting MIL for Grice & Green.
Anna Haac	1/31/2023	0.6	Correspondence with experts and plaintiff re: upcoming trial.
Anna Haac	2/2/2023	0.1	Following up re: edits to Grice/Green expert MILs.
Anna Haac	2/3/2023	0.2	Correspondence with co-counsel re: Grice/Green expert MIL.
Anna Haac	2/5/2023	2.7	Drafting MIL re: APR experts.
Anna Haac	2/6/2023	1.3	Drafting MIL re: APR experts.
Anna Haac	2/7/2023	1.7	Reviewing edits to MIL.
Anna Haac	2/7/2023	2.4	Drafting APR Expert MIL.
Anna Haac	2/7/2023	0.5	Reviewing research for expert MILs.
Anna Haac	2/14/2023	0.5	Drafting MIL re: Grice & Green.
Anna Haac	2/15/2023	2.5	Drafting MIL re: APR experts.
Anna Haac	2/17/2023	1.8	Team meeting re: trial assignments, schedule, focus group follow-up.
Anna Haac	2/17/2023	0.5	Reviewing MIL topics, researching past cases for MILs, related internal correspondence.
Anna Haac	2/17/2023	3.5	Drafting MIL re: Grice/Green experts.
Anna Haac	2/18/2023	4.0	Drafting MILs re: APR experts.
Anna Haac	2/19/2023	2.2	Drafting MILs re: APR experts.
Anna Haac	2/20/2023	6.9	Reviewing legal research for MIL re: APR experts, drafting same.  Final review and edit of Daubert MILs.
Anna Haac	2/21/2023	5.5	
Anna Haac	2/22/2023	4.0	Finalizing MIL re: APR experts, related internal correspondence.
Anna Haac	2/23/2023	1.0	Reviewing expert MILs filed by Defense counsel, correspondence with experts and internally resame.
Aima Haac	2/23/2023	1.0	Julie.
Anna Haac	2/24/2023	1.4	Team meeting to discuss MILs received and upcoming assignments, strategy, issues for trial.
Anna Haac	3/2/2023	0.5	Reviewing motion to strike.
Anna Haac	3/2/2023	0.1	Correspondence with client and co-counsel re: upcoming trial.
11111411444	5.2.2025	0.1	Trial prep meeting with trial team to discuss exhibits, jury instructions, motions in limine,
Anna Haac	3/3/2023	8.5	witness testimony and video designations, etc
	0.0.20		Reviewing and editing opp'n to motion to strike Simkovic, motion to strike Hart supplement,
Anna Haac	3/6/2023	3.5	correspondence with co-counsel and Art re: damages figures for second notice period.
Anna Haac	3/7/2023	2.5	Edits to Simkovic/Oliver MIL opp'n.
Anna Haac	3/8/2023	0.8	Reviewing MIL expert oppositions filed by Defendant.
Anna Haac	3/8/2023	1.4	Reviewing Simkovic video deposition and transcript for trial preparation.
	3/8/2023	0.4	Final review of Simkovic brief.
Аппа наас		0.7	Reviewing jury ROGs and other materials for trial preparation.
Anna Haac Anna Haac	3/9/2023		
Anna Haac	3/9/2023 3/9/2023	2.3	Reviewing Simkovic deposition video and transcript for trial preparation.
Anna Haac Anna Haac	3/9/2023	2.3	Reviewing Simkovic deposition video and transcript for trial preparation.  Internal meeting to discuss trial preparation.
Anna Haac	3/9/2023 3/9/2023		Internal meeting to discuss trial preparation.
Anna Haac Anna Haac Anna Haac	3/9/2023	2.3	Internal meeting to discuss trial preparation.  Correspondence internally and with co-counsel re: exhibits.
Anna Haac Anna Haac Anna Haac Anna Haac	3/9/2023 3/9/2023 3/10/2023	2.3 2.0 0.5	Internal meeting to discuss trial preparation.  Correspondence internally and with co-counsel re: exhibits.  Team meeting to discuss trial preparation, including jury instructions and interrogatories,
Anna Haac Anna Haac Anna Haac	3/9/2023 3/9/2023 3/10/2023 3/10/2023	2.3 2.0 0.5	Internal meeting to discuss trial preparation.  Correspondence internally and with co-counsel re: exhibits.  Team meeting to discuss trial preparation, including jury instructions and interrogatories, exhibits, designations and strategy.
Anna Haac	3/9/2023 3/9/2023 3/10/2023 3/10/2023 3/11/2023	2.3 2.0 0.5 2.2 1.5	Internal meeting to discuss trial preparation.  Correspondence internally and with co-counsel re: exhibits.  Team meeting to discuss trial preparation, including jury instructions and interrogatories, exhibits, designations and strategy.  Reviewing jury questionnaires.
Anna Haac Anna Haac Anna Haac Anna Haac Anna Haac	3/9/2023 3/9/2023 3/10/2023 3/10/2023	2.3 2.0 0.5	Internal meeting to discuss trial preparation.  Correspondence internally and with co-counsel re: exhibits.  Team meeting to discuss trial preparation, including jury instructions and interrogatories, exhibits, designations and strategy.

Timekeeper	Date		Description
Anna Haac	3/13/2023	0.5	Reviewing focus group videos.
Anna Haac	3/14/2023	2.0	Simkovic witness prep.
Anna Haac	3/14/2023	2.7	Reviewing and editing stipulations and jury instructions.
Anna Haac	3/16/2023	0.6	Reviewing deposition designations for Mendehlson and responding to questions about same.
Anna Haac	3/16/2023	1.0	Revising Simkovic outline.
Anna Haac	3/17/2023	4.0	Editing jury instructions.
Anna Haac	3/17/2023	1.5	Reviewing carpenter designations and related correspondence with co-counsel.
Anna Haac	3/17/2023	2.0	Call re: trial preparation.
Anna Haac	3/18/2023	8.5	Simkovic witness preparation, revising outline, meeting with expert.
Anna Haac	3/18/2023	1.0	Reviewing Fryock transcript.
Anna Haac	3/19/2023	5.4	Meet with Simkovic and revise direct examination outline in preparation for trial.
Anna Haac	3/20/2023	2.2	Review and edit final pretrial order.
Anna Haac	3/20/2023	2.0	Revising Simkovic outline.
Anna Haac	3/21/2023	2.5	Editing final pretrial order.
Anna Haac	3/22/2023	3.0	M&C with opposing counsel re: final pretrial order and call with co-counsel to prepare for same.
			Researching Hoffman objection and mediation status, editing final pretrial order, call with trial
Anna Haac	3/22/2023	2.5	tech and forwarding documents to same.
Anna Haac	3/22/2023	1.0	Call with trial tech re: preparing for trial.
Anna Haac	3/23/2023	5.3	Witness preparation for trial of M. Simkovic.
			Team meeting with trial strategist/technician to discuss case themes, organization, and witness
Anna Haac	3/24/2023	1.0	prep.
			Team meeting to discuss objections to exhibits and instructions, as well as overarching issues
Anna Haac	3/24/2023	3.4	following M&C with opposing counsel and strategy moving forward.
			Reviewing Howard deposition, TILA exhibits cited by Defendant, and Simkovic expert report for
Anna Haac	3/24/2023	2.0	incorporation into trial outline.
Anna Haac	3/25/2023	1.0	Working on revising Simkovic outline.
Anna Haac	3/26/2023	7.8	Witness prep with Simkovic.
Anna Haac	3/27/2023	3.0	Internal correspondence re: Olsen preparation, strategy discussion, follow-up on M&C items.
Anna Haac	3/28/2023	0.8	Review and edit final pretrial order, related correspondence.
Anna Haac	3/29/2023	3.0	Reviewing and analyzing summary judgment ruling, call with co-counsel re: same.
Anna Haac	5/1/2023	1.6	Call with co-counsel to discuss TILA motion for fees and JNOV/new trial motion.
Anna Haac	5/2/2023	1.0	Call to follow-up on action items re: TILA fees motion and JNOV/new trial motion.
Anna Haac	5/3/2023	0.3	Reviewing TILA fee motion research.
Anna Haac	5/7/2023	1.5	Drafting TILA fees motion.
Anna Haac	5/8/2023	2.0	Review research for fee motion and drafting same.
Anna Haac	5/16/2023	1.0	Research for call with re: TILA questions.
Anna Haac	6/2/2023	0.2	Internal correspondence re: fee petition.
Anna Haac	6/5/2023	0.5	Team call to discuss motion for attorneys' fees.
Anna Haac	6/5/2023	0.5	Call with OC re: TILA motion for attorneys' fees, and follow-up with co-counsel.
			Internal correspondence re: research needed for TILA motion for attorneys' fees and change in
Anna Haac	6/6/2023	1.4	strategy for same, related follow up with co-counsel.
Anna Haac	6/6/2023	3.0	Drafting motion for attorneys' fees.
Anna Haac	6/7/2023	4.0	Drafting motion for attorneys' fees.
			Correspondence with co-counsel re: reviewing billing records and related research as to how to
Anna Haac	6/8/2023	0.3	apportion time records by claim.
Anna Haac	6/9/2023	7.0	Drafting motion for attorneys fees and related research.
Anna Haac	6/9/2023	3.0	Categorizing time records for motion for attorneys' fees.
Anna Haac	6/9/2023	0.3	Drafting motion for attorneys fees and related research.
Anna Haac	6/10/2023	2.0	Categorizing time records for TILA motion for attorneys fees.
Anna Haac	6/11/2023	4.0	Categorizing time records for motion for attorneys fees, reviewing and editing same.
11440	5.11,2025		Editing TILA fee petition, reviewing expense records for same, related research and conference
Anna Haac	6/12/2023	11.0	calls with co-counsel.
Anna Haac	6/23/2023	0.1	Reviewing correspondence from opposing counsel re: extension.
Anna Haac	7/3/2023	0.6	Reviewing opposition to motion for TILA attorneys' fees.
1 mila 11aac	11312023	0.0	pro
Anna Haac	7/6/2023	0.3	Reviewing and responding to notes from S. Khader re: response to TILA fee petition opposition.
1 mila 11aac	11012023	0.5	Correspondence internally re: additional research needed and division of work for attorney fee
Anna Haaa	7/10/2022	0.5	
Anna Haac	7/10/2023	0.5	reply.

Timekeeper	Date	Time	Description 150 cm 150
Anna Haac	7/12/2023	1.0	Drafting reply ISO motion for attorneys' fees.
Anna Haac	7/13/2023	7.8	Drafting and editing reply ISO motion for attorneys' fees.
Anna Haac	7/15/2023	0.5	Reviewing edits to reply ISO motion for attorneys' feesl.
			Responding to questions re: finalizing reply brief ISO motion for attorneys' fees, final review of
Anna Haac	7/17/2023	1.0	same.
Anna Haac	7/25/2023	0.3	Internal correspondence re: next steps ISO fee petition.
Anna Haac	8/21/2023	3.7	Reviewing fee declaration from co-counsel, correspondence internally re: billing records,
Anna Haac	8/23/2023	4.8	Drafting/editing declaration ISO motion for attorneys' fees on TILA claim.
	0/24/2022	<i>5</i> 1	
Anna Haac	8/24/2023	5.1	Drafting declaration ISO motion for attorneys' fees and reviewing time records related to same
Anna Haac	8/25/2023	4.0	Drafting declaration ISO Motion for Attorneys' Fees.
Anna Haac	8/26/2023	3.0	Drafting declaration ISO fees, reviewing and categorizing time.
Anna Haac	8/27/2023	5.0	Drafting declaration ISO fees, reviewing and categorizing time.
	0/12/2022	2.2	Reviewing draft declaration ISO TILA fees, further review and categorization of expenses,
Anna Haac	9/13/2023	2.2	related internal correspondence.
Anna Haac	9/14/2023	0.5	Correspondence with co-counsel re: , editing declaration ISO fees.
Anna Haac	9/15/2023	1.3	Editing declaration ISO fees.
A TT	0/19/2022	1.2	Reviewing edits to fee declaration from co-counsel and research re:
Anna Haac	9/18/2023	1.2	correspondence.
Anna Haac	9/20/2023	1.3	Editing declaration ISO fees, reviewing additional time entries, related correspondence.
Anna Haac	9/21/2023	4.6	Editing declaration, reviewing co-counsel declarations and associated time records.
			Final review of edits to fee declaration and time and expense records, related research for cert
	0/22/2022	4.0	entries and internal correspondence re: same, external correspondence with co-counsel re:
Anna Haac	9/22/2023	4.0	declarations and exhibits, responding to questions re: finalizing same.
	0/25/2022	2.6	Correspondence with co-counsel and internally re: finalizing declaration ISO fees, work doing
Anna Haac	9/25/2023	2.6	same, including review of fee chart, review of co-counsel declarations and time/expenses.
			Reviewing co-counsel expenses and time records, correspondence related to same, reviewing
	0/26/2022	2.0	research and related correspondence, revising declaration
Anna Haac	9/26/2023	3.9	accordingly.
Anna Haac	10/4/2023	0.4	Reviewing article on attorney fee research.
A TT	10/0/2022	1.0	Reviewing motion to strike declaration ISO attorneys' fees, related internal correspondence re-
Anna Haac Anna Haac	10/9/2023	1.0 0.8	responding to same.  Reviewing research re: cost-shifting for expert fees.
Anna Haac	10/11/2023	5.0	Drafting opposition to motion to strike.
Anna Haac	10/12/2023	4.0	Drafting opposition to motion to strike.  Drafting opposition to motion to strike and related research.
Anna Haac	10/13/2023	2.0	Drafting opposition to motion to strike and related research.
Аппа наас	10/1//2023	2.0	Dratting opp it to motion to strike.
Anna Haac	10/18/2023	4.5	Reviewing research for and editing opp'n to motion to strike, internal correspondence re: same
Anna Haac	10/19/2023	1.2	Reviewing research from co-counsel, incorporating into draft brief.
Anna Haac	10/19/2023	0.4	Reviewing research re: , related internal correspondence.
Allia Haac	10/20/2023	0.4	Reviewing TILA fee research, editing brief, related correspondence internally and with co-
Anna Haac	10/23/2023	3.5	counsel.
Allia Haac	10/23/2023	3.3	Editing draft opp'n to motion to strike, reviewing research for same, and related corresponden
Anna Haac	10/24/2023	8.5	internally and with co-counsel.
Allia Haac	10/24/2023	6.3	Reviewing edits to brief, revising and incorporating suggestions accordingly, related research
Anna Haac	10/25/2023	1.5	correspondence internally and with co-counsel.
Anna Haac	10/26/2023	5.3	Editing opp'n to motion to strike, related research, related correspondence with co-counsel.
Allia Haac	10/20/2023	3.3	Additional research final review and related internal correspondence of
Anna Haac	10/27/2023	2.7	opposition to motion to strike.
Anna Haac	11/30/2023	0.2	Reviewing minute entries from court, related correspondence with co-counsel.
Anna Haac	12/1/2023	0.2	Reviewing court order re: TILA fee motion, related internal correspondence.
Anna Haac	12/4/2023	0.4	Reviewing 5/3's reply in support of motion to strike.
11111a 11aac	12/7/2023	0.2	Conference call with Court, preparation and follow-up for same, including related
			correspondence with co-counsel to discuss
			correspondence with co-counsel to discuss
Anna Haaa	12/11/2022	3.0	
Anna Haac	12/11/2023	3.0	Correspondence internally and with co-counsel re: preparing motion for attorneys' fees, related
Anna Haac	12/12/2023	0.9	review of discovery requests.
rima made	12/12/2023	0.7	· · ·
			Reviewing emails time sheets and evnences related
Anna Haac	12/15/2023	1.0	Reviewing emails time sheets and expenses , related internal correspondence.

Timekeeper	Date	Time	Description
,	10/10/200		Internal correspondence re: time sheets and expenses as well as and logistics for filing
Anna Haac	12/18/2023	1.8	review and edit of draft motion for fees.
Anna Haac	12/19/2023	5.8	Review and edit draft brief, related internal correspondence.
A TT	12/20/2022	2.1	Editing motion for fees, related review of supporting documentation and correspondence
Anna Haac	12/20/2023	3.1	internally and with co-counsel.  Continuing to edit draft motion for fees, reviewing edits from H. Zavareei, related internal
Anna Haac	12/21/2023	5.5	correspondence.
Connor Rowe	8/19/2022	0.3	Review recent filing; save to case file, circulate, and calendar as necessary.
Cort Carlson	9/20/2022	0.6	Onboarding meeting with Anna Haac regarding case status and research assignments
Cort Carison	912012022	0.0	Research law of the case doctrine for inclusion in Plaintiff's Opposition to Defendant's Motion
Cort Carlson	9/29/2022	2.1	for Summary Judgment
Cort Carlson	9/29/2022	0.9	Read revised draft of opposition to Defendant's motion for summary judgment.
Corr Curison	312312022	0.5	Call with co-counsel discussing argument strategy for opposition to Defendant's motion for
Cort Carlson	9/29/2022	1.4	summary judgment
	3.23.2022		Research law of the case doctrine for inclusion in Plaintiff's Opposition to Defendant's Motion
Cort Carlson	9/30/2022	0.5	for Summary Judgment
			Draft memo regarding notice requirements under Ohio law and Truth in Lending Act, including
Cort Carlson	10/18/2022	6.1	draft response to Defendant's opposition to motion for summary judgment
Cort Carlson	10/19/2022	0.3	Call with Anna to discuss research
Cort Carlson	10/20/2022	1.2	Review and edit combined draft reply
Cort Carlson	10/21/2022	0.7	Call to discuss reply brief
Cort Carlson	11/1/2022	0.1	Review draft reply to defendant's response to plaintiff's motion for summary judgment
			Review of case docs to onboard case: MSJ responses/replies; pattern jury instructions; prior
Cort Carlson	1/4/2023	3.2	settlement docs
Cort Carlson	1/4/2023	1.2	Review key depositions in preparation for motion drafting and designations for trial
			Phone conference with TZ trial team regarding trial exhibits, motions in limine, and general trial
Cort Carlson	1/5/2023	0.7	prep
Cort Carlson	1/5/2023	0.4	Review settlement correspondence from opposing counsel
Cort Carlson	1/6/2023	1.3	Trial prep strategy meeting (MILs, jury questionnaire, focus group)
Cort Carlson	1/6/2023	0.1	Review list of Barret 702 decisions
Cort Carlson	1/9/2023	3.2	Daubert motions research
G + G 1	1/12/2022	0.0	Material A. Harris 1.C. Code and a state and described and a state and described and d
Cort Carlson	1/12/2023	0.9	Meet with A. Haac and C. Carlson re: motions to exclude experts, research, reviewing transcrip
Cort Carlson	1/12/2023 1/12/2023	0.8	Design mini-mock trial in advance of focus group to determine best trial strategy  Review deposition transcripts in advance of trial preparation
Cort Carlson	1/12/2023		Phone conf w/co-counsel re: pretrial deadlines, motions in limine, witnesses/depo review
Cort Carlson	1/13/2023	1.2	Prione com w/co-counserte. pretriai deadinies, motions in infiline, witnesses/depo review
Cort Carlson	1/17/2023	6.0	Research case law on proper length and ambit of expert testimony as to the facts of the case
Cort Carlson	1/18/2023	1.1	Analyze case law findings in team meeting, draft motion in limine outlines
Cort Carlson	1/18/2023	4.6	Research case law on bases for excluding unreliable expert testimony
Cort Carison	1/10/2023	7.0	research case law on bases for excluding unremade expert testimony
Cort Carlson	1/18/2023	0.9	Phone conf w/A. Haac, C. Carlson re: R. 702 briefs, research findings/add'l research, outlines
Cort Carlson	1/19/2023	0.5	Conf w/co-counsel re: prep for status conference
Cort Carlson	1/19/2023	0.3	Create pre-trial list of asks to the court and co-counsel in advance of telephonic conference
Cort Carlson	1/20/2023	6.2	Research cases where Judge Barrett excluded expert testimony
Cort Carlson	1/22/2023	2.1	Research past motions to exclude expert testimony in the Southern District of Ohio.
Cort Carlson	1/23/2023	1.4	Draft citations for inclusion in motions in limine to exclude and limit expert testimony
			Discuss case law on bases for excluding expert testimony, motion in limine drafts, factual
Cort Carlson	1/24/2023	0.9	research into experts' backgrounds and qualifications
Cort Carlson	1/25/2023	0.5	Correspond about edits to motions in limine
Cort Carlson	2/13/2023	3.3	Analyze deposition transcript of Adam McKinney for preparation for and use in trial
Cort Carison	2/13/2023	2.5	
Cort Carlson	2/15/2023	2.2	Research when deposition testimony may be admitted in class actions
			Research when deposition testimony may be admitted in class actions  Draft motion in limine to exclude testimony of Defendant experts Grice and Green
Cort Carlson	2/15/2023	2.2	Draft motion in limine to exclude testimony of Defendant experts Grice and Green
Cort Carlson	2/15/2023	2.2	Draft motion in limine to exclude testimony of Defendant experts Grice and Green
Cort Carlson Cort Carlson	2/15/2023 2/21/2023	2.2 0.8	Draft motion in limine to exclude testimony of Defendant experts Grice and Green  Prepare for trial, including review of video deposition testimony, draft witness list, make attorn assignments, draft flow of case in chief and rebuttal case
Cort Carlson Cort Carlson	2/15/2023 2/21/2023	2.2 0.8	Draft motion in limine to exclude testimony of Defendant experts Grice and Green Prepare for trial, including review of video deposition testimony, draft witness list, make attorn
Cort Carlson  Cort Carlson  Cort Carlson	2/15/2023 2/21/2023 3/3/2023	2.2 0.8 4.0	Draft motion in limine to exclude testimony of Defendant experts Grice and Green  Prepare for trial, including review of video deposition testimony, draft witness list, make attorn assignments, draft flow of case in chief and rebuttal case  Trial preparation: draft jury verdict form; review video deposition designation strategy; discussions of the control of the c
Cort Carlson Cort Carlson Cort Carlson	2/15/2023 2/21/2023 3/3/2023	2.2 0.8 4.0	Draft motion in limine to exclude testimony of Defendant experts Grice and Green  Prepare for trial, including review of video deposition testimony, draft witness list, make attorn assignments, draft flow of case in chief and rebuttal case  Trial preparation: draft jury verdict form; review video deposition designation strategy; discuss stipulations with opposing party about exchanging trial materials during trial

Timekeeper	Date	Time	Description
Cont Conloan	2/17/2022	2.1	Final review of deposition designations, preliminary instructions, closing instructions, jury instructions, and other pre-trial related matters for exchange with defense counsel
Cort Carlson	3/17/2023	3.1	Compare defendant's TILA statutory/regulatory exhibit citations
Cort Carlson	3/27/2023	1.7	Compare defendant's TILA statutory/regulatory exhibit citations
Cort Carlson	3/28/2023	1.0	Draft motions in limine
Cort Carlson	3/29/2023	3.1	Draft language to lay foundation for exhibits at trial
Cort Curison	3/23/2023	5.1	Research Federal Rule of Civil Procedure 54 regarding fee motions
Cort Carlson	5/3/2023	0.3	ggg
			Research Federal Rule of Civil Procedure 54 regarding fee motions
Cort Carlson	5/3/2023	2.5	
Cort Carlson	5/4/2023	3.4	Research fee motions under Truth in Lending Act
Cort Carlson	5/5/2023	2.8	Research and draft memo on Fifth Third fee motion on appeal
Cort Carlson	5/8/2023	0.8	fee motion research
			Draft motion for attorneys' fees (1.5); research
			(2.5); review lodestar and cost calculations
Cort Carlson	6/12/2023	3.8	(0.5).
Cort Carlson	8/22/2023	0.4	Discuss motion for attorney's fees
Cort Carlson	9/15/2023	5.6	Research Sixth Circuit rulings on attorneys' fees
Cort Carlson	10/11/2023	1.10	Research availability of under TILA
Cort Carlson	10/17/2023	6.00	Research and draft response to Fifth Third's motion to strike
Cort Carlson	10/18/2023	0.70	Discuss research regarding attorneys' fees and response to defendants' motion to strike
Cort Carlson	10/22/2023	2.50	Research arguments to support attorneys' fee request in TILA context
			Discuss research and draft response to motion to strike with A. Haac (0.2); research case re
Cort Carlson	10/23/2023	3.70	motion to strike response (3.5)
Cort Carlson	10/24/2023	4.00	Distinguish cases defendant relies on in its motion to strike
			Review transcripts and jury instructions
Cort Carlson	10/25/2023	1.70	
Cort Carlson	10/26/2023	3.50	Draft opposition to Fifth Third's motion to strike
Cort Carlson	10/27/2023	1.50	Edit draft opposition to Fifth Third's motion to strike
			Meet with team to discuss upcoming scheduling conference (1.0); status conference (0.5); post-
Cort Carlson	12/11/2023	2.50	conference call with team to discuss attorneys' fee motion (1)
Cort Carlson	12/13/2023	3.40	Review billing entries and make cuts for reasonableness
			Review expense reports and submit memo proposal for to co-counsel (0.4);
Cort Carlson	12/19/2023	1.50	review billing entries (1.1)
			Review corr. regarding fee and costs filing (0.3); draft response to A. Haac's email re caselaw of
			costs properly awarded (0.3); ensure redactions are applied to time entries, and review billing
Cort Carlson	12/21/2023	6.60	entries and expense sheets (4.5); review and edit declaration (1.5)
Dana Gillis	9/25/2023	0.6	Filing. Communicating re filing.
Dana Gillis	9/25/2023	0.9	Call with A. Haac and L. Zhu regarding case filing. Call with L. Zhu.
Dana Gillis	9/25/2023	0.6	Call with E. Bass, E. Schilp, and L.Zhu regarding fililng.
David Lawler	11/29/2021	0.4	Coordinate document production upload with Disco.
David Lawler			E 1 21 21 D: 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	12/13/2021	0.2	Exchange emails with Disco re: document production and upload issues.
David Lawler	12/13/2021 12/15/2021	0.2 0.2	Exchange emails with Disco re: document production and upload issues.  Exchange email with TZ team re: uploading issues with document production.
			1 1
David Lawler	12/15/2021	0.2	Exchange email with TZ team re: uploading issues with document production.
David Lawler David Lawler	12/15/2021 12/22/2021	0.2 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.
David Lawler David Lawler David Lawler	12/15/2021 12/22/2021 12/27/2021	0.2 1.0 1.8	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.
David Lawler David Lawler David Lawler David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021	0.2 1.0 1.8 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14)
David Lawler David Lawler David Lawler David Lawler David Lawler David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021	0.2 1.0 1.8 1.0 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021	0.2 1.0 1.8 1.0 1.0 1.5	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/2/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14)  Review assigned documents (production 14)  Review assigned documents (production 14)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/2/2022 1/3/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/2/2022 1/3/2022 1/4/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0 1.0 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/2/2022 1/3/2022 1/4/2022 1/5/2022 1/6/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0 1.0 1.0 1.8 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 19)
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/3/2022 1/4/2022 1/5/2022 1/6/2022 1/7/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0 1.0 1.0 1.8 1.0 1.8 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14 and 19)  Review assigned documents (production 19)  Review assigned documents Relativity.  Review assigned documents Relativity.
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/3/2022 1/4/2022 1/6/2022 1/7/2022 1/11/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0 1.0 1.8 1.0 1.2 0.8 3.2	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 19)  Review assigned documents Relativity.  Review assigned documents Relativity.  Review assigned documents Relativity (production 12).
David Lawler	12/15/2021 12/22/2021 12/27/2021 12/29/2021 12/29/2021 12/30/2021 1/1/2022 1/3/2022 1/4/2022 1/5/2022 1/6/2022 1/7/2022	0.2 1.0 1.8 1.0 1.0 1.5 1.0 1.0 1.0 1.8 1.0 1.8 1.0	Exchange email with TZ team re: uploading issues with document production.  Attend team call re: doc review platform and plan.  Review class cert briefing; review 30(b)(6) depo transcript re: doc review.  Teams call with Anna re: brief of the case and doc review plan and process.  Review documents on Disco (Production 14)  Review assigned documents (production 14 and 19)  Review assigned documents (production 19)  Review assigned documents Relativity.  Review assigned documents Relativity.

Timekeeper	Date	Time	Description
David Lawler	1/18/2022	4.2	Review assigned documents (production 12) in Disco.
David Lawler	1/19/2022	4.8	Review assigned documents (production 12) in Disco.
David Lawler	1/20/2022	4.8	Review assigned documents (production 12) in Disco.
David Lawler	1/21/2022	2.6	Review assigned documents (production 12) in Disco.
David Lawler	1/23/2022	1.6	Review assigned documents (production 12) in Disco.
David Lawler	1/24/2022	3.8	Review documents in Disco (Production 13).
David Lawler	1/24/2022	1.2	Review documents in Disco (production 12).
David Lawler	1/24/2022	0.5	T.c. with A. Haac re: wholistic review assignment.
David Lawler	1/25/2022	4.2	Review documents in Disco (Production 13).
David Lawler	1/26/2022	4.8	Review documents in Disco (Production 13).
David Lawler	1/27/2022	3.8	Review documents in Disco (Production 13).
David Lawler	1/28/2022	1.8	Review documents in Disco (Production 20).
David Lawler	1/29/2022	2.4	Review documents in Disco (Production 20).
David Lawler	1/30/2022	1.6	Review documents in Disco (Production 20).
David Lawler	1/31/2022	2.7	Review documents in Disco (Production 20).
David Lawler	2/1/2022	3.4	Review documents in Disco (Production 20).
David Lawler	2/2/2022	3.3	Review documents in Disco (Production 20).
David Lawler	2/3/2022	3.4	Review documents in Disco (Production 20).
David Lawler	2/4/2022	2.4	Review documents in Disco (Production 20).
David Lawler	2/6/2022	2.0	Review documents in Disco (Production 20).
David Lawler	2/7/2022	3.2	Review documents in Disco (Production 20).
David Edwici	LITIZOZZ	3.2	Confer with A. Haac; review TILA docs re:  draft emai
David Lawler	2/9/2022	0.6	memo to A. Haac and forward documents.
David Lawler  David Lawler	2/9/2022	3.2	Review documents in Disco (Production 20/22).
David Lawler			Review documents in Disco (Production 20/22).
	2/10/2022	3.6	Review documents in Disco (Production 20/22).  Review documents in Disco (Production 20/22).
David Lawler	2/12/2022	3.5	
David Lawler	2/15/2022	1.2	Review assigned documents in Disco.
D 117 1	2/10/2022		Conference call with A, Haac, and A. McReynolds re: status and plan for hot doc review and
David Lawler	2/18/2022	0.5	plan for unreviewed documents.
David Lawler	2/18/2022	3.6	Review documents in Relativity.
David Lawler	2/19/2022	6.7	Review assigned documents in Disco.
David Lawler	2/20/2022	3.4	Review assigned documents in Disco. (1of2)
David Lawler	2/20/2022	3.6	Review assigned documents in Disco. (2of2)
David Lawler	2/22/2022	2.6	Review assigned documents in Disco.
David Lawler	2/23/2022	3.8	Review assigned documents in Disco.
David Lawler	2/24/2022	3.2	Review assigned documents in Disco.
David Lawler	3/2/2022	3.0	Review and code assigned documents in Disco. (Stu's)
David Lawler	3/3/2022	2.7	Review and code documents in Dsco (Stu's).
David Lawler	3/7/2022	1.8	Review and code documents in Disco (Stu's).
David Lawler	3/8/2022	0.5	Teams meeting with Aaron and Anna regarding status and chronology and related matters.
David Lawler	3/8/2022	3.0	Review and code assigned documents in Disco.
David Lawler	3/9/2022	3.4	Review and code assigned documents in Disco (Stu).
David Lawler	3/10/2022	3.5	Review and code assigned documents in Disco
David Lawler	3/11/2022	2.2	Review and code documents in Disco (unreviewed remainder)
David Lawler	3/12/2022	2.4	Review and code documents in Disco (unreviewed remainder)
David Lawler	3/14/2022	2.5	Review and code documents in Disco (unreviewed remainder)
David Lawler	3/15/2022	2.0	Review and code documents in Disco (unreviewed remainder)
David Lawler	3/16/2022	2.4	Review and code documents in Disco (unreviewed remainder)
David Lawler	3/17/2022	2.2	Review documents Disco (unreviewed remainder)
David Lawler	3/19/2022	4.2	Review documents Disco (unreviewed remainder)
David Lawler	3/20/2022	2.5	Review documents Disco (unreviewed remainder)
David Lawler  David Lawler	3/20/2022	2.2	Review documents Disco (unreviewed remainder)
	+		Review documents Disco (unreviewed remainder)  Review documents Disco (unreviewed remainder)
David Lawler	3/22/2022	3.0	
David Lawler	3/23/2022	3.8	Review documents Disco (unreviewed remainder)
David Lawler	3/24/2022	2.2	Review documents Disco (unreviewed remainder)
David Lawler	3/25/2022	1.8	Review documents Disco (unreviewed remainder)
David Lawler	3/26/2022	2.7	Review documents Disco (unreviewed remainder)
David Lawler	3/28/2022	1.8	Review documents Disco (unreviewed remainder)
Dovid Lovylor	4/8/2022	0.6	Review draft chronology. Teams call with Aaron re: same.
David Lawler David Lawler	4/9/2022	2.5	Review hot documents re: chronology.

Timekeeper	Date	Time	Description Review hot documents re: chronology.
David Lawler	4/11/2022	1.4	
David Lawler	4/12/2022	2.4	Work on hot docs Chronology
David Lawler	1/25/2023	0.3	Exchange emails with Disco re: billing.
Dia Rasinariu	4/23/2021	0.5	Communicate with A Haac regarding background of the case and motion for approval of notice
Dia Rasinariu	4/27/2021	0.4	Meet and confer regarding motion to approve notice and discovery for notice.
Dia Rasinariu	4/29/2021	3.4	Draft plaintiff's proposed notice plan.
Dia Rasinariu	5/4/2021	0.4	Communicate with A Haac regarding notice plan.
Dia Rasinariu	5/4/2021	1.0	Draft propose notice plan.
Dia Rasinariu	5/5/2021	2.0	Draft plaintiff's proposed notice plan.
Dia Rasinariu	5/10/2021	0.2	Communicate with A Haac regarding notice plan.
Dia Rasinariu	5/12/2021	0.2	Review H Zavareei edits to notice plan.
Dia Rasinariu	5/13/2021	0.3	Communicate with H Zavareei and A Haac regarding revising notice plan.
Dia Rasinariu	5/18/2021	2.0	Revise draft notice plan.
Dia Rasinariu	5/18/2021	0.8	Team call regarding defendant's proposed scheduling plan.
D. D	5/24/2021	0.6	Call with H Zavarrei, A Haac, S Scott, J Whittemore, and D Landsowne regarding revisions to
Dia Rasinariu	5/24/2021	0.6	notice plan.  Review and file emails from team.
Dia Rasinariu	5/24/2021	0.1	
Dia Rasinariu	5/24/2021	0.5	Revise notice plan.
Dia Rasinariu	5/26/2021	0.6	Review and revise notice plan.  Team call in preparation for meet and confer.
Dia Rasinariu	6/3/2021	0.5	
Dia Rasinariu	6/3/2021	1.1	Meet and confer regarding notice plan and case management.
Dia Rasinariu	6/14/2021	4.7	Revise motion for summary judgment.
Dia Rasinariu	6/15/2021	0.1	Review edits to long-form notice.
Dia Rasinariu	6/16/2021	0.2	Revise motion for summary judgment.
Dia Rasinariu	6/21/2021	0.2	Review and organize emails from team.  Revise notice plan and declaration to incorporate edits from defendant.
Dia Rasinariu	6/29/2021	0.5	-
			Review defendant's edits to notice plan, declaration in support of notice plan, and long form
Die Designation	6/20/2021	1 2	notice; coordinate with administrator to finalize declaration; coordinate with A Reynolds to
Dia Rasinariu	6/30/2021	1.3	finalize notice plan and supporting documents for filing.
Dia Rasinariu	8/3/2021	1.1	Team call regarding status of case and status of motion for summary judgment.  Draft discovery deficiency letter.
Dia Rasinariu Dia Rasinariu	8/10/2021	1.0 0.5	Revise draft discovery deficiency letter.
	8/11/2021	1.0	Team meeting regarding outstanding discovery and moving for summary judgment.
Dia Rasinariu Dia Rasinariu	8/13/2021 8/16/2021	0.9	Revise and finalize discovery deficiency letter.
Dia Rasinariu	8/17/2021	0.9	Communicate with H Zavareei regarding plan for notice and discovery
Dia Rasinariu	8/18/2021	0.2	Review and revise requests for production and interrogatories.
Dia Kasiliariu	6/16/2021	0.5	Email team regarding identifying experts and setting up regular status checks; review discover
Dia Rasinariu	8/19/2021	0.6	requests and responses.
Dia Kasiliariu	6/19/2021	0.0	Email team regarding scheduling biweekly calls; determine deadline for defendant's discovery
Dia Rasinariu	8/25/2021	0.1	responses.
Dia Rasinariu	8/27/2021	0.7	Review and revise draft notice of 30(b)(6) deposition.
Dia Rasinariu	8/30/2021	0.7	Schedule weekly discovery call.
Dia Rasinariu	9/1/2021	0.7	Revise notice of 30(b0(6) deposition.
Dia Rasmaria	7/1/2021	0.7	Bi-weekly team call; circulate notes and action items from team call; review discovery served
			Fifth Third; email plaintiff A McKinney regarding Fifth Third's discovery requests; revise and
Dia Rasinariu	9/3/2021	2.4	serve notice of 30(b)(6) deposition.
Dia Rasmana	7/3/2021	2.1	Meet and confer with opposing counsel; team call with H Zavareei, A Haac, S Scott and J
Dia Rasinariu	9/8/2021	1.1	Whittemore regarding meet and confer and strategy for further discovery.
Dia rasinaria	37 G/2021	1.1	Draft plaintiffs' responses to Fifth Third's Second Set of Interrogatories and Requests for the
Dia Rasinariu	9/10/2021	6.7	Production of Documents.
Dia Rasinariu	9/13/2021	3.1	Revise discovery responses; communicate with A Haac and H Zavareei regarding same.
Dia Rasinariu	9/14/2021	0.7	Email plaintiff A McKinney regarding interrogatory verification.
Dia Rasinariu	9/14/2021	0.6	Meet and confer regarding Fifth Third's discovery responses.
Dia Rasinariu	9/16/2021	0.8	Review and file emails from team; draft agenda for bi-weekly call.
Dia Rasiliana	7/10/2021	0.0	Review and file emails from team; diant agonal for of-weekly earn.  Review and file emails from team; bi-weekly team call regarding status of discovery; circulate
Dia Rasinariu	9/17/2021	2.2	notes from bi-weekly team meeting.
Dia Rasinariu	9/20/2021	0.4	Draft stipulation of voluntary dismissal.
Dia Rasinariu	10/1/2021	0.5	Prepare agenda for bi-weekly call.
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Timekeeper Dia Pasinania	Date	Time	Description  Attend by weekly cell recording status of case and discovery
Dia Rasinariu	10/4/2021	1.5	Attend bi-weekly call regarding status of case and discovery.
Dia Rasinariu	10/8/2021	0.5	Meet and confer with opposing counsel regarding 30(b)(6) deposition topics.
Dia Rasinariu	10/8/2021	0.5	Team call regarding status of discovery.
Dia Rasinariu	10/8/2021	0.2	Communicate with H Zavareei in preparation for meet and confer.
Dia Rasinariu	10/11/2021	3.4	Draft discovery deficiency letter to Fifth Third.
Dia Rasinariu	10/12/2021	0.2	Meet and confer regarding 30(b)(6) deposition topics.
Dia Rasinariu	10/12/2021	1.0	Revise discovery deficiency letter to incorporate edits from A Haac.
Dia Rasinariu	10/13/2021	0.5	Finalize discovery deficiency letter; emails regarding discovery review platform.
Dia Rasinariu	10/15/2021	1.0	Attend bi-weekly team call regarding status of case and discovery; circulate agenda and notes from same.
Dia Kasinariu	10/13/2021	1.0	Review and revise opposition to Fifth Third's motion to bifurcate discovery; coordinate filing of
Dia Basimania	10/21/2021	1.2	1
Dia Rasinariu Dia Rasinariu	10/21/2021	1.3	Prepare agenda for bi-weekly team call; bi-weekly team call.
Dia Rasinariu  Dia Rasinariu	10/29/2021		Update notice of 30(b)(6) deposition.
	10/31/2021	0.3	Prepare for meet and confer with Fifth Third.
Dia Rasinariu	11/1/2021	0.9	Meet and confer with opposing counsel.
Dia Rasinariu	11/1/2021		Meet and confer follow-up' revise notice of 30(b)(6) deposition
Dia Rasinariu	11/1/2021	1.6	Communicate with co-counsel regarding exhibits for 30(b)(6) deposition.
Dia Rasinariu	11/2/2021	0.2	
Dia Rasinariu	11/4/2021	1.7	Review documents in preparation for 30(b)(6) deposition.  Attend 30(b)(6) deposition of Fifth Third.
Dia Rasinariu	11/5/2021	4.0	Attend 30(b)(6) deposition of Fifth Third.  Prepare agenda for call; team bi-weekly call regarding status of case and discovery; draft follows:
Die Designation	11/12/2021	2.6	
Dia Rasinariu	11/12/2021	2.6	up email regarding outstanding discovery disputes.
Dia Rasinariu	11/17/2021	0.3	Communicate with team regarding document review platform.
Dia Rasinariu	11/23/2021	0.2	Email team regarding bi-weekly call.  Schedule bi-weekly call.
Dia Rasinariu	11/26/2021	0.1	
Dia Rasinariu	11/29/2021	1.1	Bi-weekly call regarding status of discovery and case strategy.
Die Desimeniu	11/20/2021	2.2	Daview discovery communications, menous example for his weekly cells circulate next cell note
Dia Rasinariu	11/29/2021	2.3	Review discovery communications; prepare agenda for bi-weekly call; circulate post-call note: Communicate with A Haac and D Lawler regarding review of Fifth Third's production of
Dia Basimania	12/2/2021	0.2	documents.
Dia Rasinariu	12/3/2021	0.2	Review and file emails from team.
Dia Rasinariu	12/7/2021	0.3	Team call regarding discovery deadline, status of plaintiffs' discovery, and motion for summar
Dia Basimania	12/14/2021	0.7	
Dia Rasinariu	12/14/2021	0.7	judgment; review proposed decision tree for discovery review coding.  Review production and A Reynolds and A Haac regarding uploading production to discovery
Dia Rasinariu	12/15/2021	0.3	platform.
	12/15/2021		Team call regarding status of discovery and summary judgment strategy.
Dia Rasinariu Dia Rasinariu	12/17/2021 12/22/2021	1.0	Team call regarding DISCO discovery platform.
Dia Rasinariu  Dia Rasinariu		1.6	Prepare for biweekly team call; attend bi-weekly team call and circulate notes from same.
Dia Kasinariu	1/7/2022	1.0	· · · · · · · · · · · · · · · · · · ·
Dia Basimania	1/0/2022	1.2	Review and file emails from team; review letter from D. Marinucci regarding claw back productions.
Dia Rasinariu	1/9/2022	1.3	11
Dia Rasinariu	1/13/2022	1.0	Review and analyze draft expert report of M Simkovic.
Dia Rasinariu	1/14/2022	0.8	Team call regarding status of expert report.  Review and file emails from team.
Dia Rasinariu	1/20/2022		Team call regarding expert report.
Dia Rasinariu	1/21/2022	1.2	Look into finding expert from
Dia Rasinariu	1/24/2022	0.1	Email H Zavareei regarding expert search.
Dia Rasinariu	1/27/2022	0.1 2.1	Review Simkovic expert report and related correspondence.
Dia Rasinariu	2/8/2022		
Dia Rasinariu	2/10/2022	0.3	Review and file correspondence from team.
Dia Pasinaria	2/19/2022	1.2	Prepare for team meeting; team meeting with H Zavareei, A Haac, S Scott, and J Whitmore regarding case strategy.
Dia Rasinariu Dia Rasinariu	2/18/2022 2/21/2022	0.7	Internal call regarding discovery; meet and confer regarding same.
Dia Rasinariu  Dia Rasinariu		1.0	Attend status conference.
Dia Rasinariu  Dia Rasinariu	2/22/2022 2/23/2022	0.3	Meet and confer regarding depositions.
Dia Kasinariu	2/23/2022	0.3	
Dia Basimania	2/4/2022	0.6	Attend bi-weekly team call; coordinate with A Reynolds to draft subpoena for the deposition of Bruce Howard.
Dia Rasinariu	3/4/2022	0.6	
Dia Rasinariu	3/9/2022	0.1	Communicate with A Reynolds regarding service of subpoena to Bruce Howard.
Dis Desired	2/17/2022	1.0	Attend bi-weekly team call regarding status of case; circulate notes regarding same; research
Dia Rasinariu	3/17/2022	1.6	contact information for Bruce Howard.
Dia Rasinariu	3/21/2022	0.3	Research Bruce Howard's contact information.
	3/22/2022	1.2	Research Bruce Howard's contact information; attempt to reach Bruce Howard to schedule deposition.
Dia Rasinariu			

Timekeeper	Date	Time	Description
Dia Rasinariu	3/23/2022	6.5	Revise motion for summary judgment; research local rules regarding sealing.
			Research contact information for Bruce Howard; revise summary judgment motion to meet 20-
Dia Rasinariu	3/29/2022	6.0	page limit.
Dia Rasinariu	3/30/2022	0.8	Communicate with Bruce Howard regarding deposition subpoena.
			Prepare agenda for team call; team call regarding depositions and other case strategy;
Dia Rasinariu	4/1/2022	1.3	communicate with opposing counsel regarding deposition scheduling.
			Communicate with opposing counsel and Bruce Howard's counsel regarding deposition
Dia Rasinariu	4/4/2022	0.5	scheduling.
Dia Rasinariu	4/6/2022	0.7	Revise motion for summary judgment.
Dia Rasinariu	4/7/2022	0.2	Communicate with H Zavareei regarding deposition of Bruce Howard.
			Communicate with A Reynolds regarding deposition notices; communicate with counsel for
Dia Rasinariu	4/8/2022	0.8	Bruce Howard regarding deposition scheduling; review motion for pro hac vice admission.
Dia Rasinariu	4/13/2022	1.9	Revise motion for summary judgment.
Dia Rasinariu	4/14/2022	2.5	Prepare exhibits for motion for summary judgment; draft motion to seal.
			Emails regarding scheduling for deposition of Bruce Howard; email opposing counsel regarding
Dia Rasinariu	4/15/2022	0.4	sealed exhibits.
Dia Rasinariu	4/19/2022	0.1	Email opposing counsel regarding sealed exhibits to motion for summary judgment.
Dia Rasinariu	4/20/2022	0.5	Emails regarding deposition scheduling.
Dia Rasinariu	4/21/2022	8.3	Prepare for deposition of T Kappes.
Dia Rasinariu	4/22/2022	5.3	Take deposition of T Kappes.
Dia Rasinariu	4/25/2022	0.1	Follow up regarding court's qc notice.
			Communicate with clerk of court regarding qc notice; correct OCR on exhibits and re-file mot
Dia Rasinariu	4/26/2022	1.1	for summary judgment.
Dia Rasinariu	4/27/2022	0.1	Serve amended notice of deposition of Bruce Howard.
Dia Rasinariu	4/28/2022	0.1	Communicate with A Reynolds regarding document clawback.
Dia Rasinaria	1/20/2022	0.1	Prepare agenda for biweekly team call; team call regarding status of case and next steps;
Dia Rasinariu	4/29/2022	1.5	circulate call notes regarding same.
Dia Rasinariu	5/3/2022	0.8	Team call regarding depositions and other upcoming deadlines.
Dia Rasiliaria	3/3/2022	0.0	Emails regarding logistics for Bruce Howard deposition; compile list of hot documents for Bru
Dia Rasinariu	5/4/2022	1.1	Howard deposition.
Dia Kasiliai iu	3/4/2022	1.1	Communicate with Veritext regarding logistics for B Howard deposition; email team regarding
Dia Rasinariu	5/5/2022	0.3	same.
Dia Kasiliai iu	3/3/2022	0.5	Same.
Dia Rasinariu	5/9/2022	0.8	Coordinate with Veritext regarding using multimedia tools for the deposition of Bruce Howard
Dia Rasinariu	5/11/2022	6.7	Prepare for deposition of Bruce Howard.
Dia Kasiliai iu	3/11/2022	0.7	Communicate with H Zavareei regarding deposition of Bruce Howard; update deposition outli
Dia Basimasia	5/12/2022	2 2	and finalize exhibits.
Dia Rasinariu	5/12/2022	3.3	
Dia Rasinariu	5/13/2022	7.7	Attend deposition of B Howard; call with team regarding same.
Dia Rasinariu	5/17/2022	0.1	Review emails from team regarding expert reports.
Dia Rasinariu	6/14/2022	0.3	Calls internally and with co-counsel regarding mediation statement.
Dia Rasinariu	6/19/2022	0.1	Review Simkovic expert report.
Dia Rasinariu	6/21/2022	0.2	Review and file emails from team.
Dia Rasinariu	7/5/2022	0.8	Attend team call regarding expert depositions.
Dia Rasinariu	7/11/2022	0.7	Review expert deposition schedule.
			Communicate with H Zavareei regarding expert depositions; email team regarding expert
Dia Rasinariu	7/12/2022	0.2	deposition scheduling.
			Emails regarding expert deposition scheduling; review notice of deposition; review excel
Dia Rasinariu	7/13/2022	1.1	spreadsheet of common costs.
Dia Rasinariu	7/14/2022	0.1	Draft email to co-counsel regarding common expenses paid by TZ.
Dia Rasinariu	7/15/2022	0.1	Send Fifth Third's rebuttal reports to A Reynolds.
			Communicate with co-counsel regarding expert deposition of Charles Grice; communicate wit
Dia Rasinariu	7/19/2022	0.2	Veritext regarding the logistics of deposition of Charles Grice.
Dia Rasinariu	7/25/2022	0.1	Communicate with H Zavareei regarding expert deposition of Grice.
Dia Rasinariu	7/27/2022	2.0	Prepare for expert deposition of Charles Grice.
			Prepare for expert deposition of Charles Grice; communicate with A Haac and H Zavareei
Dia Rasinariu	7/28/2022	9.5	regarding same.
Dia Rasinariu	7/29/2022	7.0	Take expert deposition of Charles Grice.
Dia Rasinariu	8/1/2022	0.2	Draft email to A Haac regarding Grice deposition.
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Timekeeper	Date	Time	Description
Dia Rasinariu	8/12/2022	0.9	Call with H Zavareei and A Haac regarding motion for summary judgment and Daubert motions.
Dia Rasinariu  Dia Rasinariu	8/25/2022	0.9	Team call regarding summary judgment strategy.
Dia Rasinariu  Dia Rasinariu	8/31/2022	0.4	Follow up regarding expert deposition transcripts.
Dia Rasinariu	9/8/2022	0.2	Review and file emails from team.
Dia Rasinariu	9/8/2022	0.2	Communicate with H Zavareei regarding status of case.
Dia Rasinariu	9/9/2022	0.4	Email experts regarding errata to their deposition transcripts.
Dia Rasiliariu	91912022	0.4	Prepare for team call; call with co-counsel regarding motion for summary judgment strategy and
Dia Rasinariu	9/16/2022	1.3	other case management; circulate notes regarding same.
Dia Rasinariu	9/19/2022	0.4	Call with A Haac regarding summary judgment strategy.
Dia Kasilianu	9/19/2022	0.4	Can with A made regarding summary judgment strategy.
Dia Rasinariu	9/28/2022	2.2	Communicate with A Haac regarding opposition to motion for summary judgment; review same.
Dia Rasinariu	9/29/2022	1.5	Team call regarding opposition to motion for summary judgment.
Dia Kasilianu	9/29/2022	1.3	Revise opposition to motion for summary judgment; communicate with A Haac regarding same;
Dia Basinariu	10/2/2022	67	coordinate filing of same.
Dia Rasinariu	10/3/2022	6.7	Team call regarding reply in support of summary judgment; circulate notes regarding same.
Dia Rasinariu Dia Rasinariu	10/7/2022	0.8	
Dia Kasinariu	10/21/2022	0.8	Team call regarding summary judgment briefing.
D: D : .	11/2/2022	1.0	Communicate with A Haac and H Zavareei regarding TILA argument; revise TILA section of
Dia Rasinariu	11/2/2022	1.8	reply brief.
Dia Rasinariu	11/15/2022	0.1	Review demand letter.
Dia Rasinariu	12/9/2022	0.5	Call with A Haac regarding status of case and upcoming deadlines.
Dia Rasinariu	12/19/2022	0.2	Review and file emails from team.
Dia Rasinariu	12/20/2022	0.8	Team call regarding upcoming deadlines and status of case.
Dia Rasinariu	12/21/2022	0.2	Draft proposed agenda for team call.
			Team call with co-counsel regarding status of case, trial logistics, and upcoming deadlines;
Dia Rasinariu	12/22/2022	1.7	revise demand letter.
Dia Rasinariu	12/23/2022	3.0	Revise and serve demand letter.
Dia Rasinariu	1/5/2023	1.0	Call with team to discuss Daubert motions and trial preparation.
Dia Rasinariu	1/11/2023	0.2	Review and file emails from team.
Dia Rasinariu	1/12/2023	1.1	Call with K Hulick regarding preparing proof chart and related work.
Dia Rasinariu	1/13/2023	1.3	Team call regarding settlement demand and trial preparation.
Dia Rasinariu	1/19/2023	0.6	Team call regarding status conference; review emails regarding same.
Dia Rasinariu	2/3/2023	1.5	Team call regarding trial prep strategy.
Dia Rasinariu	2/8/2023	0.2	Revise notice of withdrawal of appearance.
Dia Rasinariu	2/10/2023	1.3	Review Grice deposition transcript.
Emma Bass	7/20/2022	1.0	Put together binder for July 21, 2022 deposition.
Emma Bass	9/25/2023	0.6	Correspondence with D. Gillis, E. Schilp, and L. Zhu regarding 9/25 filing.
			Printing and assembling a courtesy copy of Plaintiff's motion for Partial Summary Judgement to
Emma Schilp	4/25/2022	0.5	be sent to the Southern District of Ohio.
Emma Schilp	10/4/2022	0.3	Preparing courtesy copy for Paralegal A. McReynolds; walking to FedEx
Genna Wolinsky	7/3/2023	0.3	Saving and circulating filing (dkt. 292).
Genna Wolinsky	7/17/2023	1.7	Finalizing draft of reply ISO Motion for Attorneys' Fees, filing, saving, and circulating.
Genna Wolinsky	8/8/2023	0.2	Adding myself to CS Disco account so I can send invoice to Patricia Frietchen.
Genna Wolinsky	8/14/2023	0.4	Figuring out CS Disco billing issue.
Genna Wolinsky	8/22/2023	0.2	Pulling docket.
Genna Wolinsky	9/19/2023	0.1	Sending September CS Disco invoice to Pat Frietchen.
Genna Wolinsky	9/20/2023	0.0	Running updated time and expenses for A. Haac and compiling firm resume.
Genna Wolinsky	9/21/2023	0.1	Saving documents for Fifth Third declaration.
			Working on finalizing materials for filing today; corresponding with team; Zoom meeting with
			H. Zavareei and A. Haac; putting together plan for filing to send to team; running expense
Genna Wolinsky	9/22/2023	3.5	reports.
Genna Wolinsky	9/26/2023	2.0	Working on finalizing Hassan's declaration ISO Motion for Attorneys' Fees.
Genna Wolinsky	10/6/2023	0.1	Saving and circulating filings.
Genna Wolinsky	10/10/2023	0.1	Checking local rules; calendaring dates.
Genna Wolinsky	10/10/2023	0.2	Creating template for opposition to motion to strike.
Genna Wolinsky	10/12/2023	1.9	Editing Motion to Strike;
		0.1	Saving and circulating filing.
Genna Wolinsky	11/14/2023	0.1	Saving and circulating filings; calendaring dates.
Genna Wolinsky	11/30/2023		Saving and circulating filings; calendaring dates.
Genna Wolinsky	12/1/2023	0.1	
Genna Wolinsky	12/7/2023	0.3	Reviewing documents to include in binder for status conference for H. Zavareei.

Timekeeper	Date	Time	Description
Genna Wolinsky	12/11/2023	0.9	Printing out time records and declarations for H. Zavareei.
Genna Wolinsky	12/11/2023	0.1	Saving and circulating filing; calendaring dates.
Genna Wolinsky	12/12/2023	0.1	Pulling materials for A. Haac.
Genna Wolinsky	12/13/2023	0.8	Looking into on Westlaw.
Genna Wolinsky	12/14/2023	0.6	Corresponding with team re: updated time and expenses.
Genna Wolinsky	12/15/2023	0.7	Locating for upcoming fee petition.
			Corresponding with team re: upcoming fee petition;
Genna Wolinsky	12/18/2023	1.1	time and expense record data.
Genna Wolinsky	12/19/2023	1.9	Case call with C. Carlson; calculating time and expense
			Working on finalizing time and expense reports; preparing for Friday's filing of renewed Motion
Genna Wolinsky	12/20/2023	1.5	for Attorneys' Fees.
Genna Wolinsky	12/21/2023	2.9	Working on finalizing materials for renewed fee petition.
			Internal call preparing for 26(f) call with opposing counsel; 26(f) call with opposing counsel;
Hassan Zavareei	10/2/2012	1.8	preparing 26(f) report.
Hassan Zavareei	10/22/2012	0.1	Discuss case updates and to-do list at team meeting.
Hassan Zavareei	12/13/2012	7.9	Drafting and revising opposition to motion to dismiss.
Hassan Zavareei	1/16/2013	1.9	Reviewing 5/3's reply memorandum; research regarding issues raised in same.
Hassan Zavareei	1/17/2013	0.1	Discuss case updates and to-do list at case meeting.
Hassan Zavareei	1/17/2013	1.6	Reviewing 5/3's reply; research re same; conference with Kaliel re same.
Hassan Zavareei	1/22/2013	1.9	Preparing for status conference; related correspondence.
Hassan Zavareei	1/29/2013	1.9	Editing draft reply brief.
Hassan Zavareei	1/30/2013	2.8	Editing, revising, and finalizing surreply.
Hassan Zavareei	1/30/2013	1.7	Editing and revising surreply.
Hassan Zavareei	2/7/2013	0.4	Coordinating with co-counsel regarding settlement conference.
Hassan Zavareei	2/19/2013	0.9	Preparing for settlement conference.
			T/C with Barnow re settlement structure; research re 5/3 payday loan damages; drafting, editing
Hassan Zavareei	2/20/2013	1.6	and revising settlement structure letter.
Hassan Zavareei	2/21/2013	1.8	Editing and revising settlement structure outline; t/c with Barnow regarding settlement.
Hassan Zavareei	2/22/2013	1.2	Preparing for settlement conference.
Hassan Zavareei	2/27/2013	1.4	T/C with Barnow regarding Florida case; research regarding lawyers in Furniture lease case.
Hassan Zavareei	3/1/2013	2.6	T/C with Barnow; t/c with new co-counsel; t/c with defense counsel.
Hassan Zavareei	3/7/2013	1.5	Drafting letter to plaintiffs' counsel; emails with Barnow re same.
Hassan Zavareei	3/13/2013	1.3	Reviewing settlement letter; t/c with Barnow re same.
Hassan Zavareei	3/13/2013	0.8	T/C with Ben re settlement.
			T/C with Barnow re settlement issues; research regarding transfer of other case
Hassan Zavareei	3/19/2013	2.9	
Hassan Zavareei	3/19/2013	1.8	T/C with Barnow re settlement; t/c with opposing counsel re same.
Hassan Zavareei	3/20/2013	0.1	Discuss case updates and to-do list at team case meeting.
Hassan Zavareei	4/1/2013	2.6	Drafting letter to counsel in Florida case; emails with co-counsel re same.
Hassan Zavareei	4/2/2013	0.3	Emails with co-counsel and reviewing motion for transfer or stay by 5/3.
Hassan Zavareei	4/3/2013	0.6	Preparation for hearing/status conference.
			Preparation for telephonic status conference; attending status conference; t/c with counsel in
Hassan Zavareei	4/4/2013	1.7	Florida case.
Hassan Zavareei	4/8/2013	2.1	Drafting letter to Lasarkis counsel; preparing motion to be appointed lead counsel.
Hassan Zavareei	4/18/2013	1.9	Editing and finalizing motion to be appointed interim class counsel.
Hassan Zavareei	4/26/2013	0.9	Reviewing Lasarkis group opposition to MTD.
Hassan Zavareei	4/26/2013	1.8	Reviewing 23(g) motion; t/c with opposing counsel re same.
			Editing and revising interim class counsel motion; editing and revising motion for leave to
Hassan Zavareei	4/30/2013	2.9	amend.
Hassan Zavareei	5/20/2013	0.9	Research on new cases filed.
	5/21/2013	1.7	Reviewing decision from Judge King; t/c with co-counsel re same.
Hassan Zavareei		0.7	T/C with opposing counsel re status conference.
Hassan Zavareei Hassan Zavareei	5/22/2013	0.7	
	5/22/2013 5/24/2013	1.8	Preparing for telephonic hearing; attending hearing; t/c with Barnow re same.
Hassan Zavareei	5/24/2013		
Hassan Zavareei Hassan Zavareei		1.8	Editing and revising brief on leadership.
Hassan Zavareei Hassan Zavareei Hassan Zavareei	5/24/2013 7/8/2013	1.8 3.6	Editing and revising brief on leadership.  Travel to Cincinnati; attending meeting with Judge Barrett and co-counsel; travel back to DC;
Hassan Zavareei Hassan Zavareei Hassan Zavareei Hassan Zavareei	5/24/2013 7/8/2013 7/12/2013	1.8 3.6 12.7	Editing and revising brief on leadership.  Travel to Cincinnati; attending meeting with Judge Barrett and co-counsel; travel back to DC; conference with Scott and Barnow.
Hassan Zavareei Hassan Zavareei Hassan Zavareei Hassan Zavareei Hassan Zavareei	5/24/2013 7/8/2013 7/12/2013 7/15/2013	1.8 3.6 12.7 0.8	Editing and revising brief on leadership.  Travel to Cincinnati; attending meeting with Judge Barrett and co-counsel; travel back to DC; conference with Scott and Barnow.  Editing and reviewing proposed order.
Hassan Zavareei Hassan Zavareei Hassan Zavareei Hassan Zavareei	5/24/2013 7/8/2013 7/12/2013	1.8 3.6 12.7	Editing and revising brief on leadership.  Travel to Cincinnati; attending meeting with Judge Barrett and co-counsel; travel back to DC; conference with Scott and Barnow.

Timekeeper	Date	Time	Description
Hassan Zavareei	7/18/2013	0.9	Reviewing and editing the proposed time and expense reporting form.
Hassan Zavareei	7/19/2013	0.2	Editing and revising memorandum regarding compensable time.
Hassan Zavareei	7/22/2013	0.4	Reviewing and approving final billing protocol.
Hassan Zavareei	7/23/2013	0.2	Correspondence with co-leads regarding trust account.
Hassan Zavareei	7/24/2013	0.1	Emails with Whittemore about expense contributions.
Hassan Zavareei	8/3/2013	0.1	Email with Stuart Scott regarding call with Fanter.
Hassan Zavareei	8/7/2013	1.2	Reviewing memo on IL law.
			T/C with co-leads regarding consolidation and amended complaint; preparing client
Hassan Zavareei	8/19/2013	2.1	questionnaire.
			Research on communications with former employees; reviewing memo from Barnow re same; t/
Hassan Zavareei	8/23/2013	1.7	with Jasper Ward regarding same.
Hassan Zavareei	8/28/2013	1.6	Editing and revising motion to consolidate.
Hassan Zavareei	9/10/2013	1.7	Preparing for status conference; research on payday loan legal issues.
			Reviewing research memos; conference with Kaliel regarding CAC; t/c with Whittemore
Hassan Zavareei	9/11/2013	2.9	regarding status conference; attending status conference.
Hassan Zavareei	9/23/2013	1.8	Research for CAC; t/c with lead counsel re same.
Hassan Zavareei	9/24/2013	1.3	Reviewing Frecht memo re CAC; t/c with lead counsel re same.
Hassan Zavareei	10/15/2013	3.2	Editing and finalizing complaint for filing; conference with Kaliel re same.
Hassan Zavareei	10/16/2013	0.5	Editing and revising consent motion.
Hassan Zavareei	1/13/2014	1.9	Editing and revising drafts to opposition to motion to dismiss.
Hassan Zavareei	1/14/2014	1.3	Working on consolidating and revising motion to dismiss opposition.
Hassan Zavareei	1/16/2014	3.7	Editing and revising opposition to motion to dismiss.
Hassan Zavareei	1/20/2014	6.2	Editing and revising opposition to motion to dismiss.
Hassan Zavareei	1/21/2014	4.9	Editing and revising opposition to motion to dismiss.
Hassan Zavareei	3/14/2014	0.3	Reviewing time submissions by co-counsel.
Hassan Zavareei	6/13/2014	1.5	Reviewing information with Kaliel; setting up call with co-counsel.
Hassan Zavareei	8/11/2014	1.7	Reviewing BOK decision; correspondence with Stuart and Jason regarding same.
Hassan Zavareei	8/12/2014	1.7	Editing and revising notice of supplemental authority.
			T/C with co-counsel regarding settlement issues and upcoming call with the Court; reviewing
Hassan Zavareei	4/29/2015	1.3	motion for reconsideration.
Hassan Zavareei	4/30/2015	1.9	Preparing for and attending (telephonically) status conference).
Hassan Zavareei	7/28/2015	0.7	T/C with Burke re settlement.
Hassan Zavareei	8/12/2015	0.9	T/C with co-counsel re settlement; email and call to Burke re same.
Hassan Zavareei	8/15/2015	0.8	Emails with Jim Burke re settlement; call with Burke re same.
Hassan Zavareei	9/17/2015	1.7	Reviewing and revising draft settlement agreeement.
Hassan Zavareei	11/4/2015	1.2	T/C with Barnow and Scott regarding settlement.
Hassan Zavareei	12/8/2015	3.4	Editing and revising mediation statement.
Hassan Zavareei	2/17/2016	0.6	T/C with co-lead counsel regarding settlement call with Judge Barrett.
Hassan Zavareei	2/18/2016	0.8	T/C with Judge Barrett regarding settlement; emails with co-counsel regarding same.
			Preparation for call with Judge Barrett; call with Judge Barrett; emails with co-counsel regardin
Hassan Zavareei	6/14/2016	1.4	same.
Hassan Zavareei	7/7/2016	0.9	T/C with Judge Barrett regarding settlement; emails with co-counsel re same.
Hassan Zavareei	9/23/2016	1.4	Reviewing term sheet proposed by 5/3.
			Call with Jason and Stu; call with court and defense counsel; call with defense counsel; meeting
			with Kaliel; reviewing previous agreement with 5/3 and with BOK for provisions regarding
Hassan Zavareei	9/26/2016	2.3	allocation.
			Call with Burke; emails with Burke; negotiating release language; emails with Stu and Jason re
Hassan Zavareei	9/27/2016	1.3	same.
Hassan Zavareei	10/12/2016	4.2	Preparing draft settlement agreement; call with co-lead counsel regarding same.
Hassan Zavareei	10/31/2016	3.9	Editing and revising draft settlement agreement.
Hassan Zavareei	11/1/2016	1.2	Reviewing bills from co-counsel.
			Preparation for call with defense counsel; call with co-counsel; research for preparation of
Hassan Zavareei	1/4/2017	1.9	counter-proposal.
Hassan Zavareei	1/9/2017	0.4	Emails with co-counsel regarding settlement issues.
			Call with co-counsel re settlement; call with defense counsel re settlement; drafting email to
Hassan Zavareei	1/12/2017	1.1	Judge Barrett.
Hassan Zavareei	1/13/2017	2.6	Drafting letter to defense counsel; emails with co-counsel re damages issues.
Hassan Zavareei	1/27/2017	0.6	T/C with Judge Barrett re settlement issues.
			Emails with co-counsel re letter to defense counsel re damages; conference with Kaliel re same;
Hassan Zavareei	1/30/2017	2.1	editing and revising same.
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Timekeeper	Date	Time	Description
Hassan Zavareei	1/31/2017	1.3	Editing and revising letter to defense counsel.
			Reviewing correspondence from defense counsel; emails with co-counsel re same; drafting
Hassan Zavareei	2/10/2017	2.7	response.
Hassan Zavareei	2/28/2017	0.5	Correspondence with co-leads re Wall letter.
Hassan Zavareei	3/1/2017	2.1	Drafting response to Brett Wall letter.
Hassan Zavareei	3/30/2017	5.4	Drafting, editing, and revising settlement letters to Court and opposing counsel.
Hassan Zavareei	5/8/2017	0.7	Emails with co-lead counsel regarding case status; call with Court (Grace Royalty) re same.
Hassan Zavareei	6/7/2017	2.9	Preparing for call with Court; call with Court; emails to co-counsel re same.
			Preparation for call with Judge Barrett re settlement; call with Judge Barrett re settlement; email
Hassan Zavareei	8/8/2017	1.8	with co-counsel re same.
Hassan Zavareei	8/9/2017	0.3	Call with Stu Scott re case strategy.
Hassan Zavareei	8/10/2017	0.3	Conference with Kaliel regarding case strategy.
Hassan Zavareei	8/28/2017	0.1	Call with Scott re settlement.
			Preparing for call with Judge Barrett; call with Judge Barrett; email to team re call with Judge
Hassan Zavareei	9/5/2017	2.6	Barrett.
			Call with Stu Scott; emails with Ben Barnow; preparing for call with Court; conference with
Hassan Zavareei	9/20/2017	2.9	Kaliel; participating in status conference.
Hassan Zavareei	11/1/2017	0.1	Email with Royalty re settlement conference.
Hassan Zavareei	3/11/2019	0.3	Emails with co-counsel.
Hassan Zavareei	7/23/2019	1.2	Preparation for call with opposing counsel. Call with opposing counsel.
Hassan Zavareei	7/24/2019	0.9	Editing letter to opposing counsel.
Hassan Zavareei	11/6/2019	2.6	Meeting and conferring with defense counsel re discovery; working with expert Art Olsen.
			Research on issues relating to dismissal of Klopfenstein and Adanich; editing letter to defense
Hassan Zavareei	11/8/2019	1.3	counsel on same issue.
Hassan Zavareei	11/13/2019	0.8	Editing letter to defense counsel regarding dismissal of Klopfenstein and Adanich.
Hassan Zavareei	11/15/2019	2.1	Research for discovery issue.
Hassan Zavareei	11/22/2019	0.2	Analyzing notice of withdrawal by Burke, and communication with S. Scott regarding same.
Hassan Zavareei	11/26/2019	0.1	Email with Stu Scott regarding deposition schedule.
Hassan Zavareei	11/26/2019	2.8	Negotiating deposition dates; planning depositions; strategizing regarding deposition defense.
Hassan Zavareei	11/27/2019	0.1	Email with S. Scott regarding outline for depositions.
Hassan Zavareei	11/29/2019	0.6	Reviewing draft motion to amend agreed calendar and email from opposing counsel re same.
Hassan Zavareei	11/30/2019	0.1	Email with Stu Scott re scheduling.
			Reviewing proposed schedule change; email with co-counsel re discovery; email with opposing
Hassan Zavareei	12/2/2019	1.4	counsel re same.
Hassan Zavareei	12/4/2019	0.3	Emails with opposing counsel re deposition dates.
Hassan Zavareei	12/5/2019	0.2	Reviewing proposed order and emailing opposing counsel re same.
			Reviewing meet and confer correspondence; call with co-counsel regarding discovery; discussio
Hassan Zavareei	12/9/2019	1.3	with A Haac re same.
Hassan Zavareei	12/9/2019	0.2	Emails with opposing counsel re proposed scheduling order.
Hassan Zavareei	12/16/2019	1.3	Prepping client for deposition.
Hassan Zavareei	12/17/2019	0.5	Call with Stuart Scott re deposition preparation.
Hassan Zavareei	12/17/2019	0.5	Call with B. Barnow regarding deposition preparation issues.
Hassan Zavareei	12/18/2019	2.7	preparing witnesses for deposition; call with co-leads re same
Hassan Zavareei	12/19/2019	0.4	Call with A Haac re depositions.
Hassan Zavareei	12/19/2019	0.8	emails and calls with co-counsel re Laskaris depositions.
Hassan Zavareei	12/30/2019	4.3	Editing 30b6 notice; scheduling depo; call with co-leads; preparing for depositions.
Hassan Zavareei	1/13/2020	3.1	Preparing depo prep outline.
Hassan Zavareei	1/13/2020	0.9	Meeting with Haac on deposition issues; emails with co-counsel coordinating same.
			Reviewing documents and preparing depo prep materials; travel to Chicago for meeting with J.
Hassan Zavareei	1/14/2020	5.9	Fyock.
Hassan Zavareei	1/15/2020	10.9	Preparing Fyock for deposition; travel to DC.
			Preparing for McKinney deposition preparation; reviewing meet and confer correspondence;
Hassan Zavareei	1/16/2020	2.7	conference with Haac re same.
Hassan Zavareei	1/17/2020	5.9	Preparing for meeting with McKinney; travel to Savannah for prep meeting.
Hassan Zavareei	1/19/2020	13.4	preparing Adam McKinney for his deposition.
Hassan Zavareei	1/20/2020	4.2	Travel home from McKinney depo prep sessions.
			Reviewing and editing meet and confer letter; call with co-counsel; call with client; emails with
Hassan Zavareei	1/21/2020	3.1	co-counsel regarding depositions.
		2.0	Preparing for McKinney deposition.
Hassan Zavareei	2/21/2020	2.8	r repaining for McKinney deposition.

Timekeeper	Date	<b>!</b>	Description
Hassan Zavareei	2/23/2020	6.4	Preparing for McKinney deposition; call with McKinney; travel to Savannah for deposition.
Hassan Zavareei	2/24/2020	9.8	Prepping McKinney for deposition; defending deposition; travel to DC.
Hassan Zavareei	3/5/2020	3.9	Editing mediation statement.
Hassan Zavareei	3/13/2020	7.5	Preparing for 30(b)(6) deposition.
Hassan Zavareei	3/16/2020	3.2	Preparing for 30(b)(6) deposition.
Hassan Zavareei	3/17/2020	1.7	Analyzing damages data; call with expert A. Olsen re same.
Hassan Zavareei	3/22/2020	2.3	editing demand letter
Hassan Zavareei	3/26/2020	2.2	Team call; editing letter to opposing counsel.
Hassan Zavareei	4/16/2020	3.8	Drafting and editing class certification motion.
Hassan Zavareei	4/17/2020	6.3	Drafting class certification motion; working with expert on same.
Hassan Zavareei	4/18/2020	4.3	Drafting class certification motion.
Hassan Zavareei	4/19/2020	3.7	Drafting class cert motion.
Hassan Zavareei	4/20/2020	8.4	Drafting and editing class certification motion.
Hassan Zavareei	5/18/2020	1.8	Reviewing and editing summary judgment motion.
Hassan Zavareei	5/18/2020	0.8	T/C with co-leads regarding strategy.
Hassan Zavareei	6/1/2020	1.3	T/c with opposing counsel; call with co-counsel regarding discovery issues and mediation.
Hassan Zavareei	6/2/2020	1.3	T/C with Art Olsen re loan data analysis; t/c with co-counsel; emails with co-counsel.
Trassari Zavareer	0/2/2020	1.5	T/C with co-counsel regarding class certification, settlement and discovery; t/c with Court and
Hassan Zavareei	6/3/2020	2.3	opposing counsel regarding same issues.
Hassan Zavareei	6/30/2020	0.3	Emails regarding data from Defendants and Olsen analysis.
Hassan Zavareei	7/5/2020	0.3	Emails with co-leads regarding discovery issues.
nassan Zavareer	1/3/2020	0.2	T/C with Haac re Olsen calculations; reviewing and editing email to OC regarding same;
Haaaaa 7aaaaa:	7/6/2020	2.1	
Hassan Zavareei Hassan Zavareei	7/6/2020	2.1	preparing for mediation.
	7/6/2020	2.7	Damages calculations work with expert Art Olsen.
Hassan Zavareei	7/8/2020	0.5	Prep for mediation.
	- /2.1 /2.2.2.2		Editing mediation statement; research for class cert. reply brief; call with co-lead counsel
Hassan Zavareei	7/21/2020	8.3	regarding damages and mediation.
Hassan Zavareei	7/29/2020	0.2	Reviewing news coverage of case.
Hassan Zavareei	8/4/2020	3.1	Preparing for mediation; call with co-counsel re same,
Hassan Zavareei	8/11/2020	1.2	Preparation for court call; attending court call; follow up call with Stu Scott re same.
Hassan Zavareei	8/21/2020	4.8	Editing reply in support of class certification.
Hassan Zavareei	8/26/2020	6.9	Drafting, editing and revising class certification reply.
Hassan Zavareei	8/27/2020	5.3	Editing reply in support of class certification.
Hassan Zavareei	9/1/2020	6.2	Editing and revising class cert reply brief.
			Email correspondence with opposing counsel and co-counsel regarding 5/3's request for a sur
Hassan Zavareei	9/15/2020	0.9	reply.
Hassan Zavareei	9/23/2020	2.1	Call with Judge Barrett; preparation for call with Judge Barrett.
			Preparing for status conference; attending status conference; call with co-counsel regarding
Hassan Zavareei	9/24/2020	1.9	mediation strategy; reviewing motion for leave to file surreply.
Hassan Zavareei	9/27/2020	1.7	Editing and finalizing opposition to motion for leave to file sur-reply.
Hassan Zavareei	9/28/2020	2.9	Editing and finalizing opposition to motion for leave to file sur-reply.
Hassan Zavareei	3/29/2021	3.2	Reviewing discovery responses and preparing for SJ and additional discovery.
Hassan Zavareei	3/30/2021	1.7	Editing discovery requests; call with team.
Hassan Zavareei	4/1/2021	3.1	Working on notice plan.
Hassan Zavareei	4/7/2021	1.6	working on notice plan; call with Epiq staff re same
Hassan Zavareei	4/19/2021	1.8	Emails with co-counsel and opposing counsel regarding notice plan; preparing notice plan.
Hassan Zavareei	4/22/2021	3.1	Working on notice plan.
Hassan Zavareei	5/12/2021	2.8	Editing proposed notice plan.
Hassan Zavareei	5/24/2021	3.6	Working on discovery plan; reviewing discovery responses.
Hassan Zavareei Hassan Zavareei	5/24/2021	0.9	Editing notice plan and proposed scheduling order.
Hassan Zavareei			Editing notice plan and proposed scheduling order.  Editing notice plan and proposed scheduling order.
	5/25/2021	2.4	
Hassan Zavareei	5/26/2021	1.2	Editing notice plan and proposed scheduling order.
Hassan Zavareei	5/27/2021	4.1	Editing notice plan and proposed scheduling order.
Hassan Zavareei	5/28/2021	2.3	Editing notice plan and proposed scheduling order.
Hassan Zavareei	6/1/2021	0.8	Email to Smurzynski regarding notice plan and schedule.
Hassan Zavareei	6/7/2021	3.7	Editing and revising notice plan; email to co-counsel, then opposing counsel regarding same.
Hassan Zavareei	6/9/2021	2.8	Editing and revising notice documents and negotiating same with opposing counsel.
Hassan Zavareei	6/10/2021	3.1	Editing and revising notice documents and negotiating same with opposing counsel.
Hassan Zavareei	6/11/2021	3.1	Meeting and conferring on discovery plan and notice plan.

Timekeeper	Date	Time	Description
Hassan Zavareei	6/16/2021	2.6	Meeting and conferring on notice plan.
Hassan Zavareei	6/21/2021	4.2	Editing notice documents; meeting and conferring on same; editing CMS.
Hassan Zavareei	6/28/2021	2.1	Revising notice plan; meeting and conferring regarding same.
Hassan Zavareei	6/29/2021	3.6	Finalizing and filing motion for notice plan.
Hassan Zavareei	8/3/2021	3.8	Revising SJ motion.
Hassan Zavareei	8/3/2021	1.3	Call with leadership team regarding discovery and other strategy issues.
Hassan Zavareei	8/4/2021	4.8	Editing SJ brief.
Hassan Zavareei	8/12/2021	2.1	Coordinating notice; reviewing discovery requests; editing deficiency letter.
Hassan Zavareei	8/17/2021	1.3	Managing class notice.
Hassan Zavareei	9/3/2021	2.5	Reviewing discovery responses (.4); drafting meet and confer letter (1.4); team strategy call (.7)
Hassan Zavareei	9/8/2021	2.1	Discovery meet and confer; team call; research re discovery issues.
			preparing for settlement negotiations; call with Smurzynski re settlement; call with Haac re
Hassan Zavareei	9/16/2021	2.3	same.
Hassan Zavareei	9/17/2021	1.3	Discovery.
Hassan Zavareei	10/4/2021	2.1	T/C with team regarding discovery; revising discovery documents.
Hassan Zavareei	10/18/2021	1.9	Editing and revising opposition to motion for trial plan.
Hassan Zavareei	10/20/2021	3.2	Editing and revising opposition to motion for trial plan.
Hassan Zavareei	10/21/2021	9.8	Editing and revising opposition to motion for trial plan.
			Preparing for meet and confer; conducting meet and confer; writing email regarding discovery;
Hassan Zavareei	11/1/2021	3.1	calls and emails with co-counsel regarding same.
			Writing email regarding discovery; calls and emails with co-counsel regarding same; reviewing
Hassan Zavareei	11/2/2021	4.3	document production.
Hassan Zavareei	11/11/2021	3.7	Reviewing discovery responses and drafting responses.
Hassan Zavareei	11/12/2021	1.3	Discovery meet and confer; reviewing search terms; call with co-counsel.
Hassan Zavareei	12/14/2021	0.6	T/C with co-counsel regarding discovery.
Hassan Zavareei	12/22/2021	0.9	Document review training.
Hassan Zavareei	1/7/2022	1.1	Case strategy call.
Hassan Zavareei	1/11/2022	4.1	Working on expert reports and SJ motions; call with Haac regarding expert reports.
Hassan Zavareei	1/12/2022	5.3	Working on expert reports; call with Olsen.
Hassan Zavareei	1/14/2022	3.1	Revising expert report; calls and emails with co-counsel.
Hassan Zavareei	1/21/2022	3.8	Revising expert report; call with team regarding same.
Hassan Zavareei	2/8/2022	3.1	Editing and revising summary judgment motion.
Hassan Zavareei	2/8/2022	1.9	Editing and revising expert report.
			Reviewing privilege log letter; reviewing and revising SJ brief; reviewing and revising demand
Hassan Zavareei	3/17/2022	5.3	letter; team call regarding depositions, SJ, and document review.
Hassan Zavareei	4/22/2022	5.4	Assisting in preparation for Kappes deposition; second chairing deposition.
Hassan Zavareei	5/11/2022	7.9	Preparing for Howard deposition; reviewing expert report.
Hassan Zavareei	5/12/2022	14.8	Preparing for Bruce Howard deposition.
Hassan Zavareei	5/13/2022	14.8	Preparing for and taking Bruce Howard deposition; debrief after deposition.
Hassan Zavareei	5/17/2022	5.1	Preparing for hearing; attending hearing; expert reports.
Hassan Zavareei	5/18/2022	6.1	expert reports; calls with co-counsel regarding same.
Hassan Zavareei	5/19/2022	2.8	expert reports.
			Call with Court; call with S. Scott re SJ briefing; call with opposing counsel re SJ briefing
Hassan Zavareei	5/20/2022	3.9	schedule; expert reports.
Hassan Zavareei	5/25/2022	3.1	Reviewing defense expert reports; calls with co-counsel re same.
Hassan Zavareei	5/30/2022	1.8	Reviewing 5/3 expert reports and working with prospective experts on rebuttal reports.
Hassan Zavareei	5/31/2022	3.2	Reviewing 5/3 expert reports and working with prospective experts on rebuttal reports.
Hassan Zavareei	6/1/2022	3.2	Working with prospective experts on rebuttal reports.
Hassan Zavareei	6/1/2022	3.8	Working on rebuttal expert evaluation; calls with potential experts; vetting experts.
Hassan Zavareei	6/2/2022	6.7	Working to identify experts; calling potential experts.
Hassan Zavareei	6/16/2022	5.1	Working with experts on rebuttal expert reports.
Hassan Zavareei	6/17/2022	7.4	Working with experts on rebuttal expert reports.
Hassan Zavareei	6/20/2022	4.2	Working with experts on rebuttal expert reports.
Hassan Zavareei	6/21/2022	6.1	Working with experts on rebuttal expert reports.
Hassan Zavareei	6/22/2022	7.9	Working with experts on rebuttal expert reports.
Hassan Zavareei	6/23/2022	6.8	Working with experts on rebuttal expert reports.
Hassan Zavareei	6/24/2022	2.9	Prepping for expert depositions.
Hassan Zavareei	7/5/2022	3.1	Deposition preparation work.
Hassan Zavareei	7/28/2022	2.5	Assisted in preparation for deposition of Grice.

Timekeeper	Date	Time	Description
Hassan Zavareei	7/29/2022	1.8	Second chairing deposition of Grice.
Hassan Zavareei	8/2/2022	4.8	Attending Green deposition; emails and calls with S. Scott and co-counsel regarding deposition
Hassan Zavareei	8/11/2022	2.1	Expert witness preparation.
Hassan Zavareei	8/17/2022	8.9	Research for SJ opp; drafting, editing and revising SJ opp.
Hassan Zavareei	8/23/2022	2.1	Reviewing SJ motion; research re same.
			Research for opposition to SJ; call with co-counsel re same; reviewing draft/outline of
Hassan Zavareei	9/16/2022	2.9	opposition.
Hassan Zavareei	10/25/2022	3.7	Drafting, editing and revising SJ reply brief.
Hassan Zavareei	10/28/2022	2.8	Drafting, editing and revising SJ reply brief.
Hassan Zavareei	10/31/2022	4.7	Drafting, editing and revising SJ reply brief.
Hassan Zavareei	11/1/2022	3.7	Drafting, editing and revising SJ reply brief.
Hassan Zavareei	11/2/2022	4.1	Drafting, editing and revising SJ reply brief.
Hassan Zavareei	12/1/2022	1.9	Trial preparation.
Hassan Zavareei	12/15/2022	3.1	Trial preparation; call with Haac re trial prep; editing demand letter.
Hassan Zavareei	1/4/2023	2.1	Trial preparation.
Hassan Zavareei	1/5/2023	2.1	Meetings with team regarding trial strategy; reviewing settlement correspondence; call with OC
Hassan Zavareei	1/6/2023	3.8	Trial preparation; t/c with opposing counsel.
Hassan Zavareei	1/12/2023	1.3	Trial prep
			T/C with Pyser re case schedule, CMC, and settlement; drafting letter to Grace Royalty; drafting
Hassan Zavareei	1/12/2023	2.8	settlement demand.
			Pretrial work; call with defense counsel regarding pretrial matters; CMC; research for Daubert
Hassan Zavareei	1/19/2023	5.1	motions.
Hassan Zavareei	2/17/2023	3.9	Trial preparation.
Hassan Zavareei	2/22/2023	5.9	Drafting and editing in limine motions.
Hassan Zavareei	2/23/2023	1.3	Reviewing defendant in limine motions.
Hassan Zavareei	3/6/2023	2.8	Trial preparation.
Hassan Zavareei	3/7/2023	5.9	Trial preparation.
Hassan Zavareei	3/8/2023	3.1	Trial preparation.
Hassan Zavareei	3/9/2023	3.9	Trial preparation.
Hassan Zavareei	3/13/2023	2.9	Trial preparation.
Hassan Zavareei	3/14/2023	5.1	Trial preparation.
Hassan Zavareei	3/15/2023	3.8	Trial preparation.
Hassan Zavareei	3/16/2023	2.8	Trial preparation.
Hassan Zavareei	3/17/2023	3.2	Trial preparation.
Hassan Zavareei	3/22/2023	7.2	Trial Preparation.
Hassan Zavareei	3/22/2023		Trial Preparation.
		8.9	Trial Preparation.
Hassan Zavareei	3/24/2023	9.1	*
Hassan Zavareei	3/25/2023	5.2	Trial Preparation
Hassan Zavareei	3/26/2023	3.8	Trial Preparation.
Hassan Zavareei	3/27/2023	8.1	Trial Preparation.
Hassan Zavareei	3/28/2023	9.4	Trial Preparation.
Hassan Zavareei	7/5/2023	0.2	Research for fee reply.
Hassan Zavareei	7/13/2023	2.9	Editing reply in support of motion for judgment and fees.
Hassan Zavareei	7/14/2023	3.8	Editing reply in support of motion for judgment and fees.
Hassan Zavareei	8/21/2023	2.9	Working of fee declarations.
Hassan Zavareei	9/13/2023	2.1	Call with Haac regarding fee declarations.
Hassan Zavareei	9/26/2023	2.9	Working on fee declarations.
			Call regarding TILA fee briefing; call with Court regarding TILA fee briefing and notice; call
Hassan Zavareei	12/11/2023	3.1	with co-counsel re same, and related preparation.
Hassan Zavareei	12/13/2023	3.1	Reviewing detailed billing records.
Hassan Zavareei	12/20/2023	2.1	Reviewing brief; calls and emails with A. Haac regarding same.
Hassan Zavareei	12/21/2023	3.9	Editing brief and declaration; calls and emails with A. Haac regarding same.
James Morrison	5/11/2022	0.9	printing and assembling binders for Howard deposition
James Monison	7/20/2022	0.7	assisting Emma B with binder creation for HAZ
			, , , , , , , , , , , , , , , , , , ,
James Morrison			handling courtesy copy with Wilcox, Hart, and Green Grice filings
James Morrison James Morrison	2/23/2023	0.8	handling courtesy copy with Wilcox, Hart, and Green Grice filings  Pulling time and expense reports for c. carlson to review
James Morrison			handling courtesy copy with Wilcox, Hart, and Green Grice filings  Pulling time and expense reports for c. carlson to review  PAYDAY LENDING perform case development research.

Timekeeper	Date	Time	Description
Jeffrey Kaliel	2/29/2012	4.3	PAYDAY LENDING Case development and research.
Jeffrey Kaliel	3/1/2012	6.3	Case development and research
Jeffrey Kaliel	3/8/2012	3.1	PAYDAY LENDING Case development and research.
Jeffrey Kaliel	6/7/2012	2.9	FTB EARLY ACCESS case development
Jeffrey Kaliel	7/6/2012	1.8	FIFTH THIRD EARLY ACCESS CASE DEVEL
Jeffrey Kaliel	7/11/2012	0.2	Review case updates and to-do list with team
Jeffrey Kaliel	7/11/2012	0.9	case development and research
Jeffrey Kaliel	7/12/2012	4.4	Draft complaint; speak with potential plaintiffs
Jeffrey Kaliel	7/12/2012	4.2	Draft complaint
Jeffrey Kaliel	7/13/2012	6.8	T/c with potenial class reps; draft complaint
Jeffrey Kaliel	7/16/2012	3.1	Draft complaint; t/c with local counsel
Jeffrey Kaliel	7/22/2012	0.5	T/c with S Scott re: filing new case
Jeffrey Kaliel	7/30/2012	4.9	Finalize complaint; draft
Jeffrey Kaliel	7/30/2012	0.2	T/c with S. Harris
Jeffrey Kaliel	8/1/2012	0.8	Revise complaint and draft email to co counsel
Jeffrey Kaliel	8/3/2012	1.4	Revise complaint and prepare for filing
Jeffrey Kaliel	8/6/2012	0.1	Review judge assignment; prepare
Jeffrey Kaliel	9/7/2012	0.7	T/c with co-counsel re: settlement
Jeffrey Kaliel	9/16/2012	3.1	Perform comparative research on other banks' payday lending disclosures
Jeffrey Kaliel	9/18/2012	3.1	Research other bank's advance programs
Jerney Raner	7/10/2012	3.1	Research other bank's advance programs
Jeffrey Kaliel	9/18/2012	0.9	t/c with co-counsel re: complaint amendment; exchange email re: conversation with defendant
Jeffrey Kaliel	9/19/2012	0.7	Review case management order and procedures
Jeffrey Kaliel	9/30/2012	1.5	Payday lending research
Jeffrey Kaliel	10/1/2012	1.0	NEW PAYDAY LENDING CASE DEVEL T/c with J. Ostrow; draft client emails
Jeffrey Kaliel	10/1/2012	1.0	26(f) meet and confer
			Review and revise settlement letter.
Jeffrey Kaliel	10/5/2012	0.5	
Jeffrey Kaliel	10/5/2012	2.7	Draft 26(f) report and settlement letter.
Jeffrey Kaliel	10/5/2012	0.6	Draft 26(f) report and settlement letter.
Jeffrey Kaliel	10/12/2012	7.3	Draft venue brief.
Jeffrey Kaliel	10/15/2012	5.5	Draft venue brief
Jeffrey Kaliel	10/16/2012	1.2	Revise and prepare venue brief for filing.
Jeffrey Kaliel	10/18/2012	0.7	Review and revise motion to excuse attendance; t/c with clients re: same.
Jeffrey Kaliel	10/22/2012	0.1	Discuss case updates and to-do list at team meeting.
Jeffrey Kaliel	10/22/2012	0.7	Review and revise 26(f) report.
Jeffrey Kaliel	10/23/2012	0.5	Review amended complaint.
Jeffrey Kaliel	11/6/2012	0.8	T/c with
Jeffrey Kaliel	11/14/2012	0.6	T/c with co-counsel re: brief
Jeffrey Kaliel	12/10/2012	5.1	Draft opp. to MTD
Jeffrey Kaliel	12/10/2012	5.4	Draft opp. to MTD
Jeffrey Kaliel	12/11/2012	11.3	T/c with co-counsel; draft opp. to MTD
Jeffrey Kaliel	12/12/2012	8.1	Draft opp. to MTD
Jeffrey Kaliel	12/13/2012	6.7	Revise response to MTD
Jeffrey Kaliel	12/14/2012	3.1	Draft response to MTD
Jeffrey Kaliel	1/9/2013	0.9	Review defendant's draft 26(f) report
Jeffrey Kaliel	1/11/2013	0.6	Review draft 26(f) report and respond to opposing counsel re: same
Jeffrey Kaliel	1/15/2013	0.7	T/C with
Jeffrey Kaliel	1/16/2013	1.8	Draft discovery requests; review reply brief.
Jeffrey Kaliel	1/17/2013	3.5	Draft discovery requests; research potential surreply
Jeffrey Kaliel	1/17/2013	0.1	Discuss case updates and to-do list at team meeting.
Jeffrey Kaliel	1/18/2013	1.2	T/c with re: surreply
Jeffrey Kaliel	1/18/2013	1.3	draft outline for surreply
Jeffrey Kaliel	1/22/2013	6.1	Prepare discovery requests; draft surreply; t/c with co counsel re: status hearing.
Jeffrey Kaliel	1/29/2013	2.8	Revise surreply.
Jeffrey Kaliel	1/30/2013	1.1	Revise surreply.
Jeffrey Kaliel	2/6/2013	2.1	Research 5/3 public financial filings re: Early Access program.
Jeffrey Kaliel	2/20/2013	1.1	Review and propose revisions to settlement structure proposal.
Jeffrey Kaliel	2/20/2013	0.5	T/c with opposing counsel; t/c with B. Barnow.
Jeffrey Kaliel	2/21/2013	4.1	Perform research regarding OCC and OTS action on payday lending by banks
Jeffrey Kaliel	2/25/2013	3.4	Prepare talking points and important documents for settlement conference.
JULIEV NAMEL	4/43/4013	J. <del>+</del>	propare and mig points and important documents for settlement collective.

Timekeeper	Date	Time	Description				
Jeffrey Kaliel	2/26/2013	1.6	Prepare for settlement meeting.				
Jeffrey Kaliel	3/4/2013	1.2	T/c with co-counsel re: Florida case; draft letter to FL/AR lawyers.				
Jeffrey Kaliel	3/5/2013	2.4	Draft ; draft letter to Lasarkis counsel.				
Jeffrey Kaliel	3/6/2013	1.5	Draft ; draft letter to Lasarkis counsel.				
Jeffrey Kaliel	3/15/2013	0.5	T/c with B. Barnow re: settlement letter.				
Jeffrey Kaliel	3/19/2013	0.5	Prepare				
Jeffrey Kaliel	3/20/2013	0.1	Discuss case updates and to-do list at team case meeting.				
Jeffrey Kaliel	3/22/2013	4.2	Research EFTA claim; draft settlement email to opposing counsel.				
Jeffrey Kaliel	3/27/2013	0.8	Draft letter to Arkansas lawyers.				
Jeffrey Kaliel	3/29/2013	2.2	Draft motion to enjoin Lasarkis case in SDFL.				
Jeffrey Kaliel	4/1/2013	4.9	Draft motion to stay Lasarkis proceedings.				
Jeffrey Kaliel	4/2/2013	0.7	Review FTB filing in S.D. Florida re: first to file maintenance.				
Jeffrey Kaliel	4/4/2013	0.5	Prepare for and attend telephonic status conference.				
Jeffrey Kaliel	4/8/2013	5.6	Draft motion to intervene and transfer.				
Jeffrey Kaliel	4/9/2013	3.1	Draft motion for appointment of interim class counsel				
Jeffrey Kaliel	4/9/2013	0.2	T/c with S. Scott				
Jeffrey Kaliel	4/18/2013	1.9	Prepare motion for appointment of lead counsel.				
Jeffrey Kaliel	4/26/2013	1.6	Revise motion to appoint lead counsel.				
Jeffrey Kaliel	4/29/2013	0.4	Exchange email with co counsel re: motion for leave to amend complaint.				
Jeffrey Kaliel	4/29/2013	0.6	Revise leadership brief.				
Jeffrey Kaliel	4/29/2013	1.3	Finalize declaration for leadership brief.				
Jeffrey Kaliel	4/30/2013	2.3	Review and revise draft motion for leave to amend.				
Jeffrey Kaliel	5/1/2013	0.6	Draft second amended complaint.				
Jeffrey Kaliel	5/8/2013	0.5	Review Federal Reserve advisory of deposit advance products; draft email to co counsel.				
Jeffrey Kaliel	5/24/2013	0.5	Attend telephonic status hearing.				
Jeffrey Kaliel	6/5/2013	1.2	Draft letter to S. Owings.				
Jenney Kaner	0/3/2013	1.2	Review Judge Alsup order: re Owings firm class certification; exchange email with co-counsel				
Laffray Valial	6/26/2013	0.8	re: same.				
Jeffrey Kaliel Jeffrey Kaliel	6/27/2013	1.0	Attend status conference; t/c with co-counsel.				
•	-		,				
Jeffrey Kaliel	7/2/2013	5.1	Revise draft reply in support of leadership motion.				
Jeffrey Kaliel	7/3/2013	2.4	Draft leadership motion reply brief.				
Jeffrey Kaliel	7/3/2013	8.4	Draft reply to leadership brief.				
Jeffrey Kaliel	7/7/2013	2.2	Draft leadership motion reply brief.				
Jeffrey Kaliel	7/8/2013	7.3	Draft leadership motion reply brief.				
Jeffrey Kaliel	7/8/2013	2.8	Review and revise leadership reply brief.				
Jeffrey Kaliel	7/10/2013	2.1	Prepare lead counsel reply brief for filing.				
Jeffrey Kaliel	7/19/2013	0.4	T/c with co-counsel re:				
Jeffrey Kaliel	8/6/2013	2.8	Internet research on Early Access program history and public statements re: same by FTB.				
Jeffrey Kaliel	8/6/2013	0.7	Research news reports on Early Access program.				
Jeffrey Kaliel	8/15/2013	1.0	T/c with potential expert				
Jeffrey Kaliel	8/19/2013	0.8	T/c with co-counsel re: consolidated amended complaint.				
Jeffrey Kaliel	8/27/2013	2.2	Research distinction between open-ended and closed-ended credit.				
Jeffrey Kaliel	8/27/2013	0.5	Review CFPB White Paper re: deposit advance products.				
Jeffrey Kaliel	8/27/2013	4.4	Research closed-ended vs. open-ended TILA distinction; email co counsel.				
Jeffrey Kaliel	9/3/2013	0.5	Contact re: consulting.				
Jeffrey Kaliel	10/2/2013	1.5	Gather plaintiff factual information for amended complaint.				
Jeffrey Kaliel	10/9/2013	0.5	T/c with E. Schork and S. Harris.				
Jeffrey Kaliel	10/11/2013	7.2	Draft CAC.				
Jeffrey Kaliel	10/15/2013	1.8	Prepare CAC.				
Jeffrey Kaliel	12/17/2013	0.5	T/c with co counsel re: response to MTD.				
Jeffrey Kaliel	1/13/2014	2.9	Draft opp. to MTD.				
Jeffrey Kaliel	1/14/2014	8.0	Integrate brief sections and draft opp. to motion to dismiss.				
Jeffrey Kaliel	1/15/2014	11.2	Draft opp. to MTD.				
Jeffrey Kaliel	1/15/2014	0.4	Conference with H. Zavareei re: MTD opposition.				
Jeffrey Kaliel	1/15/2014	2.2	Review and revise draft MTD response.				
Jeffrey Kaliel	1/17/2014	6.9	Revise opp.to MTD.				
-			Revise opp. to MTD; incorporate comments.				
Jeffrey Kaliel	1/18/2014	4.6					
	1/19/2014	5.2	Revise opp. to MTD; incorporate comments.				
Jeffrey Kaliel	+	C A	Finaliza ann ta MTD				
Jeffrey Kaliel  Jeffrey Kaliel	1/21/2014 8/12/2014	6.4 1.5	Finalize opp. to MTD.  Draft notice of supplemental authority.				

Timekeeper	Date		Description				
Jeffrey Kaliel	6/25/2015	1.4	Review discovery responses.				
Jeffrey Kaliel	7/15/2015	1.7	Draft letter to Fanter.				
T CC TZ 1: 1	7/22/2015	1.0	Prepare for meet and confer with opposing counsel; attend meet and confer re: scope of				
Jeffrey Kaliel	7/23/2015	1.0	discovery.				
Jeffrey Kaliel	9/3/2015	0.9	Prepare for meet and confer; t/c with opposing counsel.				
Jeffrey Kaliel	9/3/2015	0.6	T/c with opposing counsel re: scope of discovery.				
Jeffrey Kaliel	9/10/2015	1.2	Draft ESI protocol and proposed search terms.				
Jeffrey Kaliel	9/15/2015	3.3	Review document production.				
Jeffrey Kaliel	9/15/2015	0.0	Office conference re: providing update on litigation to clients.				
Jeffrey Kaliel	9/23/2015	0.3	Draft email to opposing counsel re: search terms.				
Jeffrey Kaliel	10/2/2015	0.5	Draft email to opposing counsel re: search terms.				
Jeffrey Kaliel	10/7/2015	0.4	Exchange email with opposing counsel.				
Jeffrey Kaliel	10/8/2015	0.5	Exchange email with co counsel re: settlement.				
Jeffrey Kaliel	11/5/2015	0.4	Draft email to opposing counsel.				
Jeffrey Kaliel	12/9/2015	1.0	Review and revise letter to J. Barrett; review letter prior to finalization				
Jeffrey Kaliel	9/2/2016	2.4	Draft draft term sheet				
Jeffrey Kaliel	9/8/2016	4.2	Draft term sheet				
Jeffrey Kaliel	9/9/2016	1.7	Draft term sheet.				
Jeffrey Kaliel	9/9/2016	0.5	Exchange email re: term sheet				
Jeffrey Kaliel	9/26/2016	3.0	Review and revise term sheet; t/c with opposing counsel.				
Jeffrey Kaliel	9/28/2016	1.9	Review and revise term sheet				
Jeffrey Kaliel	9/28/2016	0.4	Review draft MOU from defense counsel				
Jeffrey Kaliel	9/29/2016	1.5	Review email correspondence with defense counsel; discuss with HAZ				
Jeffrey Kaliel	10/3/2016	0.4	Discuss release language with co counsel				
Jeffrey Kaliel	10/6/2016	0.5	Review term sheet and revise				
Jeffrey Kaliel	10/7/2016	0.5	Review term sheet				
Jeffrey Kaliel	10/9/2016	0.5	Review term sheet				
Jeffrey Kaliel	10/11/2016	0.3	Exchange email with co counsel				
Jeffrey Kaliel	10/12/2016	0.5	T/c with co counsel				
Jeffrey Kaliel	10/12/2016	0.3	T/c with co counsel re settlement				
Jeffrey Kaliel	10/12/2016	0.4	Exchange email with co counsel; prepare list of needed data				
Jeffrey Kaliel	10/13/2016	0.8	T/c with K Fanter				
Jeffrey Kaliel	10/13/2016	1.6	Prepare for call with K Fanter; t/c with Fanter.				
Jeffrey Kaliel	10/14/2016	0.4	Draft email summarizing data needs to K Fanter				
Jeffrey Kaliel	10/14/2016	0.4	Exchange email with co counsel				
•		0.3	Email with K Fanter				
Jeffrey Kaliel	10/21/2016	0.2	Email with K Fanter				
Jeffrey Kaliel	10/27/2016						
Jeffrey Kaliel	10/28/2016	6.9	Draft settlement agreement				
Jeffrey Kaliel	11/8/2016	0.4	T/c with K Fanter.				
Jeffrey Kaliel	11/28/2016	0.5	T/c with Fanter				
Jeffrey Kaliel	11/30/2016	1.6	T/c with co counsel re settlement; office conference				
Jeffrey Kaliel	12/27/2016	1.0	T/c with Fanter; prepare for call				
Jeffrey Kaliel	1/12/2017	0.6	T/c with co counsel and defense counsel				
Jeffrey Kaliel	1/27/2017	2.2	Revise letter to 5/3				
Jeffrey Kaliel	1/30/2017	0.3	Draft letter to opposing counsel				
Jeffrey Kaliel	3/8/2017	0.8	Review settlement correspondence				
Jeffrey Kaliel	5/12/2017	0.5	T/c with CVG counsel.				
Karen Ressue	4/11/2013	0.2	Call with journalist from Dan Rather Reports re payday lending and case against Fifth Third.				
Karen Ressue	7/10/2013	0.2	Compare T&Z Complaint with Florida Complaint and				
Karen Ressue	7/10/2013	0.2	Compile and send documents to Spangenberg Shibley for use as exhibits.				
			Create binder of documents for H. Zavareei's use in 7-12-2013 status conference; Schedule				
Karen Ressue	7/11/2013	1.0	messenger to deliver binder.				
			Finish reviewing Complaints and highlighting copying examples; Send highlighted version of				
Karen Ressue	7/12/2013	0.8	Laskaris Complaint to H. Zavareei.				
Matthew Folkerts	5/28/2019	0.2	Downloadings Briefs from Pacer.				
Matthew Folkerts	5/29/2019	0.7	Finding relevant correspondence relating to past settlement talks.				
Matthew Folkerts	7/11/2019	1.4	Assist with Finalizing and Serving New Discovery Requests.				

Timekeeper	Date	Time	Description				
Matthayy Fallranta	9/20/2010	1.2	Draft Pro Hac Vice Motion for A. Haac and Assist with Letter Template for Correspondence with Opposing Counsel.				
Matthew Folkerts  Matthew Folkerts	8/30/2019 9/10/2019	0.2	Finalize and Send out Discovery Letter to Opposing Counsel.				
Matthew Folkerts	9/10/2019	0.2	Saving Pleadings.				
Matthew Folkerts	10/7/2019	0.2	Saving Pleadings to Files.				
Matthew Folkerts		0.1	Saving Pleadings to Files.  Saving Pleadings and Calendaring Deadlines.				
Matthew Folkerts	10/17/2019	0.1	Saving Fleadings and Catendaring Deadrines.				
Matthaux Fallranta	10/21/2010	0.2	Sand A. Hana Dagwign link for A. McVinney to sign, correspondence with A. Hana ray same				
Matthew Folkerts	10/21/2019	0.3	Send A. Haac Docusign link for A. McKinney to sign; correspondence with A. Haac re: same. File Matinence.				
Matthew Folkerts	11/22/2019		Create Template letter.				
Matthew Folkerts	12/9/2019	0.5					
Matthew Folkerts	12/18/2019	0.3	Save Pleadings and Calendar Deadlines.				
Matthew Folkerts	12/18/2019	0.1	Send correspondence to opposing counsel.				
Matthew Folkerts	12/20/2019	0.2	Draft Template for 30(b)(6) deposition notice.				
			Save Pleadings to files; review correspondence re: team; create template for Plaintiffs' second				
Matthew Folkerts	1/2/2020	1.1	requests for production.				
Matthew Folkerts	1/8/2020	0.3	Calendaring Depositions; Saving L. Laskaris Deposition Transcript to files.				
			Draft Plaintiffs' Third Set of Requests for Interrogatories; look for past correspondence from				
Matthew Folkerts	1/9/2020	1.7	defendants; finalize and send discovery requests.				
Matthew Folkerts	3/23/2020	0.9	Edit and Finalize Settlement Letter.				
Matthew Folkerts	4/14/2020	0.6	Call with A. Haac re: Class Cert Brief Work.				
Matthew Folkerts	4/14/2020	1.7	Drafting Supporting Declarations for Class Cert Motion; checking on exhibits.				
Matthew Folkerts	4/15/2020	1.7	Find and review exhibits for Class Cert Motion.				
Matthew Folkerts	4/16/2020	1.3	Research re: Filing documents under seal in Southern District of Ohio.				
Matthew Folkerts	4/16/2020	2.6	Research re: rules for sealing for Class Certification; create templates for Class Cert documents				
Matthew Folkerts	4/17/2020	1.6	Calculate Billing and pull related documents re: Declaration for Class Certification Motion.				
Matthew Folkerts	4/20/2020	2.7	Edit and Check case cites for Brief.				
			Edit tables and citations for Class Certification Brief; edit and organize exhibits; finalize and fi				
Matthew Folkerts	4/20/2020	8.0	brief.				
Maura Dunn	4/13/2020	1.9	Pull exhibits and converting motion to class certification				
Maura Dunn	4/27/2020	3.2	Filing unredacted version of brief				
Maura Dunn	4/27/2020	0.2	Downloading/circulating depo material to co-counsel				
Maura Dunn	4/28/2020	0.4	Filing				
Maura Dunn	4/28/2020	0.1	Saving depo transcripts				
Maura Dunn	5/29/2020	0.3	Pulling PDF and Word version of Arthur Olsen Declaration for A. Haac				
Maura Dunn	5/29/2020	0.9	Research and Calendar Opposition Dates for A. Haac				
			Saving expert discovery, looking for confidential documents, and sending list of bates numbers				
Maura Dunn	6/2/2020	1.7	on the UDrive for A. Haac				
Maura Dunn	6/3/2020	0.2	Saving, Calendaring and Circulating ECF				
Maura Dunn	6/4/2020	0.1	Filing Documents into NetDocs				
Maura Dunn	6/10/2020	0.2	Saving and Circulating ECF				
Maura Dunn	6/22/2020	0.2	Saving Invoice to NetDocs				
Maura Dunn	6/30/2020	0.1	Converting Letter to opposing counsel and sending for A. Haac				
Maura Dunn	7/8/2020	0.1	Saving Email into NetDocs for A. Haac				
Maura Dunn	7/10/2020	0.1	Saving Invoices to NetDocs for H. Zavareei				
Maura Dunn	7/20/2020	0.1	Saving and Cirulating ECFs				
Maura Dunn	7/20/2020	0.1	Saving and Circulating ECF				
Maura Dunn	7/27/2020	0.1	Uploading Production to NetDocs for A. Haac				
Maura Dunn	8/3/2020	0.1	Saving and Circulating ECF				
Maura Dunn	8/6/2020	0.1	Saving, Circulating and Calendaring ECF				
Maura Dunn Maura Dunn	8/6/2020	0.2	Saving and Circulating ECF				
Maura Dunn Maura Dunn	8/7/2020	0.1	Adding in Call in instructions to calendar date				
		0.2	Saving and Circulating ECF				
Maura Dunn	8/11/2020						
Maura Dunn	8/18/2020	0.3	Researching Class Cert Reply				
Maura Dunn	8/19/2020	0.4	Reaching out to the court for an exhibit for A. Haac				
Maura Dunn	8/19/2020	0.2	Downloading Audio for A. Haac				
Maura Dunn	9/1/2020	0.3	Checking Docket for A. Haac				
Maura Dunn	9/1/2020	0.1	Calendaring and Forwarding A. Haac ECF				
Maura Dunn Maura Dunn	9/3/2020	0.1	Downloading and Circulating ECF Saving and circulating ECF				
	9/23/2020	0.1	the annual and a family fine 17707				

Timekeeper	Date	Time	Description				
Maura Dunn	9/24/2020	0.1	Circulating and Calendaring ECF				
Maura Dunn	9/24/2020	0.1	Saving and Circulating ECF				
Maura Dunn	9/25/2020	1.4	Editing and Checking Case Cites Motion to Leave for File				
Maura Dunn	9/25/2020	0.2	Researching local rules				
Maura Dunn	9/25/2020	0.1	Forwarding A. Haac Rules				
Maura Dunn	9/28/2020	0.3	Researching local rules				
Maura Dunn	9/28/2020	0.4	Drafting Proposed Order				
Maura Dunn	9/28/2020	1.4	Filing				
Maura Dunn	9/28/2020	0.4	Emailing proposed order to the judge				
Maura Dunn	9/30/2020	0.1	Saving and circulating ecf				
Mia Goschalk	7/10/2012	0.6	Set up new matter. Save all relevant documents for it. Draft for client.				
Mia Goschalk	7/11/2012	0.2	Review case updates and to-do list with case team.				
Mia Goschalk	7/12/2012	0.3	Complete client intake sheet for W. Klopfenstein.				
Mia Goschalk	7/13/2012	0.3	Save various documents to case file for J. Kaliel. Send client				
Mia Goschalk	7/16/2012	0.5	Complete intake form for A. McKinney. Draft				
Mia Goschalk	8/3/2012	0.2	Send client information to co-counsel.				
Mia Goschalk	8/17/2012	0.3	Contact Ohio court re H. Zavareei's admission.				
Mia Goschalk	8/21/2012	1.3	Draft pro hac vice motion. Send to clients.				
Mia Goschalk	8/22/2012	0.3	E-mail coorespondence with S. Harris re pro hac vice admission in Ohio.				
Mia Goschalk	8/22/2012	0.1	Finalize pro hac vice motion.				
Mia Goschalk	8/31/2012	0.5	Finalize pro hac vice motion and send to co-counsel.				
Wila Goscilaik	0/31/2012	0.5	Finalize and notarize affidavits for motion for admission pro hac vice. Send to P. Fretchen for				
Mia Goschalk	9/4/2012	1.0	filing.				
Mia Goschalk	9/17/2012	0.2	Edit				
Mia Goschalk	9/17/2012	0.2	Register H. Zavareei and J. Kaliel for ecf filings for case.				
Mia Goschalk	9/21/2012	0.1	Finalize J. Kaliel and H. Zavareei's pro hac and ecf registration process.				
	9/21/2012	0.2	Try calling court's ecf help desk to change H. Zavareei's ecf notification email address.				
Mia Goschalk		0.5	Email complaint to J. Ostrow for J. Kaliel.				
Mia Goschalk	9/26/2012						
Mia Goschalk	10/16/2012	0.2	E-mail correspondence with co-counsel re filing of venue brief.				
Mia Goschalk	10/22/2012	0.1	Discuss case updates and to-do list at case meeting.				
) (' C 1 !!	11/7/2012	0.5					
Mia Goschalk	11/7/2012	0.5	Research pro hac vice admission rules for southern district of OH. Draft motion for admission.				
) (' G 1 !!	11/12/2012	0.2	Finalize pro hac vice motions for H. Zavareei and J. Kaliel. Request certificates of good				
Mia Goschalk	11/13/2012	0.2	standing for both.				
			Send requests for certificates of good standing for H. Zavareei and J. Kaliel pro hac vice				
Mia Goschalk	11/14/2012	0.4	applications.				
Mia Goschalk	11/20/2012	0.3	Finalize motions for pro hac vice admission.				
Mia Goschalk	11/21/2012	0.1	Send P. Frietchen pro hac vice motions.				
Mia Goschalk	11/27/2012	0.1	Request reimbursement to SSL for pro hac vice fees.				
Mia Goschalk	12/3/2012	0.5	Register H. Zavareei and J. Kaliel for ecf access.				
Mia Goschalk	12/4/2012	0.1	Update login information for H. Zavareei.				
Mia Goschalk	1/16/2013	0.1	Send pleadings to S. Harris.				
Mia Goschalk	1/17/2013	0.1	Discuss case updates and to-do list at case meeting.				
Mia Goschalk	1/23/2013	0.3	Research				
Mia Goschalk	1/23/2013	0.6	Listen in on status conference with H. Zavareei.				
Mia Goschalk	1/24/2013	0.2	Send S. Harris most recent pleadings.				
Mia Goschalk	2/7/2013	0.4	Call potential class members re case.				
Mia Goschalk	2/13/2013	0.1	Speak with potential class member				
Mia Goschalk	2/19/2013	0.3	Speak with H. Zavareei re researching claim form cases.				
Mia Goschalk	2/19/2013	1.2	Research class actions and usage of claim form in settlements for H. Zavareei.				
Mia Goschalk	2/25/2013	1.2	Compile documents for H. Zavareei's settlement conference and send to Chicago.				
Mia Goschalk	3/19/2013	0.6	Finalize to send to Lasarkis counsel. Send.				
Mia Goschalk	3/20/2013	0.1	Discuss case updates and to-do list at case team meeting.				
	3/20/2013	0.1	Look up information on status conference details.				
Mia Goschalk		0.1	Pull motion to dismiss briefing.				
Mia Goschalk Mia Goschalk	4/4/2017						
Mia Goschalk	4/4/2013 4/9/2013		Edit motion to stay in Florida action. Edit motion to appoint firm as interim lead counsel				
Mia Goschalk Mia Goschalk	4/9/2013	1.7	Edit motion to stay in Florida action. Edit motion to appoint firm as interim lead counsel.  Edit letter to Laskaris counsel and send.				
Mia Goschalk			Edit motion to stay in Florida action. Edit motion to appoint firm as interim lead counsel.  Edit letter to Laskaris counsel and send.  Pull CFPB report for J. Kaliel.				

Timekeeper	Date	Time	Description				
Mia Goschalk	4/30/2013	1.0	Edit and finalize motion for appointment of interim class counsel. File. Send courtesy copy.				
Mia Goschalk	4/30/2013	0.2	Edit motion to file amended complaint.				
Mia Goschalk	5/1/2013	0.3	Edit Second Amended Complaint.				
Mia Goschalk	5/7/2013	0.7	Edit motion to file and second amended complaint.				
Mia Goschalk	5/8/2013	0.5	Finalize and file motion to file second amended complaint.				
Mia Goschalk	5/20/2013	0.3	Download other Fifth Third Early Access case dockets. Send to H. Zavareei.				
Mia Goschalk	6/5/2013	0.6	Edit and format letter from H. Zavareei to S. Owings for J. Kaliel.				
Nathan Laporte	9/8/2016	0.3	Find non-corrupted timesheet file for cocounsel.				
Nathan Laporte	9/8/2016	0.9	Convert PDF term sheet to word format.				
Nathan Laporte	9/15/2016	0.5	Create and send time and expense reports.				
Nathan Laporte	9/26/2016	0.5	Track co-counsel time and check time reporting policy.				
Nathan Laporte	9/28/2016	0.3	Contact clients re settlment.				
-							
Nathan Laporte	10/17/2016	0.5	Create time report. Create fifth third binder.				
Nathan Laporte	10/27/2016	2.9					
Nathan Laporte	10/28/2016	0.5	Update time entries.				
Nathan Laporte	10/31/2016	1.6	Amend draft settlement agreement.				
Nathan Laporte	11/1/2016	0.2	Update Spanglaw time reports.				
Nathan Laporte	11/1/2016	0.3	Implement changes to sett. agreement.				
Nathan Laporte	11/16/2016	0.3	Create time report.				
Nathan Laporte	11/23/2016	0.5	Update time reporting binder.				
Nathan Laporte	1/17/2017	0.4	Format letter to opp. counsel.				
Nathan Laporte	1/31/2017	0.4	Format letter to defense counsel.				
Nathan Laporte	2/1/2017	0.3	printing documents for J. Kaliel.				
Nathan Laporte	2/16/2017	0.4	Draft letter to opp. counsel.				
Nathan Laporte	3/16/2017	0.3	Finalize letter to opp. counsel.				
Nathan Laporte	3/17/2017	0.3	Edit and send correspondence.				
Nathan Laporte	3/29/2017	0.2	Format letter to Judge.				
Nathan Laporte	2/8/2018	0.8	Format and proof brief.				
Nicole Porzenheim	11/15/2019	3.0	Case Research				
Nicole Porzenheim	1/2/2020	0.2	Locating client contact information				
Nicole Porzenheim	1/13/2020	0.4	Preparing binder for deposition prep				
Nicole Porzenheim	1/13/2020	0.1	Uploading client documents				
Nicole Porzenheim	1/16/2020	1.0	Coordinating with venue to secure location for deposition prep.				
Nicole Porzenheim	1/16/2020	1.0	Putting together depo prep binder for Hassan				
Nicole Porzenheim	1/17/2020	0.2	Coordinating with depo prep location to secure booking				
Nicole Porzenheim	2/21/2020	0.4	Creating depo prep binder				
Nicole Porzenheim	3/16/2020	0.4	Internal communication re deposition scheduling				
Nicole Porzenheim	3/16/2020	3.2	Creating binder for 30(b)(6) deposition				
Nicole Porzenheim	4/6/2020	0.2	Pulling brief template for Anna				
Nicole Porzenheim	4/20/2020	0.2	Bluebooking for class certification brief				
Nicole Porzenheim	8/5/2020	0.9	Researching Fifth Third Profit and Revenue over last 6 years for A.Haac				
Nicole Porzenheim	2/5/2021	0.1	Uploading and circulating case filings				
Nicole Porzenheim	4/7/2021	0.1	Sending case documentation to settlement administrators				
Nicole Porzenheim	4/16/2021	0.3	Researching how to submit ruling to WestLaw				
Nicole Porzenheim	6/16/2021	0.1	Looking for document				
Nicole Porzenheim	7/20/2021	0.1	Searching for dial-in number for status conference				
Nicole Porzenheim	2/18/2022	1.5	Updating citations to MSJ				
Nicole Porzenheim	3/23/2022	1.0	Communications re sealing				
Nicole Porzenheim	4/20/2022	0.3	Call re MSJ				
Shana Khader	12/15/2022	0.2	Meet with HAZ and A. Haac re: case status and needs				
Shana Khader	12/20/2022	0.8	Trial prep strategy meeting w/TZ team				
Shana Khader	12/22/2022	1.2	Phone conf w/all co-counsel re: strategy for trial prep, focus group, Daubert motions				
Shana Khader	12/30/2022	0.2	Review upcoming deadlines, next steps				
Shana Khader	1/3/2023	0.1	Review mult corr re: trial prep witness and exhibit lists				
Shana Khader	1/3/2023	4.1	Reviewing key case documents to get up to speed				
Shana Khader	1/3/2023	0.4	Phone conf w/A. Haac re: division of labor on 702 motions, pre-trial schedule				
.====			Continue review of key case docs to get up to speed: MSJ responses/replies; pattern jury				
			,				
Shana Khader	1/4/2023	2.3	instructions; prior settlement docs				

Timekeeper	Date	Time	Description P (201)					
Shana Khader	1/5/2023	0.1	Review draft response to R. 408 letter					
Shana Khader	1/5/2023	0.1	Set up access to and review structure of discovery database					
Shana Khader	1/5/2023	0.1	Review settlement corr from opposing counsel					
Shana Khader	1/5/2023	0.7	Phone conf w/TZ team re: trial exhibits, motions in limine content, strategy					
Shana Khader	1/6/2023	0.1	Review list of Barret 702 decisions					
Shana Khader	1/6/2023	0.5	Meeting with A. Haac and C. Carlson re: expert MILs					
Shana Khader	1/6/2023	1.3	Trial prep strategy meeting (MILs, jury questionnaire, focus group)					
Shana Khader	1/9/2023	0.1	Mult corr w/team re: trial prep, exhibits, depo review					
Shana Khader	1/10/2023	0.1	Review revised deadline, schedule proposed by 5/3					
Shana Khader	1/11/2023	0.1	Phone conf w/HAZ re: case staffing, focus group planning					
Shana Khader	1/11/2023	0.1	Review various corr re: settlement incl. draft letter to D					
Shana Khader	1/11/2023	0.1	Review mult. corr on trial strategy; narrative on multiple loans					
Shana Khader	1/11/2023	0.1	Corr to C. Carlson re: research for Daubert motions					
Shana Khader	1/12/2023	0.1	Review mult corr re: settlement negotiations, approach, demand					
Shana Khader	1/12/2023	0.9	Meet with A. Haac and C. Carlson re: motions to exclude experts, research, reviewing transcrip					
Shana Khader	1/13/2023	0.1	Review form pretrial order					
Shana Khader	1/13/2023	0.1	Review C. Carlson meeting notes					
Shana Khader	1/13/2023	1.2	Phone conf w/co-counsel re: pretrial deadlines, motions in limine, witnesses/depo review					
Shana Khader	1/13/2023	0.3	Corr to focus group planning team re: strategy and prep plan from yesterday's meeting					
Shana Khader	1/13/2023	0.3	Review draft settlement letter					
Shana Khader	1/15/2023	0.1	Review sample jury instructions from Barrett trial					
Shana Khader		0.1	Review standing order re: trial schedule, voir dire procedures					
	1/15/2023							
Shana Khader	1/15/2023	0.1	Review annotated proposed schedule by A. Haac					
Shana Khader	1/17/2023	0.2	Mult corr on trial themes, strategy, key docs					
Shana Khader	1/18/2023	0.9	Phone conf w/A. Haac, C. Carlson re: R. 702 briefs, research findings/add'l research, outlines					
Shana Khader	1/19/2023	0.1	Several corr re: voir dire, Daubert motions, evidentiary issues					
Shana Khader	1/19/2023	0.1	Review notes from conference w/Barret					
Shana Khader	1/19/2023	0.5	Conf w/co-counsel re: prep for status conference					
Shana Khader	1/20/2023	1.1	Trial prep status and strategy call with OC					
Shana Khader	1/20/2023	0.2	Review revised deadlines, minute order					
Shana Khader	1/20/2023	1.3	Review Howard Depo exhibits and testimony re: same					
Shana Khader	1/23/2023	0.1	Corr w/co-counsel re: trial themes/strategy					
Shana Khader	1/23/2023	0.2	Mult corr re: research for motions in limine, status					
Shana Khader	1/24/2023	1.0	Revise legal standards per call; begin draft of qualification section					
Shana Khader	1/27/2023	0.3	Various corr re: key documents, demonstratives					
Shana Khader	1/27/2023	0.3	Corr re: demonstrative exhibit					
Shana Khader	1/30/2023	0.1	Phone conf w/HAZ re: jury instructions, verdict form					
Shana Khader	1/30/2023	0.3	Corr to A. Haac re: witness availability					
Shana Khader	1/30/2023	0.1	Corr re: jury instructions, verdict form					
Shana Khader Shana Khader	1/30/2023	0.1	Review proposed schedule from OC					
Shana Khader Shana Khader	1/30/2023	0.1	Mult corr re: draft jury instructions and verdict form					
Shana Khader Shana Khader	2/1/2023		Corr to A. Reynolds about jury instruction research					
Shana Khader Shana Khader		0.1 1.0	Trial prep meeting w/co-counsel					
	2/3/2023	0.2	Review draft opening presentation sent by S Scott					
Shana Khader	2/6/2023	0.2	Phone conf w/ANC, C. Carlson re: add'l research for MILs; next steps on trial prep					
Shana Khader	2/6/2023							
Shana Khader	2/6/2023	0.2	Corr from HAZ ro, receased					
Shana Khader	2/6/2023	0.1	Corr from HAZ re: research					
Shana Khader	2/6/2023	0.1	Initial review of proof chart					
Shana Khader	2/6/2023	0.1	Review draft demonstratives re APR					
Shana Khader	2/6/2023	0.1	Review AH memo re: APR calculation/expert testimony					
Shana Khader	2/6/2023	0.1	Review draft demonstratives re: average loan length					
Shana Khader	2/9/2023	0.3	Calculate APR examples and send to S. Scott					
Shana Khader	2/10/2023	0.6	Review rebuttal expert report of Joseph Green					
Shana Khader	2/10/2023	0.3	Review expert report of Charles Grice					
Shana Khader	2/10/2023	0.2	Review ANH notes re: MIL on Grice and Green					
			Phone conf w/co-counsel re: proof chart, witness assignment, deadlines (45m); phone conf w/z					
Shana Khader	2/10/2023 2/13/2023	1.0	Haac re: Grice/Green MILs tasks, strategy (15m)  Review/annotate second half of Grice depo transcript (DR did first half)					

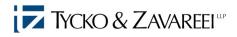
Timekeeper	Date	Time	Description
Shana Khader	2/14/2023	0.2	Mult. corr with HAZ, ANH, CC re: use of depositions at trial, plaintiff depos
Shana Khader	2/14/2023	0.1	Review/respond to corr re: utility of depo videos of our clients
Shana Khader	2/15/2023	1.5	Review/highlight B. Howard depo (trial prep)
Shana Khader	2/17/2023	0.5	Draft list if possible MILs and send to co-counsel
Shana Khader	2/17/2023	0.2	Review/respond to ANH corr re: MILs
Shana Khader	2/17/2023	0.4	Revise/recirculate list of potential MILs
Shana Khader	2/17/2023	1.4	Finish review/highlights of Howard depo (trial prep)
Shana Khader	2/17/2023	0.1	Mult corr w/co-counsel re: potential settlement negotiations, posture
Shana Khader	2/17/2023	0.2	Mult corr re: trial strategy, motions in limine
Shana Khader	2/17/2023	0.9	Legal research re: late disclosure; corr to HAZ and ANH re: same
Shana Khader	2/17/2023	1.3	Meet w/co-counsel: discuss/assign trial prep tasks, strategy; potential settlement and strategy
Shana Khader	2/21/2023	0.2	Review/respond to several emails re: Grice/Green MIL, potential motions in limine
Shana Khader Shana Khader	2/21/2023	1.6	Review/revise MIL on Grice and Green
Shana Khader	2/22/2023	0.1	Review standing order re: exhibits, proposed order
		0.1	Add supplemental research to Grice/Green MIL; draft proposed orders
Shana Khader	2/22/2023	0.4	Review standing order and local rules re: proposed order, motion format and accompanying
C1 171 1	2/22/2022	0.2	documents
Shana Khader	2/22/2023	0.2	
Shana Khader	2/22/2023	0.8	Legal research: expert opinions contrary to law or law of the case  Review draft proposed orders and prior proposed order on MSJ
Shana Khader	2/22/2023	0.1	
Shana Khader	2/22/2023	0.1	Review corr w/OC re: agreement to extend MIL response deadline
Shana Khader	2/23/2023	0.1	Corr w/A. Haac re: division of labor and next steps on expert MIL responses
Shana Khader	2/23/2023	0.1	Review pro hac motion, send to S. Scott for filing
Shana Khader	2/23/2023	0.1	Review corr w/A. McReynolds re: compiling trial exhibits
Shana Khader	2/23/2023	0.3	Review D's m to exclude Simkovic and Oliver
Shana Khader	2/24/2023	0.4	Revise list of potential motions in limine
Chana Vhadan	2/24/2022	1.2	Trial prep call w/co-counsel: discuss responses to expert motions; designation of witnesses at exhibits
Shana Khader	2/24/2023	1.2	
Shana Khader	2/24/2023	1.0	Review focus group questionnaires; select portions of video
C1 171 1	2/27/2022	0.2	
Shana Khader	2/27/2023	0.2	Review/respond to corr from S. Scott re: motions in limine, Oliver/Simkovic motion response
G1 171 1	2/2/2022	0.2	Review upcoming pretrial deadlines and assignments in preparation for trial prep meeting
Shana Khader	3/2/2023	0.2	tomorrow
Shana Khader	3/2/2023	0.2	Revise list of potential MILs per corr from S. Scott and D. Landsdowne
			Prepare for trial prep meeting review draft jury rogs, instructions; proof chart; witness list;
Shana Khader			1
SHAIM IXHAUCI	3/3/2023	1.9	gather relevant materials
Shana Khader	3/3/2023	7.4	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limi
Shana Khader Shana Khader	3/3/2023 3/3/2023	7.4 0.2	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limi Pre-meet w/HAZ re: trial prep meeting today, trial roles
Shana Khader	3/3/2023 3/3/2023 3/6/2023	7.4	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limi Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same
Shana Khader Shana Khader Shana Khader Shana Khader	3/3/2023 3/3/2023 3/6/2023 3/6/2023	7.4 0.2 1.1 0.8	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limi Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports
Shana Khader Shana Khader Shana Khader Shana Khader Shana Khader	3/3/2023 3/3/2023 3/6/2023	7.4 0.2 1.1 0.8 0.3	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limi Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports Review MIL in similar case; mult corr re: same; update our MIL list
Shana Khader Shana Khader Shana Khader Shana Khader	3/3/2023 3/3/2023 3/6/2023 3/6/2023	7.4 0.2 1.1 0.8	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limit Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports Review MIL in similar case; mult corr re: same; update our MIL list Various corr re: trial prep including locating exhibits for exhibit list
Shana Khader Shana Khader Shana Khader Shana Khader Shana Khader	3/3/2023 3/3/2023 3/6/2023 3/6/2023 3/6/2023	7.4 0.2 1.1 0.8 0.3	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limit Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports Review MIL in similar case; mult corr re: same; update our MIL list
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Shana Khader	3/3/2023 3/3/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/7/2023 3/8/2023 3/8/2023 3/9/2023 3/9/2023 3/9/2023	7.4 0.2 1.1 0.8 0.3 0.2 0.2 0.5 3.8 0.8 0.1 0.1 0.4 0.3	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limited Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports Review MIL in similar case; mult corr re: same; update our MIL list Various corr re: trial prep including locating exhibits for exhibit list Review portions of Fyock depo video in preparation for trial; corr to co-counsel re: same Review portions of Simkovic depo video in preparation for trial Revise response to motion to exclude SImkovic/Oliver, incl. add'l legal reasearch re: lawyers witnesses, testimony re: reg schemes Final read/revisions of brief in response to motion to exclude Simkovic/Oliver Final look at Oliver/Simkovic response Review local rules, judge's rules re: meet and confer, certificate of conference Corr to co-counsel re: motions in limine Review/respond to several corr amongst co-counsel re: draft jury interrogatories Review D's resp to MIL re: Grice/Green Trial prep call w/co-counsel: review/discuss exhibits, admissibility; depo designations; MILs
Shana Khader	3/3/2023 3/3/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/7/2023 3/8/2023 3/8/2023 3/9/2023 3/9/2023 3/9/2023 3/9/2023	7.4 0.2 1.1 0.8 0.3 0.2 0.2 0.5 3.8 0.8 0.1 0.1 0.4 0.3	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limit Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports Review MIL in similar case; mult corr re: same; update our MIL list Various corr re: trial prep including locating exhibits for exhibit list Review portions of Fyock depo video in preparation for trial; corr to co-counsel re: same Review portions of Simkovic depo video in preparation for trial Revise response to motion to exclude SImkovic/Oliver, incl. add'l legal reasearch re: lawyers witnesses, testimony re: reg schemes Final read/revisions of brief in response to motion to exclude Simkovic/Oliver Final look at Oliver/Simkovic response Review local rules, judge's rules re: meet and confer, certificate of conference Corr to co-counsel re: motions in limine Review/respond to several corr amongst co-counsel re: draft jury interrogatories Review D's resp to MIL re: Grice/Green Trial prep call w/co-counsel: review/discuss exhibits, admissibility; depo designations; MILs jury rogs and instructions; possible mediation
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Shana Khader	3/3/2023 3/3/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/6/2023 3/7/2023 3/8/2023 3/8/2023 3/9/2023 3/9/2023 3/9/2023 3/10/2023	7.4 0.2 1.1 0.8 0.3 0.2 0.2 0.5 3.8 0.8 0.1 0.1 0.4 0.3 2.2 0.1	Trial prep meeting: incl. order of proof, assign roles, choose exhibits, discuss motions in limi Pre-meet w/HAZ re: trial prep meeting today, trial roles Review draft opp to motion to exclude Oliver/Simkovic; corr to co-counsel re: same Review Simkovic and Oliver expert reports Review MIL in similar case; mult corr re: same; update our MIL list Various corr re: trial prep including locating exhibits for exhibit list Review portions of Fyock depo video in preparation for trial; corr to co-counsel re: same Review portions of Simkovic depo video in preparation for trial Revise response to motion to exclude SImkovic/Oliver, incl. add'l legal reasearch re: lawyers witnesses, testimony re: reg schemes Final read/revisions of brief in response to motion to exclude Simkovic/Oliver Final look at Oliver/Simkovic response Review local rules, judge's rules re: meet and confer, certificate of conference Corr to co-counsel re: motions in limine Review/respond to several corr amongst co-counsel re: draft jury interrogatories Review D's resp to MIL re: Grice/Green Trial prep call w/co-counsel: review/discuss exhibits, admissibility; depo designations; MILs jury rogs and instructions; possible mediation Corr w/C. Carlson re: Carpenter research assignment

Timekeeper	Date	Time	Description Description				
Shana Khader	3/10/2023	1.6	Draft list of proposed stips and motion in limine topics				
Shana Khader	3/13/2023	0.2	Corr to S. Scott and K. Hulick re: review of Howard depo designations				
Shana Khader	3/13/2023	0.2	Review pretrial deadlines re: exchange of exhibits, corr to J. Whittemore re: same				
Shana Khader	3/13/2023	0.1	Initial review of Ds exhibit list				
Shana Khader	3/13/2023	3.5	First pass at Howard depo designations review depo videos and transcript				
Shana Khader	3/14/2023	0.1	Review list of proposed stipulations				
Shana Khader	3/14/2023	0.1	Initial review of C. Carlson research re: video depos at trial				
Shana Khader	3/14/2023	0.1	Review draft witness list				
Shana Khader	3/14/2023	0.2	Review newly calendared agreed pretrial deadlines				
Shana Khader	3/14/2023	0.7	Review/revise updated draft of jury instructions, verdict forms				
Shana Khader	3/15/2023	0.1	Mult corr re: proposed stipulations				
Shana Khader	3/15/2023	0.2	Corr from A. Haac re: revisions to jury instructions; review comments re: same				
Shana Khader	3/15/2023	0.1	review S. Scott corr re: MILs, fixed rate APR arg				
Shana Khader	3/15/2023	0.6	Review revisions to depo designations; corr to S. Scott & K Hulick re: same				
Shana Khader	3/15/2023	0.3	Phone conf w/K. Hulick re: jury instructions and rogs				
Shana Khader	3/15/2023	0.2	Corr to HAZ, paralegals re: depo designations				
Shana Khader	3/15/2023	0.3	Corr to C. Carlson re: assignment on Mendelsohn depo designations				
Shana Khader	3/16/2023	2.9	Significant revisions/restructuring and smaller edits on jury instructions				
			Mendelsohn depo designations: compete first half; review C. Carlson's on second half; corr to				
Shana Khader	3/16/2023	1.8	Haac re: strategy questions on same				
			Revise MIL list and stips per mult corr from co-counsel; corr to team re: same; assess status o				
Shana Khader	3/16/2023	0.5	all docs required to be exchanged tomorrow				
Shana Khader	3/16/2023	0.1	Corr to J. Whittemore re: depo designations				
Shana Khader	3/17/2023	0.4	Revise and finalize MILs/Stips and Juror Rogs/Verdict forms per call with co-counsel				
			Review/respond to ACH corr re: Mendelsohn designations; revise designations; corr to broade				
Shana Khader	3/17/2023	0.7	team re: same				
Shana Khader	3/17/2023	0.9	Review portions of Howard depo video and revise designations				
Shana Khader	3/17/2023	0.2	Corr to team about status of various items due today				
Shana Khader	3/17/2023	0.2	Phone conf w/HAZ re: trial prep, status of items due, upcoming items				
			Prepare for (.3) and conduct call w/co-counsel re: trial prep review items for exchange today				
Shana Khader	3/17/2023	2.7	discuss conferrals, possible bench trial, upcoming deadlines				
Shana Khader	3/20/2023	0.3	Phone conf w/ACH re: overarching trial plan; themes; strategy				
Shana Khader	3/21/2023	0.8	Review draft of pretrial statement; corr to co-counsel re: same				
Shana Khader	3/21/2023	0.3	Review S. Scott trial themes strategy memo				
			Review notes from portion of M&C missed & various corr re: same; corr to team re:				
Shana Khader	3/22/2023	0.9	plan/strategy for handling items due Fri				
Shana Khader	3/22/2023	1.0	Meet and confer w/OC re: joint pretrial order, exhibits, witnesses				
Shana Khader	3/22/2023	0.4	Review d's pretrial statement; several corr re: same				
Shana Khader	3/22/2023	1.0	Prep call w/co-counsel re: call w/co-counsel				
Shana Khader	3/23/2023	3.3	Review D's trial exhibits; identify objections				
Shana Khader	3/23/2023	0.4	Various corr from co-counsel re: trial strategy; next steps after meet & confer				
Shana Khader	3/23/2023	1.0	Meet w/K. Hulick and C. Carlson re: objections to exhibits				
Shana Khader	3/23/2023	0.6	Draft objections to witnesses				
Shana Khader	3/24/2023	0.2	Corr to ACH re: raising disputed issues w/the court				
Shana Khader	3/24/2023	0.4	Final review, revisions on items for exchange with OC today; finalize and serve				
Shana Khader	3/24/2023	1.0	Add'l review of D's exhibits incl. legal research on objections				
Shana Khader	3/24/2023	3.0	Meet w/co-counsel re: exhibit objections, trial themes, jury instructions, other strategic issues				
Shana Khader	3/24/2023	1.0	Meet w/trial tech re: trial themes; next steps; support offered				
Shana Khader	3/24/2023	2.1	Revise exhibit objections per conference with co-counsel				
Shana Khader	3/26/2023	0.1	Corr from ACH re: amending objections				
Shana Khader	3/26/2023	0.3	Review focus group executive summary				
Shana Khader	3/26/2023	0.3	Review S. Scott strategy memo				
Shana Khader	3/27/2023	0.9	Review D's redline to draft pretrial order; draft language re: structure of trial				
Shana Khader	3/27/2023	1.6	Phone conf w/co-counsel re: joint pretrial order revisions/strategy; pretrial conference issues				
Shana Khader	3/27/2023	0.3	Review D's opp to M to Strike, corr to team re: same				
Shana Khader	3/27/2023	0.1	Corr to C. Carlson re: assigning review of foundation for exhibits in Howard/Mendelsohn dep				
Shana Khader	3/27/2023	0.1	Review A. McKinlay proposed email to court coordinator				
Shana Khader	3/27/2023	0.9	Various trial strategy correspondence from/to co-counsel				
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Timekeeper	Date	Time	Description				
Shana Khader	3/28/2023	1.2	Revise MIL list post conference w/OC; circulate to team w/comments				
Shana Khader	3/28/2023	0.4	Review joint exhibit list proposed by J. Whittemore				
Shana Khader	3/28/2023	1.5	Review/revise joint pretrial order; corr to team re: same.				
Shana Khader	3/28/2023	0.4	Various strategy corr w/co-counsel				
Shana Khader	3/28/2023	1.0	Phone conf w/K. Hulick and C. Carlson re: MIL briefing - arguments, assignments; trial brief				
Shana Khader	3/29/2023	0.7	Various strategy corr w/co-counsel, incl. corr re: joint pretrial order due today				
Shana Khader	5/1/2023	1.5	Meet w/co-counsel re: post trial-motions, TILA fee claim, appellate strategy				
Shana Khader	5/2/2023	1.1	Phone conf w/co-counsel re: issues for R. 59/50 motions, appeal, TILA fee motion				
Shana Khader	5/3/2023	0.2	Legal research: TILA actual damages				
Shana Khader	5/3/2023	0.2	Phone conf w/HAZ re: TILA actual damages				
Shana Khader	5/8/2023	0.1	Review initial draft of motion for fees on TILA claim				
Shana Khader	5/17/2023	0.3	Phone conf w/HAZ and ACH re: timing and contents of fee motion				
Shana Khader	5/18/2023	2.1	Legal research: timing and requirements of fee petition after MSJ; no judgment entered (TILA)				
Shana Khader	6/1/2023	0.3	Corr w/A. Haac, co-counsel re: resp to JNOV, TILA fee motion				
Shana Khader	6/1/2023	0.3	Review upcoming deadlines; corr to A. Haac re: strategy/division of labor on same				
Shana Khader	6/2/2023	0.1	Corr w/co-counsel re: JNOV/TILA fees				
Shana Khader	6/3/2023	0.1	Corr w/co-counsel re: JNOV/TILA fees				
Shana Khader	6/5/2023	0.2	Review C. Carlson research re: cost-shifting for TILA notice				
Shana Khader	6/5/2023	0.9	Phone conf w/co-counsel re: timing/strategy/requirements of TILA fee motion				
Shana Khader	6/5/2023	0.4	Phone conf w/ACH re: TILA fee motion, timing, contents				
Shana Khader	6/6/2023	0.1	Mult corr w/co-counsel re: TILA fee motion timing, contents				
			Legal research re: seeking fees for appellate work; effect of fee motion on time to appeal; phon				
Shana Khader	6/6/2023	0.5	conf w/ACH re: same				
Shana Khader	6/7/2023	0.1	Corr from OC re: timing of fee petition on TILA claim				
Shana Khader	6/9/2023	0.1	Corr w/co-counsel re: review of time records for TILA fees				
Shana Khader	6/9/2023	0.2	Corr to co-counsel re: review of TILA time records; criteria to use				
Shana Khader	6/9/2023	0.1	Review C. Carlson research re: fees for TILA claim; apportionment				
Shana Khader	6/11/2023	0.2	Review C. Carlson research re: TILA fees				
Shana Khader	6/12/2023	0.2	Various corr w/co-counsel re: TILA fees				
Shana Khader	6/12/2023	0.5	Review motion for fees, entry of judgment (TILA)				
Shana Khader	6/12/2023	0.5	Meet w/ACH and K. Hulick re: add'l research for TILA fee motion				
Shana Khader	6/12/2023	1.8	Legal research: for atty's fee claims (TILA fee motion)				
Shana Khader	6/12/2023	0.7	Revisions to P's M for Fees (TILA claim)				
Silana Tenadei	0/12/2023	0.7	(122.1 Cimin)				
Shana Khader	6/12/2023	0.4	Phone conf w/ACH, KCH, CC re: add'l				
Shana Khader	7/7/2023	0.1	Review ACH notes re: fee motion reply				
Shana Khader	7/8/2023	0.1	Review C. Carlson legal research on TILA fees/fee-shifting				
Shana Khader	7/11/2023	0.1	Review C. Carlson research re: finality of judgment				
Silalia Kilauci	7/11/2023	0.1	Review ACH revisions on reply brief; corr to ACH re same; corr to KH re: steps to finish brief				
Shana Khader	7/12/2023	0.5	and division of labor				
Shana Khader	7/14/2023	0.3	Corr to consulting atty L. Nako re: fee petition				
Silalia Kilauci	7/14/2023	0.1	Con to consuming any L. Nako IC. Ice pennon				
Shana Khader	7/15/2022	1.6	Detailed review of draft of reply on fee motion incl. review of legal authority and response brie				
	7/15/2023	0.1	Review revisions on fee reply; corr to ACH re: same				
Shana Khader	7/16/2023		Corr w/C. Carlson re: final revisions to brief				
Shana Khader	7/17/2023	0.1					
Shana Khader	7/17/2023	0.2	Quality control review/edits on reply on fee motion				
Shana Khader	7/17/2023	0.3	Review/respond to mult corr from co-counsel re: reply on fee motion				
Shana Khader	7/17/2023	0.7	Read/minor revisions to revised fee motion brief				
Shana Khader	8/21/2023	0.2	review/respond to corr from A. Haac re: time entries for TILA fee motion				
	10/2/2		Review order granting motion for entry of TILA judgment (.1) and related corr from co-counse				
Shana Khader	12/1/2023	0.2	(.1)				
Shana Khader	12/11/2023	0.1	Review minute entry re: briefing schedule				
Shana Khader	12/12/2023	0.1	Review draft rogs on fees and corr between co-counsel re: same				
Shana Khader	12/12/2023	0.3	Phone conf w/A. Haac and K. Hulick re: ; fee briefing (TILA)				
Shana Khader	12/12/2023	0.1	Corr to G. Wolinsky re: legal research				
Shana Khader	12/13/2023	0.1	Review research re:				
Shana Khader	12/15/2023	0.1	Review corr re: on TILA fee motion				
Shana Khader	12/18/2023	0.1	G. Wolinksy corr re: (TILA)				

Timekeeper	Date	Time	Description					
Shana Khader	12/18/2023	0.1	Review corr re: TILA					
Shana Khader	12/19/2023	0.1	Various internal corr re: , compiling and finalizing TILA fee motion					
Shana Khader	12/20/2023	0.2	Various internal corr re: TILA fee motion,					
Shana Khader	12/21/2023	1.5	Legal research re: secondary sources re: fee awards (TILA)					
Shana Khader	12/21/2023	0.1	Various internal corr re: TILA fee motion status of documents for filing, next steps					
Stephanie Ricker	7/13/2023	0.4	rinting and mailing documents.					
Sydney Teng	7/16/2015	2.3	Oraft Time and Expense Report June 15- July 14					
Sydney Teng	8/20/2015	0.3	Begin drafting time and expense report for July 15th - Aug 14th					
Sydney Teng	8/27/2015	1.1	Time up to August 15th					
Sydney Teng	9/9/2015	0.8	Format Joint ESI Disc Plan					
Sydney Teng	9/10/2015	0.5	Upload Fifth Third Production					
Sydney Teng	9/15/2015	0.4	Time Report August to Sept 14					
Sydney Teng	9/17/2015	0.4	contact clients					
Sydney Teng	9/21/2015	0.5	Send D. Lawler Complaint and Order re MTD; set up with DocuMatrix credentials					
Sydney Teng	9/24/2015	0.2	Circulate conference call-in information					
Sydney Teng	9/28/2015	0.2	Research terms and conditions of checking acct					
Sydney Teng	10/8/2015	0.2	File maintenance re settlement strategy discussion					
Sydney Teng	10/8/2015	0.5	Look into total lodestars for each firm					
Sydney Teng	10/15/2015	0.2	calendaring					
Sydney Teng	10/19/2015	0.6	Fifth Third Time for Sept and Oct					
Sydney Teng	10/20/2015	0.4	Send Aug-Oct Time and Expense Reports					
Sydney Teng	10/20/2015	0.2	Update Total Time and Expense for all firms					
Sydney Teng	10/20/2015	0.2	Draft email to counsel re time keeping					
Sydney Teng	11/12/2015	0.3	Check recent time entries; email HAZ and JK to confirm					
Sydney Teng	11/23/2015	0.6	Create and send 5/3 time					
Sydney Teng	11/23/2015	0.1	File maintenance re Mediation Meeting					
Sydney Teng	11/25/2015	0.1	Calendaring					
Sydney Teng	12/9/2015	1.1	Finalize letter to Judge Barrett					
Sydney Teng	12/11/2015	0.2	Check time entries					
Sydney Teng	12/15/2015	0.3	Compile and send time report					
Sydney Teng	12/18/2015	0.4	Change of address					
Sydney Teng	1/22/2016	0.3	Submit december time					
Sydney Teng	2/18/2016	0.3	Send Jan time					
Sydney Teng	3/14/2016	0.1	Check and assemble time entries for last period					
Sydney Teng	3/15/2016	0.2	Send time					
Sydney Teng	4/14/2016	0.2	Compile time to send					
Sydney Teng	4/18/2016	0.1	Send time report					

# EXHIBIT 3



#### Tycko & Zavareei LLP TILA Related Expense Report

Date	Description	Billa	ble Value
9/30/2023	SEPTEMBER 2023 Westlaw online research	\$	95.59
9/30/2023	SEPTEMBER 2023 Westlaw online research	\$	152.83
8/31/2023	AUGUST 2023 Westlaw online research	\$	32.16
7/31/2023	JULY 2023 Westlaw online research	\$	19.15
7/31/2023	JULY 2023 Westlaw online research	\$	490.66
	Package delivery by Fedex to Chambers of Hon. Michael		
	R. Barrett U.S. District for the S.D. Ohio Potter Stewart		
7/13/2023	U.S. Courthouse Rm 239 Cincinnati OH 45202	\$	37.48
6/30/2023	June 2023 Westlaw online research	\$	265.16
6/30/2023	June 2023 Westlaw online research	\$	8.21
3/28/2023	Messenger service from A. Reynolds to H. Zavareei	\$	239.65
	Package delivery by Fedex to Stuart E. Scott Spangenberg		
3/9/2023	Shibley & Liber LLP Cleveland OH	\$	31.00
	Package delivery by Fedex to Chambers of Hon. Judge M.		
3/8/2023	Barrett U.S. District Court Cincinnati OH	\$	38.39
3/6/2023	Video Services provided by Veritext	\$	1,228.00
3/3/2023	Video Services provided by Veritext	\$	468.00
2/28/2023	February 2023 court document retrieval from Pacer	\$	9.20
	Reimbursement of Filing Fees for Pro Hac Vice		
	Application of Shana Hope		
2/28/2023	Khader.	\$	200.00
2/28/2023	February 2023 Westlaw online research	\$	198.56
2/28/2023	February 2023 court document retrieval from Pacer	\$	22.80
2/28/2023	February 2023 Westlaw online research	\$	63.35
2/28/2023	February 2023 Westlaw online research	\$	113.65
2/28/2023	Video Services provided by Veritext	\$	278.00
	Package delivery by Fedex to Chambers of Hon. Michael		
2/23/2023	R. Barrell USDC for the Southern D. Ohio	\$	101.72
1/31/2023	January 2023 Westlaw online research	\$	160.61
1/31/2023	January 2023 Westlaw online research	\$	2.30
1/31/2023	January 2023 Westlaw online research	\$	32.12
1/31/2023	January 2023 court document retrieval from Pacer	\$	23.30
1/17/2023	Video Services provided by Veritext	\$	198.00
1/16/2023	Video Services provided by Veritext	\$	198.00
1/16/2023	Video Services provided by Veritext	\$	477.00
1/16/2023	Video Services provided by Veritext	\$	379.00
1/16/2023	Video Services provided by Veritext	\$	281.00
1/16/2023	Video Services provided by Veritext	\$	379.00

Date	Description	Billa	ble Value
1/16/2023	Video Services provided by Veritext	\$	771.00
12/31/2022	December 2022 Westlaw online research	\$	4.55
12/31/2022	Photocopies (2022)	\$	288.15
11/30/2022	November 2022 court document retrieval from Pacer	\$	21.30
11/30/2022	November 2022 Westlaw online research	\$	18.92
11/30/2022	November 2022 Westlaw online research	\$	20.98
11/3/2022	Package delivery by Fedex	\$	63.86
10/31/2022	October 2022 court document retrieval from Pacer	\$	9.10
10/31/2022	October 2022 court document retrieval from Pacer	\$	1.20
10/31/2022	October 2022 Westlaw online research	\$	333.30
10/4/2022	Package delivery by Fedex	\$	36.53
9/30/2022	3rd Quarter 2022 court document retrieval from Pacer	\$	59.80
9/30/2022	September 2022 Westlaw online research	\$	47.16
9/30/2022	September 2022 Westlaw online research	\$	136.30
9/6/2022	Package delivery by Fedex	\$	21.20
8/31/2022	August 2022 Westlaw online research	\$	8.12
8/31/2022	August 2022 Westlaw online research	\$	49.38
8/30/2022	Transcript services provided by Veritext	\$	1,195.10
8/28/2022	Transcript Services provided by Veritext	\$	3,193.04
8/22/2022	Transcript services provided by Veritext	\$	3,463.70
8/18/2022	Transcript Services provided by Veritext	\$	2,485.85
8/17/2022	Transcript Services provided by Veritext	\$	1,169.25
8/11/2022	Video Services provided by Veritext	\$	1,320.00
8/9/2022	Video Services provided by Veritext	\$	1,555.00
8/5/2022	Video Services provided by Veritext	\$	575.00
8/5/2022	Video Services provided by Veritext	\$	281.00
8/4/2022	Transcript Services provided by Veritext	\$	3,015.75
8/4/2022	Transcript services provided by Veritext	\$	1,077.80
7/31/2022	July 2022 Westlaw online research	\$	4,215.40
7/20/2022	Messenger Service from DC Office to H. Zavareei	\$	196.64
7/1/2022	July 2022 Invoice for Data Storage	\$	183.99
6/30/2022	June 2022 Westlaw online research	\$	40.72
6/30/2022	2nd Quarter 2022 court document retrieval from Pacer	\$	36.20
6/30/2022	2nd Quarter 2022 court document retrieval from Pacer	\$	12.00
6/30/2022	June 2022 Westlaw online research	\$	30.21
6/15/2022	DISCO May 2022 Invoice	\$	294.52
6/1/2022	TZ's Portion of Payment of DISCO charges for June 2022	\$	205.99
5/31/2022	May 2022 Westlaw online research	\$	101.60
5/31/2022	Messenger Service provided by Washington Express	\$	63.55
5/26/2022	Video Services provided by Veritext	\$	3,675.00
5/26/2022	Transcript Services provided by Veritext	\$	3,299.65
5/16/2022	Transcript Services provided by Veritext	\$	2,733.55

Date	Description	Billa	ble Value
5/11/2022	Transcript Services provided by Veritext	\$	2,496.95
5/11/2022	Video Services provided by Veritext	\$	2,068.00
5/11/2022	Video Services provided by Veritext	\$	1,211.00
4/30/2022	April 2022 Westlaw online research	\$	2.93
4/30/2022	April 2022 Westlaw online research	\$	59.91
4/30/2022	April 2022 Westlaw online research	\$	4.75
	Reimbursement of Co-Counsel Spangenberg Shibley &		
	Liber LLP for Court Filing		
	Fee of Motion for Admission Pro Hac Vice of Dia		
4/11/2022	Rasinariu	\$	200.00
	Dia Rasinariu: Certificate of Good standing for pro hac vice		
4/9/2022	application.	\$	25.00
4/1/2022	T&Z portion of payment of DISCO charges for April 2022	\$	249.98
4/1/2022	CS Disco March 2022 Invoice	\$	912.84
3/31/2022	LoopUp Conference Calls - March 2022	\$	3.48
3/31/2022	1st Quarter 2022 court document retrieval from Pacer	\$	57.40
3/31/2022	March 2022 Westlaw online research	\$	86.48
	T&Z 1/3 Portion of Invoice for Service of Subpoena on		
3/28/2022	Bruce Howard	\$	381.35
2/28/2022	LoopUp Conference Calls - Feb 2022	\$	37.67
2/28/2022	February 2022 Westlaw online research	\$	98.73
2/1/2022	February 2022 data storage provided by CS Disco	\$	553.50
1/31/2022	LoopUp Conference Calls - Jan 2022	\$	56.01
1/1/2022	January 2022 data storage provided by CS Disco	\$	882.70
12/31/2021	LoopUp Conference Calls in Oct 2021	\$	27.75
12/31/2021	Dec 2021 Westlaw online research	\$	15.31
12/31/2021	Dec 2021 Westlaw online research	\$	97.92
12/31/2021	Bee 2021 Westlaw omme research	Ψ	71.72
12/31/2021	4th Quarter 2021 court document retrieval from Pacer	\$	15.80
	4th Quarter 2021 court document retrieval from Pacer - H.	_	
12/31/2021	Zavareei	\$	26.10
12/31/2021	LoopUp Conference Calls in Nov 2021	\$	81.94
12/31/2021	LoopUp conference calls in Dec 2021	\$	30.98
	11/05/2021 Video deposition services provided by Veritext -		
12/20/2021	Invoice 5411942	\$	1,143.00
11/30/2021	Nov 2021 Westlaw online research	\$	20.33
10/31/2021	Oct 2021 Westlaw online research	\$	103.48
10/28/2021	LoopUp conference calls in Aug 2021	\$	24.67
10/1/2021	Sep 2021 Westlaw online research	\$	106.28

Date	Description	Billab	e Value
9/30/2021	3rd Quarter 2021 Pacer court document retrieval	\$	17.60
9/30/2021	3rd Quarter 2021 court document retrieval from Pacer - A.	Ψ	17.00
9/30/2021	Gold	\$	6.50
9/16/2021	Pacer Document retrieval	\$	3.00
9/16/2021	Pacer Document Retrieval	\$	15.60
8/31/2021	Aug 2021 Westlaw online research	\$	87.11
8/27/2021	Epiq Class Certification Notice Costs	<del></del>	03,541.00
0/2//2021	Epiq class certification (votice costs	Ψ1	3,5 11.00
8/2/2021	Conference calls during the month of May 2021	\$	9.12
7/31/2021	July 2021 Westlaw online research	\$	45.63
6/30/2021	April 2021 Westlaw online research	\$	49.49
5/31/2021	May 2021 Westlaw online research	\$	206.85
4/30/2021	Apr 2021 Westlaw online research	\$	11.24
4/30/2021	Apr 2021 Westlaw online research	\$	197.19
4/28/2021	Conference calls during the month of February 2021	\$	6.67
3/31/2021	Mar 2021 Westlaw online research	\$	156.15
3/31/2021	1st Quarter 2021 court document retrieval from Pacer	\$	14.90
3/1/2021	Conference calls in Dec 2020	\$	16.50
3/1/2021	Court document retrieval from Pacer in 4th Quarter 2020	\$	0.40
2/28/2021	Feb 2021 Westlaw online research	\$	9.79
2/16/2021	Conference calls during November 2020	\$	3.57
1/1/2021	Westlaw online research in December 2020	\$	52.70
12/30/2020	Conference calls during the month of Oct 2020	\$	25.96
12/1/2020	Westaw Online Legal Research during Nov 2020	\$	18.49
11/30/2020	Conference calls in September 2020	\$	48.48
11/30/2020	Conference cans in September 2020	<b>D</b>	40.40
11/30/2020	Court document retrieval during the 3rd quarter 2020	\$	86.40
11/1/2020	W	Φ.	22.42
11/1/2020	Westaw online legal research in October 2020	\$	23.42
10/30/2020	Conference calls during the month of Aug 2020	\$	15.89
10/1/2020	Sep 2020 Westlaw Online Legal Research	\$	30.49
9/1/2020	Aug 2020 Westlaw online research	\$	462.63
8/31/2020	Conference calls in Jun 2020	\$	12.70
8/31/2020	PACER 2nd quarter court document retrieval	\$	13.40
8/31/2020	PACER 2nd quarter court document retrieval	\$	49.40
8/1/2020	Westaw Online Legal Research in July 2020	\$	90.75

Date	Description	Billal	ble Value
7/27/2020	United airlines to Chicago on 8/10/20	\$	353.70
6/26/2020	Conference calls in April 2020	\$	31.37
6/1/2020	Westlaw online research during May 2020	\$	13.31
5/29/2020	Conference calls in March 2020	\$	10.04
5/29/2020	Court document retrieval from Pacer	\$	0.80
5/1/2020	Westlaw online research in April 2020	\$	399.52
4/28/2020	Conference calls during Feb 2020	\$	17.60
4/28/2020	Conference calls during Feb 2020	\$	1.54
4/1/2020	Westlaw online research in Mar 2020	\$	10.10
3/31/2020	Photocopies	\$	91.95
3/26/2020	The Alida Hotel in Savannah on 2/25/20	\$	388.94
3/26/2020	Exclusive taxi in Savanna on 2/24/20	\$	40.00
3/26/2020	Uber cabs (2) on 2/24/20	\$	110.49
3/26/2020	Uber cab on 2/23/02	\$	52.72
3/26/2020	United airlines to Savannah on 2/19/20	\$	1,653.79
3/26/2020	21C Museum Cincinnati Hotel on 2/21/20	\$	273.89
3/26/2020	Southwest airlines on 2/19/20	\$	165.98
		+	
3/26/2020	Conference calls during the month of Dec 2019	\$	72.74
	6	+-	
3/26/2020	Conference calls during the month of Jan 2020	\$	17.34
	Deposition transcript provided by Veritext invoice		
3/9/2020	MW4238502	\$	658.65
3/2/2020	Photocopies	\$	15.00
2/26/2020	Pacer court document retrieval during 4th quarter 2019	\$	114.40
2/26/2020	Bohemian Hotel in Savannah on 1/20/20	\$	580.80
2/26/2020	Uber cabs (2) on 1/20/20	\$	128.19
2/26/2020	Uber cabs (2) on 1/19/20	\$	42.44
2/26/2020	Uber cabs (3) on 1/18/20	\$	209.09
	Depo prep meeting room at Bohemian Hotel in Savannah		
2/26/2020	on 1/21/20	\$	663.40
1/31/2020	Photocopies	\$	67.80
1/29/2020	Cab home from airport on 1/16/20	\$	65.00
1/29/2020	The Harrington Inn & Spa in Geneva on 1/15/20	\$	380.79
1/29/2020	Gogo inflight wi-fi on 1/14/20	\$	8.99
1/29/2020	Uber caabs (2) on 1/14/20	\$	71.40
1/29/2020	United airlines on 1/13/20	\$	1,050.80
1/29/2020	Bohemian Hotel in Savannah on 1/7/20	\$	551.92
1/9/2020	Postage	\$	3.25
-		+	
1/1/2020	Westlaw online research during December 2019	\$	13.46

Date	Description	Billable	· Value
12/1/2010	Westlers coling assessed during Neverther 2010	d.	20.27
12/1/2019	Westlaw online research during November 2019	\$	28.27
12/1/2019	Westlaw online research during November 2019	\$	28.27
12/1/2019	Westiaw offinite research during November 2019	Ф	20.27
11/25/2019	Court document retrieval from Pacer 3rd quarter 2019	\$	40.90
10/24/2019	Conference calls in August 2019	\$	9.56
10/24/2019	Conference calls in September 2019	\$	8.22
9/24/2019	Certificate of good standingon 8/26/19		25.00
9/4/2019	Pro hac vice admissions fee reimbursement	\$	200.00
8/28/2019	Court document retrieval from Pacer	\$	144.00
7/11/2019	Postage	\$	4.55
5/29/2019	Court document retrieval from Pacer 1st quarter 2019	\$	32.30
2/25/2019	Court document retreival from Pacer	\$	34.20
1/31/2019	Postage 120 @ 0.15	\$	18.00
1/29/2019	Conference call on 12/17/18 at 1 pm	\$	6.60
	Court document retrieval from Pacer during the 3rd quarter		
11/28/2018	2018	\$	31.00
8/29/2018	Court document retrieval 2nd quarter 2018	\$	3.00
	Westlaw online legal research during the month of July		
8/1/2018	2018	\$	8.56
7/20/2018	Photocopies 54 @ 0.15	\$	8.10
5/31/2018	Photocopies 1 @ 0.15	\$	0.15
	Westlaw online legal research during the month of February		
3/1/2018	2018	\$	90.61
2/27/2018	Uber rides (2) on 2/12/18	\$	77.11
2/27/2018	United airlines ticket on 2/12/18	\$	706.60
2/27/2018	Travel expense at Ritz-Carlton in Cleveland on 2/13/18	\$	57.52
1/29/2018	Conference call on 12/13/17 at 8 am	\$	3.06
1/29/2018	Conference call on 12/19/17 at 1 pm	\$	2.55
12/31/2017	Photocopies 315 @ 0.15	\$	47.25
11/29/2017	Westin Cincinnati on 11/4/17	\$	367.33
11/29/2017	Taxi on 11/9/17	\$	7.78
11/29/2017	Airport parking on 11/9/17	\$	34.00
11/29/2017	Cab to meeting on 11/8/17	\$	12.90
11/29/2017	Uber cabs (3) on 11/9/17	\$	70.90
6/28/2017	Photocopies 24 @ 0.15	\$	3.60
4/30/2017	Mar and April 2017 Photocopies 7 @ 0.15	\$	1.05
3/20/2017	Postage	\$	1.38
3/1/2017	during the month of February 2017	\$	16.46
2/28/2017	Photocopies 216 @ 0.15	\$	32.40

Date	Description	Billab	le Value
2/17/2017	Conference call on 1/11/17 at 9:30 am	\$	2.82
2/17/2017	Conference call on 1/6/17 at 1 pm	\$	1.65
	Westlaw online legal research during the month of Jan		
2/1/2017	2017	\$	11.62
1/18/2017	Conference call on 12/22/16 at 4:30 pm	\$	4.02
12/30/2016	Conference call on 11/30/16 at 3:30 pm	\$	3.45
11/22/2016	Conference call on 10/12/16 at 3 pm	\$	15.12
10/31/2016	Photocopies 195 @ 0.15	\$	29.25
9/20/2016	Conference call on 9/26/16 at Noon	\$	4.68
	Court document retrival through Pacer 4th quarter 2015		
1/29/2016	invoice	\$	8.10
12/18/2015	Conference call on 11/4/15 at 12:30 pm	\$	6.96
11/18/2015	Photocopies 17 @ 0.15	\$	2.55
10/16/2015	Conference call on 9/25/15 at 10:30 am	\$	2.55
8/17/2015	Photocopies 4 @ 0.15	\$	0.60
8/17/2015	Conference call on 7/23/15 at 2 pm	\$	7.08
7/20/2015	Photocopies 70 @ 0.15	\$	10.50
	Court document retreival from Pacer 2nd Quarter invoice		
7/7/2015	Q22015	\$	1.90
5/1/2015	Westlaw online research in April 2015	\$	4.70
4/17/2015	Photocopying 102 @ 0.15	\$	15.30
4/6/2015	Court document retreival from 1st quarter PACER Service	\$	1.80
3/31/2014	Photocopies 36 @ 0.15	\$	5.40
2/27/2014	Photocopies 7 @ 0.15	\$	1.05
1/29/2014	Photocopies 316 @ 0.15	\$	47.40
1/3/2014	on 12/19/14 at 3 pm	\$	2.78
12/31/2013	Photocopies 176 @ 0.15	\$	26.40
12/2/2013	Photocopies 3 @ 0.15	\$	0.45
11/1/2013	Photocopies 108 @ 0.15	\$	16.20
10/3/2013	on 10/2/13 at 2 pm	\$	4.26
9/30/2013	Photocopies 411 @ 0.15	\$	61.65
9/3/2013	Conference Call on 8/16/13 at 1 p.m.	\$	1.26
8/29/2013	Photocopies 289 @ 0.15	\$	43.35
8/3/2013	on 7/16/13 at 10:15 am	\$	0.63
8/3/2013	on 7/18/13 at 1:30 pm	\$	3.06
8/3/2013	on 7/19/13 at 10 am	\$	2.74
7/29/2013	Photocopies 228 @ 0.15	\$	34.20
7/17/2013	Delta Airlines from Cincinnati on 7/9/13	\$	443.90
7/17/2013	Parking in Cincinnati on 7/12/13	\$	2.00
7/17/2013	US Airways to Cincinnati on 7/8/13	\$	429.90
7/17/2013	Parking at airport on 7/12/13	\$	22.00
7/17/2013	Budget RAC in Kentucky on 7/12/13	\$	50.84

Date	Description	Billabl	le Value
7/17/2013	Parking at airport on 7/11/13	\$	46.00
6/28/2013	Photocopies 68 @ 0.15	\$	10.20
6/3/2013	Conference Call May 21 at 10:30 am	\$	6.02
5/31/2013	Photocopies 118 @ 0.15	\$	17.70
5/16/2013	on 5/2/13	\$	22.09
5/1/2013	Photocopies 438 @ 0.15	\$	65.70
4/30/2013	Postage	\$	6.96
4/9/2013	Postage	\$	0.46
3/29/2013	Photocopies 82 @ 0.15	\$	12.30
3/28/2013	Postage	\$	1.38
3/20/2013	Refund of seats on cancelled flights	\$	(108.00)
3/20/2013	Refund of cancelled flight	\$	(178.90)
3/20/2013	SWAir to Chicago (cancelled)	\$	178.90
2/28/2013	Photocopies 407 @ 0.15	\$	61.05
2/20/2013	United Airlines to Chicago on 2/8/13	\$	144.80
2/20/2013	United Airlines extra charges	\$	108.00
1/30/2013	Photocopies 217 @ 0.15	\$	32.55
1/3/2013	from PACER service	\$	3.70
12/31/2012	Photocopies 262 @ 0.15	\$	39.30
11/28/2012	Photocopies 81 @ 0.15	\$	12.15
11/14/2012	Postage	\$	0.90
10/31/2012	Photocopies 194 @ 0.15	\$	29.10
9/30/2012	Photocopies 166 @ 0.15	\$	24.90
8/29/2012	Photocopies 97 @ 0.15	\$	14.55
	Video deposition services provided by Veritext invoice		
3/12/2000	MW4240607	\$	222.50
	TOTAL:	\$ 26	51,549.32

## EXHIBIT 4

- COMMITMENT. INTEGRITY. RESULTS.

PETER H. WEINBERGER, OF COUNSEL WILLIAM HAWAL OF COUNSEL PETER J. BRODHEAD, OF COUNSEL DENNIS R. LANSDOWNE STUART E. SCOTT NICHOLAS A. DICELLO JEREMY A. TOR, LICENSED IN NY, OH DUSTIN B. HERMAN MICHAEL P. LEWIS, LICENSED IN CA, OH KEVIN C. HULICK

CRAIG SPANGENBERG (1914-1998)

NORMAN W. SHIBLEY

JOHN D. LIBER (1938-2013)

(1921-1992)

#### **FIRM RESUME**

Spangenberg Shibley & Liber LLP was established in 1946 by founding partner Craig Spangenberg. Craig and the firm initially became involved in the litigation against big pharma in the 1960s when Craig led a group of lawyers who represented children born with severe deformities caused by their mother's ingestion of thalidomide. Since that time the firm has been involved in leadership roles in multidistrict litigation cases involving the drug, Albuterol, the drug, Benicar, and the MRI dye known as gadolinium-based contrast agents. The firm is currently the Plaintiff's liaison counsel firm in the largest pharmaceutical litigation in U.S. history, MDL 2804 *In Re: National Prescription Opiate Litigation*, No. 1:17-md-2804 (N.D.Ohio), where the firm served as trial counsel in the first bellwether trial of the MDL.

The firm has a long and successful history of trial litigation in personal injury, medical negligence, wrongful death, and business disputes, with over 200 cases settled or tried in excess of \$1 million. Within the past two years, the firm has secured trial verdicts of \$17 million for the wrongful death of a 54-year-old road construction worker, \$6 million for the wrongful death of a 68 year-old woman who was improperly discharged from the hospital, a \$6.5 million verdict for the wrongful death of a 52-year-old-woman who was improperly discharged from the hospital twice in the same day, and \$5.7 million for the wrongful death of a man who died as a result of car crash.

Recently, the firm has also developed a first-rate civil rights practice. Indeed, in recent years, Spangenberg Shibley & Liber has achieved numerous settlements for individuals who were the victims of excessive force from law enforcement officers. Perhaps most notably, the firm achieved a \$17.5 million for a young man rendered a quadriplegic as a result of the use of excessive force by correctional officers. As part of its civil right litigation practice, the firm has developed extensive experience in successfully arguing appeals before the Sixth Circuit Court of Appeals.

In the past 10 years, the firm has been involved in myriad consumer class action litigation including the following successful class settlements:

- Jacobs v. FirstMerit Corp., Case No. 11 CV 000090 (Lake C.P.) (settlement of \$15,975,000 in cash and debt relief to customers improperly charged overdraft fees);
- Brandewie v. Wal-Mart Stores, Inc., Case No. 14-cv-965 (N.D.Ohio) (\$5 million settlement for customers overcharged sales tax wrongfully retained by Wal-Mart);
- Smith v. Fifth Third Bank, Case No. 1:18-cv-464 (S.D.Ohio) (settlement of \$5.2 million for customers improperly charged multiple ATM fees);

- Ostendorf v. Grange Indemnify Insurance Company, Case No. 2:19-cv-1147 (S.D.Ohio) (settlement fund of \$12,667,804 for insurance customers improperly deprived of credit for sales tax, title, transfer, and service fees on total loss vehicles);
- Cavallaro v. United States Automobile Association, Case No. 1:20-cv-414 (S.D.Ohio) (settlement fund of \$10,250,000 for insurance customers improperly deprived of credit for sales tax, title, transfer, and service fees for total loss vehicles);
- Middleton v. Liberty Mutual Personal Insurance Company, No. 1:20-cv-668 (S.D.Ohio) (settlement fund of \$14.4 million for insurance customers improperly deprived of credit for sales tax for total loss vehicles);
- Romaniak v. Esurance Property and Casualty Insurance Company, Case No. 1:20-cv-2773 (N.D.Ohio) (settlement fund of \$3.14 million for insurance customers improperly deprived of credit for sales tax for total loss vehicles);
- Hindes v. Ohio Mutual Insurance Company, Case No. 20 CV 7627 (Franklin C.P.) (settlement fund of \$1.875 million for insurance customers improperly deprived of credit for tax for total loss vehicles); and
- Meta vs. Target Corporation., Case No. 4:14-CV-0832 (N.D.Ohio) (settlement for customers sold defective flushable wipes of either Target gift cards with value of up to \$27 per class member without proof of purchase or a coupon reformulated version of product for each unit of product purchased during class period).
- Petitt v. The Proctor & Gamble Company, Case No. 3:15-cv-2150 (N.D.Cal.) (settlement for customers sold defective flushable wipes of up to \$30 per household)

In addition to its class action work, Spangenberg Shibley & Liber has recently served in leadership positions in the following complex litigation:

- In Re: National Prescription Opiate Litigation, No. 1:17-md-2804 (N.D.Ohio) (Plaintiffs' liaison counsel)
- In re Gadolinium Contrast Dyes Products Liability Litigation, 1:08-gd-5000 (N.D.Ohio) (Plaintiffs' liaison counsel);
- In re: Benicar (Olmesartan) Products Liability Litigation, No. 1:15-md-2606 (D.N.J.) (Plaintiffs" Executive Committee); and
- Holladay v. The Islamic Republic of Iran, No. 1:17-cv-915 (D.D.C.); Williams v. The Islamic Republic of Iran, No. 1:18-cv-2425 (D.D.C.); Fishbeck v. The Islamic Republic of Iran, No. 1:18-cv-2248 (D.D.C.); and Hartwick v. The Islamic Republic of Iran, No. 1:18-cv-1612 (D.D.C.) (part of Plaintiff leadership in lawsuits representing veterans and Gold Star Families against foreign state actors under Anti-Terrorism Act).

#### PETER H. WEINBERGER, Of Counsel



Peter H. Weinberger has successfully handled a wide variety of complex injury and wrongful death cases caused by medical malpractice, defective products, and motor vehicle accidents. In the medical malpractice field, he has tried and settled cases that have involved failures to timely diagnose diseases, failed surgeries, and birth injuries. In the field of defective products, he has concluded cases involving industrial plant explosions, defective insulation

products, dangerous drugs and defective machinery. Some of the complex motor vehicle cases have included collisions involving overloaded trucks, tractor-trailer collisions, and railroad crossing cases. Peter is experienced in counseling clients who

have suffered catastrophic injuries requiring lifetime medical care and in evaluating and presenting the economic and noneconomic losses associated with a wrongful death.

Mr. Weinberger has been appointed as Plaintiff's co-liaison counsel in the National Prescription Opiate Multidistrict Litigation case in the Northern District of Ohio Federal Court representing cities, counties, hospital groups and third-party payers against the manufacturers and distributors of opiate medications such as OxyContin and fentanyl. Peter has also served as a member of the Plaintiff's Steering Committee in several cases centralized in Multi-District Litigation including in re Teflon and in re Gadolinium and was a member of the Plaintiff's Executive Committee in the Olmesartan (Benicar) MDL.



- Cleveland, OH

Mr. Weinberger has also been consistently selected as a "Super Lawyer" on Ohio Super Lawyers magazine's list, including being placed in the Top 10 Ohio and Top 5 Cleveland lists for 2018. Peter's votes are among the highest received in the Super Lawyers nomination process each year. Peter was voted by Best Lawyers in America® as Best Lawyers, Lawyer of the Year in Personal Injury Litigation – Plaintiffs for 2013 and as Lawyer of the Year in Medical Malpractice Law – Plaintiffs in 2012.

He has been recognized as a Local Litigation Star – Plaintiff in the 2016 edition of Benchmark Litigation, a publication focusing on leading trial attorneys and firms in the United States. This was the fourth consecutive year that Mr. Weinberger has been selected as a Local Litigation Star by Benchmark Litigation. The publication's rankings are the

Peter H. Weinberger

Best Lawyers

Lawver of the Year

result of extensive interviews with private practice lawyers and in-house counsel. The guide's "local litigation stars" reflects lawyers who are recommended by peers and clients to have established consistent reputations as trial attorneys. Peter also has been selected by The National Trial Lawyers Association (a professional, educational, and business organization of trial attorneys) as one of the Top 100 Trial Lawyers in Ohio.

Personal Injury Litigation Peter is a Fellow in the American College of Trial Lawyers, a Fellow in the International Society of Cleveland Barristers, an advocate of the American Board of Trial Advocates, a sustaining member of the American Association for Justice, and has received distinguished service awards from the Cleveland Academy of Trial Attorneys and the Cuyahoga County Bar Association. He is a past president of the Cleveland Metropolitan Bar Association (formerly the Cuyahoga County Bar Association) and the Cleveland Academy of Trial Attorneys.

Of note is Peter's involvement in a number of cases that have impacted the personal injury law in the state of Ohio. Among his most important cases is the case of Galayda v. Lake Hospital Systems, which struck down as unconstitutional a provision of the 1987 Tort Reform Law which attempted to set a limit on personal injury damages. In 2003 and 2004, as Legislative Chair of the Ohio Association for Justice, formerly the Ohio Academy of Trial Lawyers, he led the fight against tort reform in the Ohio Legislature. For his efforts, he received the president's award from the Ohio Association for Justice and the Spangenberg Award (named in honor of the founding partner of this law firm) from the Cleveland Academy of Trial Attorneys.

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### SPANGENBERC Shibley & Liber

TRIAL LAWYERS

#### WILLIAM HAWAL, Of Counsel



William Hawal has been consistently recognized as being among The Best Lawyers in America® in the Medical Malpractice Law and Personal Injury practice areas. For more than 25 years, it has assisted lawyers and clients looking for legal counsel in unfamiliar specialties and in foreign jurisdictions. Best Lawyers named Bill its 2015 Lawyer of the Year for medical malpractice for the northeast Ohio area and Ohio Lawyer of the Year for 2020. Bill was also named to Best Lawyers 2021 for medical malpractice and personal injury. In 2013, Bill was inducted as a Fellow of the American College of Trial Lawyers, whose membership is restricted to the top one percent of trial lawyers from each state, as unanimously recognized by their

peers. William Hawal also has been selected by The American Trial Lawyers Association (a professional, educational, and business organization of trial attorneys) as one of the Top 100 Trial Lawyers in Ohio.



Medical Malpractice Law - Plaintiffs
Cleveland, Ohio
Of today's

Bill is the former President of the American Board of Trial Advocates (ABOTA) Ohio Chapter. He is a past President of The Cleveland Academy of Trial Lawyers, a recipient of a distinguished service award from The Ohio Association for Justice, a member of the Executive Board of the Ohio Chapter of the American Board of Trial Advocates, and has been appointed a life member of the Eighth District Judicial Conference. Bill has been invited to be a founding member of The Summit Counsel, a group of today's top civil justice lawyers in the United States and has been granted a Fellowship in the

International Society of Barristers. Bill is also the Ohio attorney representative to the National Center for State Courts.

handling birth injury cases, emphasizing mainly on babies born with cerebral palsy due to oxygen

Bill is involved in litigating a wide variety of complex matters involving medical misdiagnoses, medical procedures, defective medical devices and drugs, civil rights, legal malpractice, and injuries due to defective industrial and consumer products. Because of his extensive knowledge on product liability litigation, he has successfully tried and settled cases involving defective helicopter components, automobiles, farm equipment, industrial machines, and other products. In addition, he has also had a central role in the Gadolinium-Based Contrast Litigation, the Federal Multidistrict Litigation responsible for conducting much of the discovery for the more than 600 cases brought against GE Healthcare Inc. As part of that work, Bill was involved in the first Gadolinium trial tried before Judge Polster. Most recently, Bill is involved in litigating the lawsuits against the Opioid distributions in the consolidated MDL. Lastly, Bill has extensive experience in

deprivation around the time of delivery. Overall, Bill has successfully tried and settled numerous cases on behalf of families with severely disabled children.



By way of example, Bill achieved a \$5.6 million medical malpractice verdict obtained on behalf of a client who was paralyzed from a misdiagnosed spinal abscess caused by MRSA. He also reached an \$8,500,000 medical malpractice settlement for a delay in evaluating a spinal hematoma resulting in quadriplegia.

Bill is a 1980 *cum laude* graduate from the Cleveland-Marshall College of Law, where he served on the law review. He is a 1976 graduate of Ohio University.

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#### PETER J. BRODHEAD, Of Counsel



Following a judicial clerkship, Peter Brodhead joined Spangenberg Shibley & Liber in 1980. "I have had the privilege at Spangenberg of learning from and working with some of the finest trial lawyers in this area. After thirty years here, I still feel that there is no finer group of attorneys that work so skillfully and diligently on behalf of their clients and their causes."



Over the span of three decades, Peter has handled a broad range of cases involving both traumatic injury as well as disease and illness due to toxic exposure from harmful chemicals and, in some instances, unsafe pharmaceutical products. Such matters have

included asbestos exposure resulting in asbestosis, lung cancer, and mesothelioma, fatal cancers resulting from substances such as benzene and vinyl chloride monomer fumes, respiratory disease due to metalworking fluid overexposure, and serious lung complications arising from asthma medication contaminated with harmful and potentially fatal bacteria.



Peter served as Plaintiffs' Liaison Counsel in the Federal Multidistrict Litigation 1909: In Re: Gadolinium-based Contrast Agent Product Liability Litigation. This litigation involved the MRI contrast agent Omniscan, which contains a highly toxic heavy metal called gadolinium. Scientists and doctors have determined that Omniscan causes Nephrogenic Systemic Fibrosis, a chronic, progressive, incurable and sometimes fatal condition. As part of the firm's representation, Peter and the firm tried the first trial in the MDL, earning a \$5 million verdict.

In addition to his representation of clients in these areas, Peter has also actively litigated cases in several civil rights matters primarily involving the unconstitutional use of excessive force. In recent years, Peter has also handled matters involving patent infringement as well as representation of clients who have been denied insurance coverage. Peter also represents victims of catastrophic injuries arising from vehicular and trucking collisions, as well as defective machinery and other products.

Peter is also a tireless advocate in the community. He is a frequent donor of platelets and plasma at



the American Red Cross. He serves as a trustee for North Coast Community Homes, the Cleveland Institute of Music, and the Little Sisters of the Poor. In 2010, Peter and his wife Ellen's commitment to the North Coast Community Homes earned them the organization's Philanthropy Award.

Peter and Ellen have four sons. Peter is a talented musician, performing in the adult choir of St. Francis of Assisi and playing keyboard for a band composed of attorneys and judges.

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TRIAL LAWYERS

#### **DENNIS R. LANSDOWNE, Partner**



Dennis R. Lansdowne has been with the Spangenberg firm since 1985 and has been a partner since 1990. During that time, he has represented individuals in catastrophic injury and wrongful death cases as well as large corporations. "My background and training have allowed me to pursue cases for both people and businesses that have suffered harm. It is an interesting and exciting practice."

Dennis graduated *summa cum laude* from Cleveland Marshall College of Law, where he was a member of the Law Review. Following graduation, he served as a law clerk to the

Honorable Robert B. Krupansky at both the Northern District of Ohio and the Sixth Circuit Court of Appeals. "Working in both the trial and appellate courts gave me a unique opportunity to see the litigation process and I was fortunate to observe many fine lawyers from Ohio and other parts of the country. I knew I wanted to devote myself to that process and practice at the highest level."



In recent years, Dennis has emphasized imparting all of the wisdom he has learned over an almost forty-year career to young attorneys. In August of 2021, Dennis served as a coach at the National Trial Lawyers 40 under 40 Trial Academy Bootcamp in Florida. In January and February of 2022, Dennis participated in a three-part lecture series for the Trial School called "The Spangenberg Lectures," where he and other Spangenberg partners used lessons and historical footage of firm founder Craig Spangenberg. Dennis was then invited back to Trial School in June of 2022 to deliver a presentation entitled "Lessons Learned from a

\$6.5 Million Verdict in a Medical Malpractice Case."

Dennis has remained involved with Cleveland Marshall College of Law and is a past president of the alumni association and a current member of the school's advisory council for the health law and policy center. He has had the distinguished honor of being the recipient of the 2013 Alumnus of the Year for his outstanding professional achievement, leadership, and service to the community. In 2018, Dennis was inducted into the law school's Hall of Fame.

# Dennis R. Lansdowne Best Lawyers Lawyer of the Year 2020 Personal Injury Litigation - Plaintiffs Cleveland, Ohio

Dennis R. Lansdowne

**Best Lawyers** 

Lawver of the Year

Medical Malpractice Law - Plaintiffs

- Cleveland, OH

#### Some of Dennis's Case Results Include:

- \$6.5 million medical malpractice verdict for the family of a woman discharged from the emergency room who died the following day from pneumonia.
- \$5.7 million verdict for the family of a man who was killed in a car/truck collision.
- \$8.2 million verdict for a man who spent 10 hours in the emergency room before it was recognized that he had spinal cord compression. This delay resulted in the man become a permanent paraplegic.
- \$5 million settlement for consumers who did not receive full refunds from a national retailer.
- \$8 million settlement for a man whose leg was mangled when a bollard in a roundabout shattered when hit by a vehicle and pieces of the defective bollard struck the man's leg.
- \$17.5 million settlement in a legal malpractice mater for a man whose estate plan was negligently administered.
- \$3.5 million settlement for a young woman attacked by her boyfriend at a fraternity party. The young woman developed arteriovenous fistula and was rendered an incomplete quadriplegic.

Dennis and his wife, Kim, have four children. They are members of the St. Colman parish on Cleveland's near west side.

TRIAL LAWYERS

#### STUART E. SCOTT, Partner



Stuart Scott has been a lawyer with Spangenberg since his graduation from law school in 1995 and became a partner in 2005.

Stuart leads the firm's class action practice, where he has served as class counsel in numerous cases. Of note, Stuart has achieved multiple settlements in lawsuits against banks for charging excessive fees. He has also earned settlements in courts throughout Ohio related insurance companies improperly failing to credit the insureds for sales tax on their total loss vehicles. He has also attained settlements in the consumer products space, including for the sale of defective flushable wipes.

Stuart is also one of the rare plaintiff's class action lawyers who has actually taken a class action to trial. In a trial in 2023 in the Southern District of Ohio, Stuart conducted voir dire, delivered the opening statement, and cross examined the defendant bank's key witness in a class action trial.

As a result of his class action work, Stuart earned the honor of receiving the 2024 Best Lawyers Lawyer of the Year Award for Mass Tort Litigation / Class Actions – Plaintiffs. He has also been recognized annually by Super Lawyers since 2010.

Outside of the class action space, Stuart is a well accomplished trial lawyer, trying almost 30 cases to verdict. For instance, he achieved a \$5.6 million verdict for a man who became paraplegic as the result of a hospital's failure to timely diagnoses a spinal epidural abscess. He also worked on lawsuits related to Vioxx, achieving over \$5 million in settlements for his

Best Lawyers

LAWYER

OF THE YEAR

STUART E. SCOTT

MASS TORT LITIGATION / CLASS
ACTIONS - PLAINTIFFS

CLEVELAND
2024

clients. Stuart also won a \$28 million verdict for the family of a 43-year-old senior lineman of an energy company who died as a result of a defective pole. Stuart also won a \$4.4 million dollar verdict against a nursing home for the family of a 74-year-old woman who died as a result of a fall. The jury's verdict included a \$3 million punitive damages award. Stuart also achieved a pre-suit settlement for the death of a 68-year-old woman who died in the hospital from a heart attack after one of her telemetry leads fell off and the alert for that was ignored.

Stuart has attained successful results in medical malpractice, personal injury, product liability, breach of contract, and legal malpractice cases.

Stuart is a member of the Ohio Association for Justice and the Cleveland Academy of Trial Attorneys, having served on the boards of directors for both organizations.

Stuart grew up in Columbus, Ohio. He attended Ball State University for his undergraduate education, where he was a pitcher on the school's baseball team. After a stint as a minor league baseball player, Stuart attended and graduated from the Ohio State University Mortiz College of Law Order of the Coif. In his time playing baseball, Stuart attained the illustrious achievement of striking out Ken Griffey Jr.

Outside of work, Stuart is an avid tennis player, competing in USTA competition.

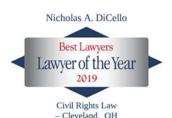
Stuart lives in Bratenhal, Ohio with his wife.

#### **NICHOLAS A. DICELLO, Partner**



Nick came to Spangenberg Shibley & Liber LLP in 2004 after serving as a law clerk for the late Honorable John M. Manos, Senior Judge for the Federal District Court for the Northern District of Ohio after graduating *magna cum laude* from the Cleveland Marshall College of Law in 2002. Nick learned much from his mentor: "During my two years with Judge Manos, I had the opportunity to observe trial lawyers from Ohio and all over the country. I set my sights high and was fortunate to be given the opportunity to practice at one of Ohio's most well-respected firms." Nick has been selected as one of the National Trial Lawyers Association's "Top 40 under 40 Trial Lawyers." He joined the Judge John M. Manos Inn of Court in 2012.

Nick has dedicated his career to seeking justice for people who have been injured or harmed by another's careless or reckless misconduct. He focuses his practice on representing victims of medical malpractice and other types of professional misconduct, including accounting malpractice, claims against insurance companies and insurance agents, and law enforcement misconduct.



In particular, Nick has led the firm's civil rights practice and developed it into one of the preeminent civil rights practices in the Sixth Circuit. Indeed, the firm regularly successfully defends appeals of trial court decisions deriving qualified immunity to police efficient for the use of executive force.

trial court decisions denying qualified immunity to police officers for the use of excessive force. In this practice, Nick has achieved numerous successful settlements on behalf of his clients. Nick also has the honor of having received Best Lawyers Lawyer of the Year of award for civil rights twice in three years.

#### Some of Nick's Case Results Include:

- A \$17.5 million dollar settlement on behalf of a young man senselessly beaten by corrections officers rendering the young man a quadriplegic.
- A \$6 million dollar verdict on behalf of the estate of a woman who was improperly discharged from the hospital.
- A \$3.97 million medical malpractice verdict for injuries sustained during a typically routine biopsy procedure.
- A \$2.1 million verdict on behalf of five children whose parents were killed by a driver who lost control of his car and struck them head-on.
- A significant settlement on behalf of a widow whose husband died of a heart attack when his doctor temporarily discontinued his heart medication without first consulting with the prescribing cardiologist.
- A \$1.65 million settlement for a woman whose health insurance was cancelled after being diagnosed with a lifethreatening medical condition.
- Representation of the widow of a 62-year-old man who was restrained and pepper-sprayed to death while being detained for misdemeanor trespassing in Florida.

 A seven-figure settlement on behalf of a group of creditors who were deceived into extending credit to a mutual customer based on false and misleading information communicated to them by a bank.

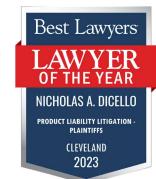




Prior to his career as an attorney, Nick was a goalkeeper on the Cleveland Crunch Indoor Soccer team. He was a member of the team when it won the 1998 NPSL Championship. During his college

career at Lehigh University, Nick was an Academic All American.

Nick lives in Chesterland, Ohio with his wife and two children.



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SPANGENBERG

TRIAL LAWYERS

#### **JEREMY A. TOR, Partner**



Jeremy Tor represents individuals in personal injury cases, including civil rights, wrongful death, medical malpractice, motor vehicle crashes, and premises liability. He has significant trial and litigation experience, having handled cases across Ohio and the country in state and federal courts, including the U.S. Supreme Court. He has obtained numerous significant jury verdicts, including a \$28 million wrongful death jury verdict in Cincinnati and a \$17 million wrongful death jury verdict in Cleveland. Jeremy has also obtained numerous six-, seven-, and eight-figure settlements on behalf of his clients.

Jeremy helps lead the team of law firms

representing U.S. soldiers and Gold Star families in federal courts in D.C. and New York in cases brought under the Anti-Terrorism Act and the Foreign Sovereign Immunities Act. The cases seek justice against the government of Iran for providing financial support to terrorist groups that committed terrorist attacks against Coalition Forces in Iraq between 2003 and 2011.

Before joining the Spangenberg firm, Jeremy served as a law clerk to a federal district court judge in Ohio. He received his law degree in 2011 from the University of Virginia, where he was awarded the Eppa Hunton IV Memorial Book Award, given by the faculty to a graduating student "who has demonstrated unusual aptitude in litigation courses and shown a keen awareness and understanding of the lawyer's ethical and professional responsibility."

Before law school, Jeremy was a Teach For America corps member in Baltimore, where he taught Spanish to high school students at a public school in Baltimore and earned a Master's in teaching from Johns Hopkins University.



For college, Jeremy went to the University of Arizona on a full ride scholarship, obtaining a dual Bachelor's degree in Political Science and Spanish, graduating with Honors, *summa cum laude*. At graduation, he received the Outstanding Senior Award as the top graduate in Political Science. Jeremy was President and Captain of his college mock trial team, participating in numerous tournaments across the country and earning nearly a dozen Outstanding Attorney awards.



Jeremy is a "trailing spouse," brought to Cleveland courtesy of his wife, Shira, who grew up in Beachwood and is now an orthodontist at Weiss & Tor Orthodontics. Jeremy and Shira are proud and happy parents of three young girls.

Jeremy grew up in Tucson. After finishing college, he began the journey that took him to Baltimore (to teach), Virginia (to law school), New York (to work), Israel (to study abroad), and to Latin America, including Mexico, the Dominican Republic, Honduras, and Paraguay, where he directed a development program focused on community-based environmental and health projects. Jeremy is glad the journey has come to an end and that he and his family have planted their roots in Cleveland.

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SHIBLEY & LIBER

TRIAL LAWYERS

#### **DUSTIN B. HERMAN, Partner**



Dustin B. Herman is a partner with Spangenberg Shibley & Liber in Cleveland, OH, where he concentrates his practice on pharmaceutical and medical device litigation, products liability, medical malpractice, catastrophic/brain injury cases, and trucking cases.

In 2013, Dustin was named as one of south FL's "Most Effective Lawyers" by the Daily Business Review for his role in obtaining a \$28.5 million verdict in a traumatic brain injury case. In 2014–2022, Dustin was selected as one of the National Trial Lawyers" "Top 100 Trial Lawyers" (for south Florida/Ohio). In 2015, 2017-2022, Dustin was named as a "Rising Star" by Super Lawyers. In 2023-2024, Dustin was selected to the Super Lawyers list. In 2021-2024, Dustin was selected by his peers to Best Lawyers®—Product Liability, Medical

Malpractice, and Mass Torts. In April 2022, Dustin and Dennis Lansdowne obtained a \$6.5 million verdict in a medical malpractice-wrongful death case. In February 2023, Dustin and Nick DiCello obtained a \$6 million verdict in a medical malpractice-wrongful death case. In 2024, Dustin was named as Best Lawyers® "Lawyer of the Year" for Cleveland, Products Liability.

Dustin is a *Past-President* of the National Trial Lawyers' 40 Under 40. He currently serves on the *Executive Committee* for the Ohio Association for Justice and is the Secretary for the Cleveland Academy of Trial Attorneys. Dustin served as Co-Chair of AAJ's Gas Drilling/Fracking Litigation Group from 2015-2016 and as Co-Chair of AAJ's Contaminated Eye-Injection Ligation Group from 2018-2020. Dustin speaks nationally on various legal topics, with a specific focus on *Daubert* issues, e-discovery, and medical malpractice. He co-authored a chapter in the 4th Edition of AAJ's "Anatomy of a Personal Injury Lawsuit," which was released in March 2015 by Trial Guides and AAJ.

Dustin has been or is currently representing clients in the following mass tort cases: MDL 2804, In re: National Prescription Opiate Litigation (*Law and Briefing Committee*); MDL 2606, In re: Benicar (Olmesartan) Products Liability Litigation (*Daubert Briefing Committee*); Anti-Terrorism Litigation, 1:17-cv-08709, *O'Sullivan, et al. v. Deutsche Bank AG, et al.* (S.D.N.Y) and 1:17-cv-00915, *Holladay, et al. v. The Islamic Republic of Iran* (D.D.C.) (*Co-Chair, Discovery Committee*; *Law and Briefing Committee*); Silicone Contaminated Eye Injection Litigation, pending in state courts in Arizona, New York, and Florida (*co-lead counsel*); In re: Stryker Rejuvenate and ABGII Hip Implant Products Liability Litigation (one of the lead lawyers who litigated cases in Florida state courts); MDL 2331, In Re Propecia (Finasteride) Product Liability Litigation (*Science Committee*); MDL 2327, In re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation; MDL 2299, In re: Actos (Pioglitazone) Products Liability Litigation; MDL 2244, In re: DePuy Orthopaedics Pinnacle Hip Implant Products Liability Litigation; MDL 2197, In re: DePuy Orthopaedics ASR Hip Implant Litigation; and MDL 2179, In re: Oil Spill by the Oil Rig "Deepwater Horizon."

Dustin received his undergraduate degree from the University of Florida. He received his law degree from Florida International University College of Law, where he was a member of the FIU Trial and Moot Court Teams. Dustin earned the Book Award in Evidence and multiple Dean's List awards while in law school. In 2008, Dustin studied European Union law at Universidad de Sevilla and in 2009 he was given the opportunity to go to Florence, Italy where he studied International Criminal Law and other international policies concerning "Social Justice."

Dustin and his wife, Dana, moved to Ohio from Delray Beach, FL in 2015. They live in Twinsburg, Ohio with their son, Dylan, and daughter, Ava.



#### MICHAEL P. LEWS, Associate



Michael is a trial attorney whose diverse practice currently includes personal injury, medical malpractice, and civil rights. Michael joined Spangenberg, Shibley & Liber LLP in 2020 after practicing in Los Angeles, California with a nationally recognized plaintiff's firm. Michael grew up in Huntsville, Alabama, and moved to Northeast Ohio to raise his two children with his wife, Robyn, who is a native of Chagrin Falls.

Michael has a history of large recoveries on a wide variety of cases, such as wrongful death, police misconduct, insurance bad faith, construction defect, and traumatic brain injuries. Most notably, in 2022, he received a \$16.9 million dollar verdict in a trial in the Cuyahoga County Court of Common Pleas on behalf of

the estate of a 54-year-old husband and father who died while performing work in a construction zone on a road.

Some of Michael's notable cases include the representation of an autistic teenager whose lawsuit alleged the insurance company breached its contract with him by denying him the therapy he needed to develop and learn. Michael recovered over \$3 million in that case, after winning at California's Second District Court of Appeal.

Michael has also recovered millions against law enforcement agencies that violated the Constitutional rights of his clients. In 2016, Michael recovered \$2,500,000 against the Los Angeles County Sheriff's Department for shooting his innocent, unarmed client in the leg and killing his best friend.

Despite always working to quickly and efficiently resolve his clients' cases, Michael knows that sometimes a trial by jury is the only way to get justice. In 2019 and 2020, Michael stood up to the tobacco industry in Florida, representing families who lost loved ones due to the industry's decades-long conspiracy to conceal the dangers of smoking from the American public, as part of Florida's ongoing Engle class action litigation. Those three-week wrongful death trials provided invaluable courtroom experience.

For law school, Michael attended Loyola Law School - Los Angeles, where he was a member of the nationally-ranked Byrne Trial Advocacy Team. On the Byrne Team, Michael was a National Finalist in both the National Trial Competition in Texas, as well as the Tournament of Champions in Birmingham, Alabama. Upon graduation, Michael was recognized as Loyola Law School's Robinson Trial Advocacy Scholar and also received the ABOTA Award for Excellence in Trial Advocacy from the American Board of Trial Advocacy.

Prior to law school, Michael was awarded a United States Fulbright Scholarship and spent a year living and working in Dresden, Germany. Michael received his undergraduate education at Wake Forest University in Winston-Salem, NC, studying German and chemistry and graduating with honors.

Michael is an accomplished runner. After initially running in cross country in high school, Michael now competes in marathons. He completed the 2020 Los Angeles Marathon, a road race, and the 2023 Burning River Marathon, a trail run.

#### **KEVIN C. HULICK, Associate**



In the class action space, Kevin has served as class counsel in many class actions. He has taken depositions of company executive officers and experts. His class action experience is broad and includes banking, insurance, deceptive advertising, and data privacy cases.

Kevin also spends a large amount of his time holding law enforcement officers accountable for their violating the rights of citizens. Kevin has achieved multiple favorable settlements for victims of excessive force. He is a member of the National Police Accountability Project.

In addition, Kevin represents individuals who have suffered personal injuries. This includes those injured in car crashes, as a result of premises liability, and victims of medical negligence. Through his work, Kevin has

achieved numerous accolades, including listing as a Rising Star in Super Lawyers since 2021 and Best Lawyers: Ones to Watch, since 2021.

Immediately prior to joining Spangenberg Shibley & Liber LLP, Kevin served as a Law Clerk to the Hon. Benita Y. Pearson in the U.S. District Court, Northern District of Ohio. Before that, he honed his craft and skills as an assistant attorney general working on high profile litigation at the Ohio Attorney General's office and as an associate attorney with a commercial litigation firm, where he drafted motions and represented a liquidating trust in suing numerous banks for breaching representations and warranties in the sale of mortgage loans.

Kevin double-majored in economics and political science with a minor in philosophy at Youngstown State University, where he graduated summa cum laude. He was the commencement speaker at his graduation ceremony. Immediately after his graduation—the day after, in fact—Kevin moved to Charlottesville, Virginia, where he attended the University of Virginia School of Law. While in law school, Kevin competed in moot court and was a founding member of Barrister's United, the school's soccer club.

Outside of work, Kevin is an avid runner and regularly competes in the Cleveland Metro Bar Association's Run for Justice.

Kevin is admitted to practice in Ohio, the United States Court of Appeals for the Sixth Circuit, the United States District Court for the Northern District of Ohio, and the United States District Court for the Southern District of Ohio.

#### Some of Kevin's Case Results Include:

- A \$3.97 million medical malpractice jury verdict for permanent injuries sustained during a typically routine biopsy procedure.
- An \$8 million settlement in a premises liability and professional negligence case involving a catastrophic leg injury that
  occurred when a car struck concrete bollard in the Flats East Bank, causing the bollard to shatter and strike the injured
  party.
- Numerous settlements for the victims of the use of excessive force by law enforcement officers.
- Successfully argued an appeal before the United States Sixth Circuit in a case involving the deadly shooting of a motorist slowing to a stop.
- A six-figure settlement in a Dram Shop Act case.
- Multiple class action settlements for improper withholding of sales tax to insureds who suffered total vehicle losses.

## EXHIBIT 5

Fifth Third Early Access Class Action: Summary of Time Entries thru 12-20-2023						
Attorney/Clerk Name	Total Hours	Years of Out of Law School	_	usted Laffey ourly Rate		Dollar Total
Attorney	1,331.22					
Daniel Frech	180.30	11-19 Years	\$	878.00	\$	158,303.40
Dennis Lansdowne	130.61	20+ years	\$	1,057.00	\$	138,054.77
Jeradon Mura	7.93	4-7 years	\$	538.00	\$	4,266.34
Jeremy Tor	1.34	11-19 years	\$	878.00	\$	1,176.52
Kevin Hulick	266.15	8-10 years	\$	777.00	\$	206,798.55
Stuart Scott	744.89	20+ years	\$	1,057.00	\$	787,348.73
Law Clerk	22.92					
Hudson Curtin	21.72		\$	239.00	\$	5,191.08
Kyra Wieber	1.20		\$	239.00	\$	286.80
Staff	2.36					
Samantha Oetting	2.36		\$	239.00	\$	564.04
Grand Total	1,356.50				\$	1,301,990.23

F	Fifth Third Early Access Class Action: Spangenber Shibley & Liber Time Entries					
<u>Date</u>	<u>Notes</u>	<u>Hours</u>	Name	Role		
	Reviewed Scott Decision, early access documents and Ohio law; conference with Mr.					
July 16, 2012	Scott re: same.	3.5	Daniel Frech	Attorney		
	Review of Ohio and federal law; conference with Mr. Scott, Mr. Kaliel and Mr. Zavareei					
July 18, 2012	re:	4.2	Daniel Frech	Attorney		
July 19, 2012	Legal research.	5.1	Daniel Frech	Attorney		
July 21, 2012	Statutory research.	3	Daniel Frech	Attorney		
	Phone conference with Mr. Kaliel & Mr. Zavareei re:					
July 23, 2012		2.6	Daniel Frech	Attorney		
	Phone conference with Jeff Kaliel and Hassan Zavareei to discuss					
July 23, 2012		0.5	Stuart Scott	Attorney		
July 24, 2012	Review and edit Complaint.	2.4	Daniel Frech	Attorney		
July 24, 2012	Review Ohio banking law and Fifth Third Account Agreement.	1.75	Stuart Scott	Attorney		
July 25, 2012	Review and edit Complaint.	1	Daniel Frech	Attorney		
July 25, 2012	Review and edit Complaint.	1	Stuart Scott	Attorney		
July 27, 2012	Review and edit Complaint.	1.5	Daniel Frech	Attorney		
July 30, 2012	Review and edit Complaint and research Ohio law.	0.8	Daniel Frech	Attorney		
July 31, 2012	Correspond with Mr. Kaliel, Mr. Zavareei and Mr. Scott re:	0.4	Daniel Frech	Attorney		
August 3, 2012	Finalize and file Complaint.	2	Daniel Frech	Attorney		
August 15, 2012	Phone conference with prospective Ohio Class Rep,	0.33	Stuart Scott	Attorney		
August 16, 2012	Coordinate to contact reporters re: Fifth Third; calls with potential class representatives.	1.9	Daniel Frech	Attorney		
August 17, 2012	Phone conference with potential class representative.	0.2	Daniel Frech	Attorney		
August 17, 2012	Phone conference with prospective Class Rep,	0.33	Stuart Scott	Attorney		
August 20, 2012	Phone conference with potential class representative.	0.5	Daniel Frech	Attorney		
August 20, 2012	Phone conference with defense counsel.	0.17	Stuart Scott	Attorney		
August 23, 2012	Phone conference with potential class representative.	0.5	Daniel Frech	Attorney		
August 23, 2012	Review Law Review articles forwarded by professor.	2.9	Daniel Frech	Attorney		
August 27, 2012	Phone conference with potential class representatives.	0.2	Daniel Frech	Attorney		
August 27, 2012	Meet with potential class representative at Starbucks.	1.5	Daniel Frech	Attorney		
August 31, 2012	Review Tycko & Zavareei Pro Hac Vice Motions.	0.3	Daniel Frech	Attorney		
September 4, 2012	Correspond with potential class rep, Scott Little.	0.3	Daniel Frech	Attorney		
September 5, 2012	Correspond with counsel re: ; call with potential class representative.	0.5	Daniel Frech	Attorney		
September 7, 2012	Conference call with Mr. Kaliel, Mr. Barnow and Mr. Scott.	0.5	Daniel Frech	Attorney		

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
September 7, 2012	Phone conference with Mr. Kaliel, Mr. Barnow and Mr. Frech.	0.5	Stuart Scott	Attorney
September 10, 2012	Meet with potential class representative, Lynn Adanich.	1.1	Daniel Frech	Attorney
	Conference call with co-counsel re:			
September 18, 2012		1.5	Daniel Frech	Attorney
September 19, 2012	Correspond with co-counsel and defense counsel re: scheduling issues.	1	Daniel Frech	Attorney
September 24, 2012	Summarize meeting with potential class rep, Ms. Adanich.	0.3	Daniel Frech	Attorney
October 2, 2012	Prepare for and attend Rule 26(f) conference.	1.1	Daniel Frech	Attorney
October 7, 2012	Review Rule 26 Disclosures.	0.3	Daniel Frech	Attorney
October 7, 2012	Review Rule 26 Disclosures.	0.17	Stuart Scott	Attorney
October 8, 2012	Review letter to defense counsel.	0.1	Daniel Frech	Attorney
October 8, 2012	Review letter to defense counsel requesting sample data; email co-counsel re: same.	0.17	Stuart Scott	Attorney
October 10, 2012	Review Show Cause Order; begin legal research re: same.	1.5	Daniel Frech	Attorney
October 12, 2012	Summarize meeting with Scott Little.	0.4	Daniel Frech	Attorney
October 15, 2012	Review, research and edit brief responding to motion to transfer venue.	1.7	Daniel Frech	Attorney
October 15, 2012	Review and comment on brief opposing motion to transfer venue.	0.5	Stuart Scott	Attorney
October 16, 2012	Review, research, edit and file opposition to motion to transfer venue.	2.2	Daniel Frech	Attorney
October 16, 2012	Review and edit opposition to motion to transfer venue.	1.17	Stuart Scott	Attorney
October 17, 2012	Review Defendant's brief on motion to transfer venue.	0.3	Daniel Frech	Attorney
October 17, 2012	Review Defendant's brief on motion to transfer venue.	0.25	Stuart Scott	Attorney
	Correspond with Plaintiffs' counsel re: attendance at case management conference; file	:		
October 18, 2012	motions re: same.	0.5	Daniel Frech	Attorney
October 22, 2012	Prepare report of parties' planning meeting.	0.3	Daniel Frech	Attorney
October 22, 2012	Review and edit Rule 26(f) Disclosures; call to Karl Fanter re: same.	0.58	Stuart Scott	Attorney
October 24, 2012	Draft amended complaint and correspond with co-counsel re: same.	2.1	Daniel Frech	Attorney
October 24, 2012	Review Defendant's Motion to Dismiss.	1.1	Daniel Frech	Attorney
October 24, 2012	Research venue issues.	3	Daniel Frech	Attorney
October 24, 2012	Phone conference with counsel for new party Plaintiffs re:	0.17	Stuart Scott	Attorney
	Draft Motion re: venue and research same; circulate to co-counsel and discuss with co-			
October 25, 2012	counsel.	3.7	Daniel Frech	Attorney
October 25, 2012	Review and edit supplemental venue brief.	0.33	Stuart Scott	Attorney
October 25, 2012	Review and edit amended complaint.	0.42	Stuart Scott	Attorney
October 26, 2012	Review and file supplemental brief on venue.	1.5	Daniel Frech	Attorney
October 31, 2012	Review Order transferring case.	0.2	Daniel Frech	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
October 31, 2012	Review Order and Opinion re: transfer.	0.5	Stuart Scott	Attorney
October 31, 2012	Review and edit response to motion to dismiss.	0.58	Stuart Scott	Attorney
November 13, 2012	Call with co-counsel re: Defendant's Motion to Dismiss.	0.8	Daniel Frech	Attorney
	Draft Motion for Extension to File Brief in Opposition and file same; correspond with co-			
November 27, 2012	counsel re: same.	1.5	Daniel Frech	Attorney
November 29, 2012	Research Brief in Opposition to Motion to Dismiss.	2.2	Daniel Frech	Attorney
December 3, 2012	Research Brief in Opposition to Motion to Dismiss.	1.3	Daniel Frech	Attorney
December 4, 2012	Research Brief in Opposition to Motion to Dismiss.	2.5	Daniel Frech	Attorney
December 7, 2012	Research and draft Brief in Opposition to Motion to Dismiss.	3.5	Daniel Frech	Attorney
December 7, 2012	Review and edit brief in response to Motion to Dismiss.	0.58	Stuart Scott	Attorney
December 10, 2012	Research and draft Brief in Opposition to Motion to Dismiss.	1.5	Daniel Frech	Attorney
December 11, 2012	Research and draft Brief in Opposition to Motion to Dismiss.	2.8	Daniel Frech	Attorney
December 11, 2012	Conference call with co-counsel to discuss Brief to Motion to Dismiss.	0.58	Stuart Scott	Attorney
December 13, 2012	Review and revise Brief in Opposition to Motion to Dismiss.	7.1	Daniel Frech	Attorney
December 13, 2012	Review and edit Brief in Opp to Motion to Dismiss.	3.75	Stuart Scott	Attorney
December 14, 2012	Review, revise and file Brief in Opposition to Dismiss	8.7	Daniel Frech	Attorney
December 14, 2012	Review and edit brief in opposition to Motion to Dismiss.	6.75	Stuart Scott	Attorney
January 16, 2013	Review Rule 26(f) Report.	0.2	Daniel Frech	Attorney
January 16, 2013	Review reply brief.	0.67	Stuart Scott	Attorney
January 17, 2013	Review Defendant's reply brief.	0.6	Daniel Frech	Attorney
January 17, 2013	Edit draft response to reply to motion to dismiss.	1.2	Stuart Scott	Attorney
January 18, 2013	Review and revise discovery requests.	1.33	Stuart Scott	Attorney
January 20, 2013	Review discovery requests.	0.4	Daniel Frech	Attorney
January 20, 2013	Review and revise discovery requests.	1	Stuart Scott	Attorney
January 22, 2013	Conference call w co-counsel re: pretrial.	1	Stuart Scott	Attorney
January 23, 2013	Attend pretrial conference.	0.25	Stuart Scott	Attorney
January 25, 2013	Draft Sur-Reply to motion to dismiss.	1.33	Stuart Scott	Attorney
January 27, 2013	Draft sur-reply to motion to dismiss.	3.1	Daniel Frech	Attorney
January 28, 2013	Review and edit sur-reply to motion to dismiss.	0.3	Daniel Frech	Attorney
January 29, 2013	Review and edit sur-reply to motion to dismiss.	0.4	Daniel Frech	Attorney
January 29, 2013	1 3	0.75	Stuart Scott	Attorney
January 30, 2013	Review and file notice of appearance and sur-reply to motion to dismiss.	1.9	Daniel Frech	Attorney
February 6, 2013	Review Defendant's reply to sur-reply brief.	0.3	Daniel Frech	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
March 4, 2013	Conference call with co-counsel to discuss .	1	Stuart Scott	Attorney
April 4, 2013	Call with co-counsel.	0.5	Daniel Frech	Attorney
April 4, 2013	Phone conference with co-counsel before pretrial conference.	0.5	Stuart Scott	Attorney
April 4, 2013	Attend pretrial conference with court.	0.25	Stuart Scott	Attorney
April 29, 2013	Draft Motion for Extension to File Amended Complaint; research law re: TILA.	1.8	Daniel Frech	Attorney
April 29, 2013	Prepared Motion for Interim Class Counsel and CV of Mr. Scott for motion.	0.58	Stuart Scott	Attorney
April 30, 2013	Review and edit motion for appointment of interim class counsel.	0.5	Stuart Scott	Attorney
May 2, 2013	Revise Amended Complaint.	0.9	Daniel Frech	Attorney
May 8, 2013	Revise and file Amended Complaint.	0.6	Daniel Frech	Attorney
	Review filings from Laskaris Plaintiffs and call with co-			
May 21, 2013		0.9	Daniel Frech	Attorney
	Phone conference with co-counsel to discuss			
May 21, 2013		0.5	Stuart Scott	Attorney
	Review Laskaris Plaintiffs' Motion for Additional Time to Respond to Appointment of			
May 21, 2013	Class Counsel.	0.17	Stuart Scott	Attorney
May 24, 2013	Phone conference with co-counsel to discuss .	0.25	Stuart Scott	Attorney
May 24, 2013	Attend pretrial conference with court.	0.42	Stuart Scott	Attorney
	Review Laskaris Plaintiffs' Opposition to Motion for SSL and co-counsel to be Appointed			
June 5, 2013	Class Counsel; review Local Rules.	0.4	Daniel Frech	Attorney
June 7, 2013	Review and revise letter to Steve Owings re: class representative.	1.1	Daniel Frech	Attorney
June 13, 2013	Status conference with court.	0.33	Stuart Scott	Attorney
June 17, 2013	Review Motion for Leave to File Reply and file same.	0.4	Daniel Frech	Attorney
June 27, 2013	Status conference with court.	0.5	Stuart Scott	Attorney
June 27, 2013	Phone conference with co-counsel to prepare for Status Conference.	0.17	Stuart Scott	Attorney
July 9, 2013	Revise and edit Motion for Class Counsel and Proposed Order.	2.1	Daniel Frech	Attorney
July 9, 2013	Review and edit Motion for Class Counsel.	1.25	Stuart Scott	Attorney
July 12, 2013	Call with Mr. Scott re: meeting with Court.	0.2	Daniel Frech	Attorney
July 12, 2013	In-person court conference regarding lead counsel appointment.	2	Stuart Scott	Attorney
July 12, 2013	travel to and from Cincinnati for court conference.	9	Stuart Scott	Attorney
July 15, 2013	Draft proposed Order for Class Counsel; circulate same to co-counsel.	0.17	Stuart Scott	Attorney
July 16, 2013	Edit Case Management Order.	0.2	Daniel Frech	Attorney
July 16, 2013	Review and edit Entry for Class Counsel.	0.33	Stuart Scott	Attorney
July 16, 2013	Review and edit Entry for Class Counsel.	0.25	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
July 19, 2013		0.5	Stuart Scott	Attorney
July 19, 2013	Phone conference w/ Co-Leads to discuss State Claims, consolidation.	0.3	Stuart Scott	Attorney
July 22, 2013	Final review of Billing & Expense Protocol.	0.2	Stuart Scott	Attorney
July 23, 2013	Phone conference w/ Karl Fanter to discuss consolidation; email to Hassan Zavareei.	0.4	Stuart Scott	Attorney
July 26, 2013	Email from Karl Fanter re: consolidation.	0.1	Stuart Scott	Attorney
July 26, 2013	Response to Karl Fanter.	0.2	Stuart Scott	Attorney
August 19, 2013	Call with PSC to discuss	1	Stuart Scott	Attorney
August 19, 2013	Review and comment on task assignments.	0.4	Stuart Scott	Attorney
August 22, 2013	Review case law re:	0.3	Stuart Scott	Attorney
August 25, 2013	Review new account agreement; email Mr. Kaliel, Mr. Zavareei and Mr. Scott re: same.	0.7	Daniel Frech	Attorney
August 27, 2013	Review and respond to Mr. Kaliel's email re:	0.8	Daniel Frech	Attorney
	Call with Mr. Zavareei; edit Motion to Consolidate; discussion with Mr. Scott re:			
August 28, 2013		1	Daniel Frech	Attorney
August 29, 2013	Phone call with Mr. Fanter.	0.2	Stuart Scott	Attorney
September 3, 2013	Call with PSC; summarize call.	1	Stuart Scott	Attorney
	Review case law on ; email Mr. Zavareei, Mr. Kaliel			
September 11, 2013	and Mr. Scott re:	2.3	Daniel Frech	Attorney
September 13, 2013	Final review and edit on task assignments and send out assignments re: Ohio.	0.2	Stuart Scott	Attorney
September 21, 2013	Reviewed material for call re: structure of Consolidated Complaint.	1	Daniel Frech	Attorney
	Call with Mr. Whittemore, Mr. Kaliel, Mr. Zavaareei and Mr. Scott re:			
September 23, 2013		0.6	Daniel Frech	Attorney
September 23, 2013	Call with PSC.	0.6	Stuart Scott	Attorney
September 23, 2013	Draft outline for Consolidated Complaint based on discussions.	2.9	Daniel Frech	Attorney
	Phone call with PSC re: ; follow up research on			
September 24, 2013	same.	1.1	Daniel Frech	Attorney
September 24, 2013	Conference call with PSC to discuss	1.3	Stuart Scott	Attorney
September 28, 2013	Draft Consolidated Complaint (Claims).	2.6	Daniel Frech	Attorney
September 30, 2013	Draft Consolidation Complaint (Claims).	2.5	Daniel Frech	Attorney
October 2, 2013	Conference call with PSC regarding	0.4	Stuart Scott	Attorney
October 3, 2013	Draft Complaint.	0.7	Daniel Frech	Attorney
October 4, 2013	Draft Complaint; consolidate complete Complaint and circulate to PSC.	3.5	Daniel Frech	Attorney
October 8, 2013	Review and edit Consolidated Complaint.	1.8	Stuart Scott	Attorney
October 9, 2013	Review Complaint.	0.4	Daniel Frech	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
October 10, 2013	Review Adanich Plaintiff Questionnaire.	0.2	Daniel Frech	Attorney
October 11, 2013	Draft, review and edit Complaint. Communicate with PSC re: same.	1.1	Daniel Frech	Attorney
October 11, 2013	Review Plaintiff Fact Sheet and email PSC re:	0.3	Stuart Scott	Attorney
October 15, 2013	Review and edit Consolidated Complaint.	1.2	Stuart Scott	Attorney
October 17, 2013	Review filings and Order.	0.3	Daniel Frech	Attorney
October 17, 2013	Review filings and order.	0.3	Stuart Scott	Attorney
December 13, 2013	Review Defendant's Motion to Dismiss; review Local Rules; correspond with PSC re:	1.2	Daniel Frech	Attorney
December 16, 2013	Review Motion to Dismiss.	1.1	Stuart Scott	Attorney
December 19, 2013	Review Complaint; call with PSC re: same.	1.4	Daniel Frech	Attorney
December 19, 2013	Call with PSC to discuss complaint.	0.7	Stuart Scott	Attorney
December 30, 2013	Research for brief in opposition to Motion to Dismiss.	2.5	Daniel Frech	Attorney
December 31, 2013	Research for brief in opposition to Motion to Dismiss.	0.7	Daniel Frech	Attorney
January 3, 2014	Research for brief in opposition to Motion to Dismiss.	4.1	Daniel Frech	Attorney
January 5, 2014	Research for brief in opposition to Motion to Dismiss.	1	Daniel Frech	Attorney
January 6, 2014	Draft and edit brief in opposition to Motion to Dismiss.	6.5	Daniel Frech	Attorney
January 7, 2014	Draft and edit brief in opposition to Motion to Dismiss.	2	Daniel Frech	Attorney
January 8, 2014	Draft and edit brief in opposition to Motion to Dismiss.	3.5	Daniel Frech	Attorney
January 9, 2014	Draft and edit brief in opposition to Motion to Dismiss.	4.3	Daniel Frech	Attorney
January 10, 2014	Draft and edit brief in opposition to Motion to Dismiss.	4.7	Daniel Frech	Attorney
January 12, 2014	Draft and edit Motion to Dismiss response.	1.5	Stuart Scott	Attorney
January 13, 2014	Review and edit brief in opposition to motion to dismiss.	0.8	Daniel Frech	Attorney
January 13, 2014	Review and edit brief in opposition to motion to dismiss.	0.3	Stuart Scott	Attorney
January 16, 2014	Review and edit brief in opposition to motion to dismiss.	1.9	Daniel Frech	Attorney
January 17, 2014	Review and edit brief in opposition to motion to dismiss.	2.5	Daniel Frech	Attorney
January 17, 2014	Review and edit brief in opposition to motion to dismiss.	1.2	Stuart Scott	Attorney
January 20, 2014	Review and edit brief in opposition to motion to dismiss.	3.1	Daniel Frech	Attorney
January 21, 2014	Review and edit brief in opposition to motion to dismiss.	7.8	Daniel Frech	Attorney
February 25, 2014	Review and respond to inquiry from potential class member.	0.3	Daniel Frech	Attorney
March 6, 2014	Review Defendant's Reply Brief; correspond with Mr. Kaliel re: same.	0.8	Daniel Frech	Attorney
August 18, 2014	PSC call to discuss class definition and damages.	0.6	Daniel Frech	Attorney
August 19, 2014	Review Defendant's Response to Plaintiffs' Notice of Supplemental Authority.	0.2	Stuart Scott	Attorney
April 8, 2015	Review Court Opinion.	0.8	Stuart Scott	Attorney
April 19, 2015	Review email from Karl Fanter regarding discovery; respond to same.	0.3	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
April 29, 2015	Call with PSC to prepare for pretrial.	0.7	Stuart Scott	Attorney
June 23, 2015	Review Protective Order and discovery responses; email PSC re: Meet & Confer.	1.5	Stuart Scott	Attorney
	Analyze Defendant's discovery responses and objections. Email PSC regarding			
June 24, 2015		1.7	Stuart Scott	Attorney
July 7, 2015	Review letter from defense counsel; e-mail response re: Protective Order	0.3	Stuart Scott	Attorney
July 8, 2015	Prepare for call with Mr. Fanter re: Confidentiality Order.	0.3	Stuart Scott	Attorney
July 8, 2015	Call with Mr. Fanter to discuss Confidentiality Order.	0.5	Stuart Scott	Attorney
July 8, 2015	Email PSC re: call with Mr. Fanter.	0.2	Stuart Scott	Attorney
July 15, 2015	Revise letter to defense counsel re: discovery dispute.	0.9	Stuart Scott	Attorney
July 16, 2015	Review, revise, and execute Protective Order.	0.8	Stuart Scott	Attorney
July 23, 2015	Prepare for call with defense counsel.	0.5	Stuart Scott	Attorney
July 23, 2015	Call with defense counsel re: discovery issues.	0.8	Stuart Scott	Attorney
August 9, 2015	Review letter from defense counsel re: discovery issues; email PSC regarding letter.	0.5	Stuart Scott	Attorney
August 11, 2015	Call with Mr. Zavareei and Mr. Whittemore to discuss	0.5	Stuart Scott	Attorney
August 24, 2015	Review August 7 letter from defense counsel; e-mail Mr. Kaliel regarding response to	0.5	Stuart Scott	Attorney
August 28, 2015	Email to Mr. Fanter re: discovery.	0.2	Stuart Scott	Attorney
August 31, 2015	Email Mr. Scott re:	0.2	Daniel Frech	Attorney
September 3, 2015	Meet and confer with defense counsel.	0.6	Stuart Scott	Attorney
September 20, 2015	Email Mr. Scott regarding	0.8	Daniel Frech	Attorney
September 25, 2015	Call with PSC to discuss	0.5	Stuart Scott	Attorney
October 10, 2015	Call with PSC regarding	0.3	Stuart Scott	Attorney
October 15, 2015	Attend telephonic status conference.	0.4	Stuart Scott	Attorney
November 4, 2015	Call with Mr. Barnow regarding	1	Stuart Scott	Attorney
November 11, 2015	Email Mr. Fanter regarding discovery.	0.3	Stuart Scott	Attorney
February 17, 2016	Email to firm partnership re:	0.25	Stuart Scott	Attorney
February 17, 2016	Email PSC.	0.25	Stuart Scott	Attorney
February 17, 2016	PSC call discuss	0.5	Stuart Scott	Attorney
September 26, 2016	Attend court conference.	0.5	Stuart Scott	Attorney
September 26, 2016	Prepare for court conference.	0.5	Stuart Scott	Attorney
September 26, 2016	Review proposed settlement.	0.6	Stuart Scott	Attorney
October 12, 2016	Call with PSC re:	0.5	Stuart Scott	Attorney
November 15, 2016	Review Release.	1.5	Stuart Scott	Attorney
November 30, 2016	Review allocation of settlement.	0.5	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
			Samantha	
November 30, 2016	Email potential plaintiffs for receipts/bank statements.	0.59	Oetting	Staff
			Samantha	
December 5, 2016	Contact potential Plaintiffs regarding	0.61	Oetting	Staff
December 23, 2016	Research .	3.5	Stuart Scott	Attorney
December 23, 2016	PSC call re:	1	Stuart Scott	Attorney
December 23, 2016	Review terms of settlement; email PSC re:	0.7	Stuart Scott	Attorney
January 4, 2017	PSC meeting re:	1	Stuart Scott	Attorney
January 5, 2017	Draft memo on .	1	Stuart Scott	Attorney
January 5, 2017	Research issues related to .	1.3	Stuart Scott	Attorney
January 12, 2017	Call with PSC; call with defense counsel.	0.7	Stuart Scott	Attorney
January 13, 2017	PSC discussion re:	0.7	Stuart Scott	Attorney
February 15, 2017	Email PSC re:	0.3	Stuart Scott	Attorney
March 8, 2017	Call with PSC.	0.25	Stuart Scott	Attorney
March 8, 2017	Call with defense counsel.	0.2	Stuart Scott	Attorney
March 8, 2017	Follow up call with PSC.	0.5	Stuart Scott	Attorney
March 8, 2017	Draft letter to defense counsel re: court hearing and data.	0.5	Stuart Scott	Attorney
	Emails between PSC re:			
March 10, 2017		0.7	Stuart Scott	Attorney
March 16, 2017	Email PSC re:	0.35	Stuart Scott	Attorney
March 29, 2017	Edit letter to Court.	1.1	Stuart Scott	Attorney
			Samantha	
June 7, 2017	Call potential class representatives.	0.74	Oetting	Staff
			Samantha	
June 9, 2017	Update spreadsheet with contacts that contacted firm	0.42	Oetting	Staff
November 9, 2017	Attend settlement conference	2.5	Stuart Scott	Attorney
November 9, 2017	Travel for settlement conference.	5	Stuart Scott	Attorney
November 9, 2017	Prepare for settlement conference.	2	Stuart Scott	Attorney
May 29, 2019	Draft letter to defense counsel asking Defendant to update discovery responses.	0.7	Kevin Hulick	Attorney
			Dennis	
June 2, 2019	Review and propound discovery requests.	0.5	Lansdowne	Attorney
June 2, 2019	Review and edit discovery requests.	0.7	Stuart Scott	Attorney
June 3, 2019	Update discovery requests, including adding second set of interrogatories.	0.5	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
June 3, 2019	Call with PSC to discuss .	0.6	Stuart Scott	Attorney
June 3, 2019	Call with PSC to discuss	0.6	Kevin Hulick	Attorney
			Dennis	
June 3, 2019	Exchange emails with Mr. Scott and discuss	0.8	Lansdowne	Attorney
June 6, 2019	Conference call with PSC and appellate counsel.	0.5	Stuart Scott	Attorney
June 7, 2019	Email PSC on	0.2	Stuart Scott	Attorney
June 20, 2019	Email memo to PSC on .	0.25	Stuart Scott	Attorney
June 20, 2019	Review motion for CMC.	0.2	Stuart Scott	Attorney
			Dennis	
June 22, 2019	Review Plaintiffs' filing regarding stay.	0.17	Lansdowne	Attorney
June 28, 2019	Exchange emails among PSC regarding	0.3	Stuart Scott	Attorney
June 28, 2019	Review Court Order.	0.1	Stuart Scott	Attorney
June 28, 2019	Draft letter to defense counsel re: lifting of stay and discovery.	0.25	Stuart Scott	Attorney
July 1, 2019	Call with PSC to prepare for TSC.	0.5	Stuart Scott	Attorney
July 1, 2019	TSC with Court.	0.5	Stuart Scott	Attorney
July 1, 2019	Post-TSC call with team.	0.3	Stuart Scott	Attorney
July 1, 2019	Email defense counsel re: case schedule.	0.25	Stuart Scott	Attorney
			Dennis	
July 1, 2019	Meet with Mr. Scott to discuss	0.17	Lansdowne	Attorney
July 1, 2019	TSC with court	0.2	Kevin Hulick	Attorney
July 1, 2019	phone calls with co-counsel to discuss	0.3	Kevin Hulick	Attorney
July 1, 2019	Review second set of discovery requests.	0.4	Kevin Hulick	Attorney
July 2, 2019	Email exchange with defense counsel.	0.25	Stuart Scott	Attorney
July 2, 2019	Review the joint discovery plan and email Mr. Whittemore on same.	0.25	Stuart Scott	Attorney
July 9, 2019	Email to Ms. Haac re: outstanding discovery.	0.2	Stuart Scott	Attorney
July 10, 2019	Call with defense counsel regarding case management order.	0.5	Stuart Scott	Attorney
July 10, 2019	Call with defense counsel regarding case management order	0.5	Kevin Hulick	Attorney
	Emails amongst PSC			
July 23, 2019		0.5	Stuart Scott	Attorney
July 23, 2019	Conference call to discuss .	0.4	Stuart Scott	Attorney
July 24, 2019	Review discovery letter.	0.2	Stuart Scott	Attorney
July 31, 2019	Attend CMC.	0.25	Stuart Scott	Attorney
August 18, 2019	Research caselaw on .	0.6	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
August 19, 2019	Meeting with Mr. Scott discussing depositions of class reps; conduct related research.	1.34	Jeremy Tor	Attorney
August 19, 2019	Review Defendant's discovery.	0.5	Stuart Scott	Attorney
			Dennis	
August 20, 2019	Review 6th Circuit opinion.	0.33	Lansdowne	Attorney
August 23, 2019	review discovey responses	0.5	Stuart Scott	Attorney
			Dennis	
August 31, 2019	Review S.D.Ohio caselaw on similar cases.	0.25	Lansdowne	Attorney
September 5, 2019	Email team proposed edits to discovery letter.	0.35	Stuart Scott	Attorney
September 9, 2019	Review letter regarding discovery issues and email team on same.	0.4	Stuart Scott	Attorney
September 11, 2019	Prepare draft discovery responses.	2.5	Stuart Scott	Attorney
September 13, 2019	Review and revise Plaintiffs' discovery responses.	1.6	Stuart Scott	Attorney
September 14, 2019	Review and revise Plaintiffs' discovery responses.	2.3	Stuart Scott	Attorney
September 16, 2019	Review potentially responsive materials to Defendant's discovery requests.	0.7	Stuart Scott	Attorney
September 19, 2019	Prep for telephonic meet and confer; attend telephonic meet and confer.	1	Stuart Scott	Attorney
September 19, 2019	Email team re:	0.25	Stuart Scott	Attorney
September 21, 2019	Edit Interrogatory responses.	0.5	Stuart Scott	Attorney
September 22, 2019	Edit responses to requests for production.	0.75	Stuart Scott	Attorney
September 24, 2019	Edit discovery responses and circulate to PSC for final review.	0.6	Stuart Scott	Attorney
October 1, 2019	Research re: Adanich party substitution.	6.43	Jeradon Mura	Attorney
October 2, 2019	Research re: Adanich party substitution.	0.45	Jeradon Mura	Attorney
October 11, 2019	Research re: Adanich party substitution.	1.05	Jeradon Mura	Attorney
October 19, 2019	Review Answer.	0.5	Stuart Scott	Attorney
October 19, 2019	Review and edit suggestion of death.	0.3	Stuart Scott	Attorney
October 29, 2019	Call with Mr. Zavareei and Ms. Haac.	0.5	Stuart Scott	Attorney
October 29, 2019	Review of defense counsel's letter regarding plaintiffs discovery responses.	0.2	Stuart Scott	Attorney
			Dennis	
October 30, 2019	Review deposition notices; email Mr. Scott re:	0.25	Lansdowne	Attorney
			Dennis	
October 30, 2019	Discussion with Mr. Scott about	0.33	Lansdowne	Attorney
	Phone call with Plaintiffs' counsel to discuss			
November 5, 2019		0.7	Kevin Hulick	Attorney
November 5, 2019	Prep for call with PSC.	0.65	Stuart Scott	Attorney
November 5, 2019	Call with PSC	0.7	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
November 6, 2019	Meet and confer with defense counsel; call with PSC to discuss meet and confer.	0.75	Stuart Scott	Attorney
November 6, 2019	Attend meet and confer; attend phone call with co-counsel to discuss meet and confer.	0.75	Kevin Hulick	Attorney
November 12, 2019	Update amended discovery responses.	0.4	Kevin Hulick	Attorney
November 19, 2019	Email PSC re:	0.5	Stuart Scott	Attorney
November 21, 2019	Call with defense counsel regarding versions of contract.	0.4	Stuart Scott	Attorney
November 26, 2019	Review Defendant's discovery responses.	0.4	Stuart Scott	Attorney
November 26, 2019	Review Defendant's document production.	0.4	Kevin Hulick	Attorney
November 28, 2019	Review production of account agreements.	2.3	Stuart Scott	Attorney
December 2, 2019	Email defense counsel on missing Early Access account agreements in latest production.	0.5	Stuart Scott	Attorney
	Review Defendant's document production; Email PSC about			
December 2, 2019		0.4	Stuart Scott	Attorney
December 9, 2019	Call with PSC to discuss	1	Stuart Scott	Attorney
December 9, 2019	Call with Plaintiffs' team on	1	Kevin Hulick	Attorney
			Dennis	
December 9, 2019	Exchange emails with Mr. Scott regarding	0.33	Lansdowne	Attorney
			Dennis	
December 9, 2019	Conference Call with team re:	0.92	Lansdowne	Attorney
			Dennis	
December 9, 2019	Discussion with Mr. Scott regarding .	0.25	Lansdowne	Attorney
December 10, 2019	Review cases cited in the Defendant's December 9th letter; email PSC regarding same.	2.5	Stuart Scott	Attorney
December 10, 2019	Email Ms. Haac regarding	1.2	Stuart Scott	Attorney
December 12, 2019	Draft memo on .	2	Kevin Hulick	Attorney
December 14, 2019	Draft memo on	2.5	Kevin Hulick	Attorney
December 16, 2019	Call re:	1.25	Stuart Scott	Attorney
December 17, 2019	Deposition preparation.	2.5	Stuart Scott	Attorney
December 18, 2019	Travel for Laskaris deposition.	4.5	Stuart Scott	Attorney
December 18, 2019	Deposition prep meeting with Laskarises.	5	Stuart Scott	Attorney
December 19, 2019	Attend depositions of Lori and Daniel Laskaris.	8	Stuart Scott	Attorney
December 19, 2019	Return travel to Cleveland from Laskaris depositions.	4.5	Stuart Scott	Attorney
December 20, 2019	Email to PSC regarding .	0.5	Stuart Scott	Attorney
	Review December 18 letter from Plaintiffs' counsel on scope of discovery and scheduling			
December 20, 2019	depositions.	0.2	Stuart Scott	Attorney
December 26, 2019	Review and edit Rule 30(b)(6) notice.	1.2	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
December 27, 2019	Draft stipulation of dismissal and notice of death.	0.4	Kevin Hulick	Attorney
	Call with PSC to			
December 30, 2019		1	Stuart Scott	Attorney
January 8, 2020	Update motion to dismiss Horn and Klopfenstein.	0.2	Kevin Hulick	Attorney
January 9, 2020	Review Laskaris deposition transcript.	1.5	Stuart Scott	Attorney
January 13, 2020		0.7	Stuart Scott	Attorney
	Deposition preparation involving review of Laskaris depositions and Fyock notes and			
January 14, 2020	outline.	5	Stuart Scott	Attorney
January 15, 2020	Travel to Chicago and back for Fyock deposition preparation.	7	Stuart Scott	Attorney
January 15, 2020	Fyock deposition preparation meeting.	5	Stuart Scott	Attorney
January 16, 2020	Confirm deposition location for Harrison deposition.	0.25	Stuart Scott	Attorney
	Email PSC regarding			
January 16, 2020		0.5	Stuart Scott	Attorney
January 19, 2020	Email Ms. Haac regarding	0.4	Stuart Scott	Attorney
January 20, 2020	Travel to Chicago for Fyock deposition.	4	Stuart Scott	Attorney
January 21, 2020		0.4	Kevin Hulick	Attorney
January 21, 2020	PSC team call to discuss .	0.5	Stuart Scott	Attorney
January 21, 2020	Fyock deposition prep meeting.	1.5	Stuart Scott	Attorney
January 21, 2020	Attend Fyock deposition.	5	Stuart Scott	Attorney
January 21, 2020	Travel to Nashville for Harrison deposition preparation.	5	Stuart Scott	Attorney
January 23, 2020	Attend Harrison deposition prep meeting.	5	Stuart Scott	Attorney
January 23, 2020	Return travel from Nashville to Cleveland.	5	Stuart Scott	Attorney
January 26, 2020	Prepare for meet and confer scheduled for following day.	1	Stuart Scott	Attorney
January 27, 2020	Attend PSC team call.	1	Stuart Scott	Attorney
January 27, 2020	Meet and confer on the Rule 30(b)(6) notice.	1	Stuart Scott	Attorney
January 27, 2020	Email to PSC regarding .	0.35	Stuart Scott	Attorney
January 29, 2020	Draft mediation position statement.	2.5	Kevin Hulick	Attorney
January 30, 2020	Draft mediation position statement.	2	Kevin Hulick	Attorney
February 3, 2020	Review letter from defense counsel; email PSC regarding same.	0.5	Stuart Scott	Attorney
February 4, 2020	Travel to Nashville for Harrison deposition.	4.5	Stuart Scott	Attorney
February 4, 2020	Attend Harrison deposition prep meeting.	3	Stuart Scott	Attorney
February 5, 2020	Attend Harrison deposition.	6.4	Stuart Scott	Attorney
February 5, 2020	Return travel to Cleveland from Harrison deposition.	4	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
February 5, 2020	Attend Harrison deposition prep meeting.	4	Stuart Scott	Attorney
February 11, 2020	Conference call with PSC re:	0.5	Stuart Scott	Attorney
February 23, 2020	Edit mediation position statement to court.	2.5	Stuart Scott	Attorney
February 25, 2020	Updated mediation statement based on team call.	0.8	Kevin Hulick	Attorney
February 26, 2020	Update mediation statement.	0.6	Kevin Hulick	Attorney
February 26, 2020	Review and edit mediation statement.	1	Stuart Scott	Attorney
			Dennis	
February 27, 2020	Review and edit mediation statement.	0.33	Lansdowne	Attorney
March 8, 2020	Review and edit the mediation statement.	0.5	Stuart Scott	Attorney
March 9, 2020	Update mediation statement.	0.5	Kevin Hulick	Attorney
March 10, 2020	Reviewed Defendant document production.	1.5	Stuart Scott	Attorney
March 16, 2020	Email PSC regarding .	0.6	Stuart Scott	Attorney
			Dennis	
March 16, 2020	Review emails regarding .	0.25	Lansdowne	Attorney
March 16, 2020	PSC team call to discuss settlement demand.	1	Stuart Scott	Attorney
March 16, 2020	Review and edit demand letter.	0.5	Stuart Scott	Attorney
March 18, 2020	Review and edit demand letter.	0.3	Stuart Scott	Attorney
			Dennis	
March 18, 2020	Review and edit demand letter.	0.33	Lansdowne	Attorney
March 23, 2020	Review and edit demand letter.	0.5	Stuart Scott	Attorney
March 25, 2020	Edit mediation position statement.	0.8	Stuart Scott	Attorney
March 26, 2020	PSC call to discuss	1	Stuart Scott	Attorney
	Exchange emails with PSC re:		Dennis	
March 26, 2020		0.25	Lansdowne	Attorney
			Dennis	
March 27, 2020	Review draft of letter to counsel re: Covid 19 issues.	0.17	Lansdowne	Attorney
March 30, 2020	Review relevant caselaw.	0.6	Stuart Scott	Attorney
March 31, 2020	Research .	0.5	Stuart Scott	Attorney
April 2, 2020	Meet and confer with defense counsel.	0.5	Stuart Scott	Attorney
April 2, 2020	Attend post meet and confer call with PSC.	0.25	Stuart Scott	Attorney
	Review letter from defense counsel; Respond to Mr. Scott regarding		Dennis	
April 4, 2020		0.33	Lansdowne	Attorney

<u>Date</u>	Notes	Hours	Name	Role
	Email PSC regarding			
April 5, 2020		0.45	Stuart Scott	Attorney
April 6, 2020	Prepare for call with court.	0.75	Stuart Scott	Attorney
April 6, 2020	Attend telephonic status conference with court.	0.3	Kevin Hulick	Attorney
April 6, 2020	Attend TSC with court.	0.4	Stuart Scott	Attorney
April 6, 2020	Discussion with Mr. Scott on .	0.2	Kevin Hulick	Attorney
	Discuss plan for CMC, review correspondence re same. Review email on plan re summary		Dennis	
April 6, 2020	judgment.	0.25	Lansdowne	Attorney
April 14, 2020	Review draft of class certification brief.	0.7	Kevin Hulick	Attorney
April 14, 2020	Review and edit class certification brief.	2	Stuart Scott	Attorney
April 15, 2020	Review and edit class certification brief.	1.5	Stuart Scott	Attorney
April 15, 2020	PSC call to discuss .	1.2	Stuart Scott	Attorney
			Dennis	
April 15, 2020	Review and edit class certification brief.	0.67	Lansdowne	Attorney
			Dennis	
April 15, 2020	Prepare for and atend onference call with PSC re:	1.58	Lansdowne	Attorney
			Dennis	
April 16, 2020	Review and edit class certification brief.	0.67	Lansdowne	Attorney
April 17, 2020	Review and edit class certification brief.	1.5	Stuart Scott	Attorney
April 17, 2020	Review and edit Olsen declaration.	0.4	Stuart Scott	Attorney
April 18, 2020	Call with PSC.	0.6	Stuart Scott	Attorney
			Dennis	
April 18, 2020	Review options on class definition; respond to Mr. Scott re: same.	0.33	Lansdowne	Attorney
April 20, 2020	Review and edit class certification brief.	1	Stuart Scott	Attorney
			Dennis	
April 20, 2020	Review and edit class certification brief.	1.75	Lansdowne	Attorney
April 24, 2020	Draft partial motion for summary judgment.	1	Kevin Hulick	Attorney
April 25, 2020	Draft motion for partial summary judgment.	5	Kevin Hulick	Attorney
April 26, 2020	Review and edit motion for partial summary judgment.	1.25	Stuart Scott	Attorney
April 27, 2020	Review and edit motion for partial summary judgment.	2.35	Stuart Scott	Attorney
April 30, 2020	Review and edit motion for partial summary judgment.	2.3	Stuart Scott	Attorney
April 30, 2020	Update motion for partial summary judgment based on Mr. Scott's comments.	1	Kevin Hulick	Attorney
May 1, 2020	Update motion for partial summary judgment based on Mr. Scott's comments.	3	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
May 2, 2020	Review and edit motion for partial summary judgment.	1.25	Stuart Scott	Attorney
			Dennis	
May 3, 2020	Review and edit motion for partial summary judgment.	1.49	Lansdowne	Attorney
May 4, 2020	Review and edit motion for partial summary judgment.	1.1	Stuart Scott	Attorney
	Email PSC re:			
May 16, 2020		0.25	Stuart Scott	Attorney
	PSC call to discuss			
May 18, 2020		0.75	Stuart Scott	Attorney
May 21, 2020	Research ; email PSC on same.	1.5	Stuart Scott	Attorney
May 22, 2020	Research .	1	Kevin Hulick	Attorney
May 27, 2020	Call with opposing counsel to discuss agenda for upcoming call and scheduling call.	0.25	Stuart Scott	Attorney
May 29, 2020	Prepare for call with opposing counsel.	0.5	Stuart Scott	Attorney
May 29, 2020	Call opposing counsel to discuss agenda for status call.	0.5	Stuart Scott	Attorney
May 29, 2020	Email PSC regarding .	0.3	Stuart Scott	Attorney
	Email PSC regarding			
May 30, 2020		0.4	Stuart Scott	Attorney
			Dennis	
May 30, 2020	Review emails re deposing Bank pre-certification and proposed email to Bank counsel	0.33	Lansdowne	Attorney
May 30, 2020	Status conference with Court and follow up call with PSC.	0.75	Stuart Scott	Attorney
June 3, 2020	Email to PSC re:	0.25	Stuart Scott	Attorney
June 3, 2020	Call with PSC to prepare for status conference with court.	0.8	Stuart Scott	Attorney
July 1, 2020	Draft memo on	0.65	Stuart Scott	Attorney
July 16, 2020	Edit mediation statement.	0.5	Stuart Scott	Attorney
July 17, 2020	Edit mediation statement.	0.75	Stuart Scott	Attorney
July 18, 2020	Review fifth third's opposition class certification; email PSC re: same.	1.5	Stuart Scott	Attorney
July 18, 2020	Review caselaw cited in Defendant's class certification brief.	1.25	Stuart Scott	Attorney
July 18, 2020	Review Defendant's opposition to motion for class certification.	0.9	Kevin Hulick	Attorney
July 19, 2020	Review caselaw cited by Defendant in class certification opposition.	4	Stuart Scott	Attorney
July 19, 2020	Email PSC regarding analysis of Defendant's class certification brief.	1	Stuart Scott	Attorney
July 20, 2020	Edit mediation brief.	1.5	Stuart Scott	Attorney
July 21, 2020	PSC call to discuss mediation brief	0.75	Stuart Scott	Attorney
	Review Defendant's response to class certification motion. Edit and review Plaintiffs'		Dennis	
July 21, 2020	mediation brief.	2.17	Lansdowne	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
			Dennis	
July 23, 2020	Research and edit mediation statement.	2.75	Lansdowne	Attorney
July 24, 2020	Edit mediation statement, incorporating research.	1.5	Stuart Scott	Attorney
July 24, 2020	Edit mediation statement.	2	Stuart Scott	Attorney
July 24, 2020	Edit mediation statement.	0.9	Kevin Hulick	Attorney
			Dennis	
July 24, 2020	Edit mediation statement; email PSC regarding same.	2.33	Lansdowne	Attorney
August 4, 2020	PSC call to discuss mediation.	1	Stuart Scott	Attorney
August 6, 2020	Call with defense counsel to discuss rescheduling mediation due to coronavirus issues.	0.2	Stuart Scott	Attorney
August 11, 2020	Attend call with court.	0.3	Stuart Scott	Attorney
August 17, 2020	Review reply for class certification.	0.75	Stuart Scott	Attorney
August 17, 2020	Draft reply brief for class certification.	2.2	Stuart Scott	Attorney
August 18, 2020	Draft reply for class certification.	3	Stuart Scott	Attorney
August 19, 2020	Draft reply to class certification motion.	2.5	Stuart Scott	Attorney
August 19, 2020	Draft reply to class certification motion.	1.5	Stuart Scott	Attorney
August 20, 2020	Draft reply to class cert motion.	5.3	Kevin Hulick	Attorney
August 21, 2020	Edit reply to class certification motion.	3.2	Stuart Scott	Attorney
August 21, 2020	Draft reply to class certification motion.	0.4	Kevin Hulick	Attorney
August 22, 2020	Edit reply to class certification motion.	3	Stuart Scott	Attorney
			Dennis	
August 23, 2020	Review draft of reply to class certification motion.	0.5	Lansdowne	Attorney
August 28, 2020	Edit reply to class certification motion.	1.75	Stuart Scott	Attorney
			Dennis	
August 28, 2020	Edit reply to class certification motion.	1.5	Lansdowne	Attorney
August 29, 2020	Edit reply to class certification motion.	5.5	Stuart Scott	Attorney
			Dennis	
August 29, 2020	Review edits to reply to class certification motion; discussion with Mr. Scott re: same.	0.33	Lansdowne	Attorney
August 30, 2020	Edit reply to class certification motion.	2.5	Kevin Hulick	Attorney
			Dennis	
August 30, 2020	Edit reply to class certification motion.	2.33	Lansdowne	Attorney
August 31, 2020	Edit reply to class certification motion.	1.5	Stuart Scott	Attorney
August 31, 2020	Review cases cited in Defendants' opposition to motion for class certification.	2.5	Kevin Hulick	Attorney
September 1, 2020	Edit reply to class certification motion.	1.7	Stuart Scott	Attorney

<u>Date</u>	Notes	Hours	Name	Role
September 2, 2020	Edit reply to class certification motion.	2.5	Kevin Hulick	Attorney
September 2, 2020	Edit reply to class certification motion.	1	Kevin Hulick	Attorney
September 2, 2020	Confer with co-counsel and staff regarding filing of brief.	1.2	Kevin Hulick	Attorney
September 9, 2020	Document review.	0.5	Kevin Hulick	Attorney
September 23, 2020	PSC call to discuss and call with Judge Barrett regarding mediation.	0.75	Stuart Scott	Attorney
September 25, 2020	Status Conference with Court.	0.3	Stuart Scott	Attorney
September 25, 2020	Review Defendant's sur-reply.	0.25	Stuart Scott	Attorney
September 27, 2020	Review and edit opposition to sur-reply.	1	Stuart Scott	Attorney
September 27, 2020	Review and edit opposition to sur-reply.	1.35	Stuart Scott	Attorney
February 1, 2021	PSC call to discuss	0.5	Stuart Scott	Attorney
-	Assess need for further discovery, including for offensive motion for summary judgment			
February 24, 2021	on TILA, breach of contract, and scope of contract term.	1.6	Stuart Scott	Attorney
	Review and edit discovery request; email PSC re:			
March 1, 2021		0.65	Stuart Scott	Attorney
- 1/			Dennis	
March 27, 2021	Review Court opinion. Exchange emails with Mr. Scott about	0.5	Lansdowne	Attorney
March 28, 2021	Review Court opinion on class certification.	0.8	Stuart Scott	Attorney
March 28, 2021	Exchange emails amongst PSC re:	0.5	Stuart Scott	Attorney
March 29, 2021	Research .	4	Kevin Hulick	Attorney
March 30, 2021	PSC meeting to discuss .	0.75	Stuart Scott	Attorney
March 30, 2021	Review and edit motion for partial summary judgment.	1	Stuart Scott	Attorney
March 30, 2021	Draft memo on	1	Kevin Hulick	Attorney
March 30, 2021	Research .	1	Kevin Hulick	Attorney
	Prepare for and attend conference call with PSC to discuss		Dennis	
March 30, 2021		1.58	Lansdowne	Attorney
			Dennis	
March 31, 2021	Email PSC and review emails re:	0.67	Lansdowne	Attorney
	Conference call with TSC re:			
	post-conference discussion with Mr. Scott re:		Dennis	
April 1, 2021		0.5	Lansdowne	Attorney
April 1, 2021	Draft motion for partial summary judgment.	5	Kevin Hulick	Attorney
April 2, 2021	Draft motion for partial summary judgment.	4	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
			Dennis	
April 20, 2021	Review draft discovery requests.	0.33	Lansdowne	Attorney
			Dennis	
April 22, 2021	Review proposed affidavit from expert on notice.	0.33	Lansdowne	Attorney
April 22, 2021	Review proposed notice program.	0.5	Stuart Scott	Attorney
April 23, 2021	Call with PSC and notice administrator to discuss class notice.	0.5	Stuart Scott	Attorney
April 27, 2021	Meet and confer re: class notice.	0.5	Stuart Scott	Attorney
April 27, 2021	Email PSC re:	0.25	Stuart Scott	Attorney
April 27, 2021	Email PSC re:	0.5	Stuart Scott	Attorney
			Dennis	
April 27, 2021	Exchange emails amongst PSC re:	0.33	Lansdowne	Attorney
	Exchange emails amongst PSC regarding			
May 12, 2021		0.75	Stuart Scott	Attorney
May 18, 2021	PSC meeting to discuss	0.75	Stuart Scott	Attorney
	Review Defendant's proposed case schedule, prepare for conference call, and participate	:	Dennis	
May 18, 2021	in conference call with PSC.	2.42	Lansdowne	Attorney
May 19, 2021	Edit supplemental calendar order.	1.5	Stuart Scott	Attorney
May 19, 2021	Edit Defendant's proposed supplemental Calendar Order.	3	Stuart Scott	Attorney
	Draft Plaintiffs' position regarding the parties' submission for an amended case	:		
May 20, 2021	management order.	3.08	Stuart Scott	Attorney
			Dennis	
May 22, 2021	Review proposed case schedule, with edits, compare to Court order and make revisions	1.5	Lansdowne	Attorney
May 24, 2021	PSC call re:	0.5	Stuart Scott	Attorney
May 24, 2021	Review proposed amended case management order.	1.58	Stuart Scott	Attorney
			Dennis	
May 24, 2021	Attend portion of call with PSC re: class notice and scheduling order.	0.33	Lansdowne	Attorney
			Dennis	
May 25, 2021	Review and edit Supp. Calendar Order.	0.67	Lansdowne	Attorney
May 26, 2021	Edit joint proposed case management order.	1.5	Stuart Scott	Attorney
	Review Defendant's responses to Plaintiffs' 4th set of interrogatories and 3rd set of	ì		
May 28, 2021	requests for production.	0.25	Stuart Scott	Attorney
	Email PSC re:			
May 28, 2021		0.17	Stuart Scott	Attorney

<u>Date</u>	Notes	Hours	Name	Role
May 29, 2021	Edit motion for summary judgment on breach of contract and TILA claims.	2.75	Stuart Scott	Attorney
May 30, 2021	Edit motion for partial summary judgment.	4.5	Stuart Scott	Attorney
June 1, 2021	Edit motion for summary judgment on the contract and TILA claims.	2.5	Stuart Scott	Attorney
June 2, 2021	Update letter re class certification.	0.42	Stuart Scott	Attorney
June 3, 2021	Prepare for and attend meet and confer with defense counsel.	1.75	Stuart Scott	Attorney
June 3, 2021	Edit motion for partial summary judgment.	0.75	Stuart Scott	Attorney
			Dennis	
June 3, 2021	Conference call with defense counsel regarding case plan.	0.5	Lansdowne	Attorney
			Dennis	
June 3, 2021	Review and edit motion for partial summary judgment.	1.92	Lansdowne	Attorney
June 4, 2021	Revise motion for partial summary judgment.	2.5	Kevin Hulick	Attorney
June 7, 2021	Edit motion for partial summary judgment.	0.17	Stuart Scott	Attorney
	Email to PSC re:			
June 7, 2021		0.25	Stuart Scott	Attorney
June 7, 2021	review and comment on revised Notice plan; email defense counsel.	0.25	Stuart Scott	Attorney
June 11, 2021	Review joint proposed case management order.	0.5	Stuart Scott	Attorney
June 11, 2021	Email PSC re: joint proposed case management order.	0.17	Stuart Scott	Attorney
June 15, 2021	Review redline changes to long form notice.	0.5	Stuart Scott	Attorney
June 21, 2021	Review declaration on post card notice.	0.33	Stuart Scott	Attorney
June 21, 2021	Review post card notice.	0.08	Stuart Scott	Attorney
June 21, 2021	Review long form notice.	0.33	Stuart Scott	Attorney
August 3, 2021	PSC call regarding .	1.17	Stuart Scott	Attorney
August 3, 2021	Edit Rule 30(b)(6) notice.	0.17	Stuart Scott	Attorney
August 5, 2021	Edit notice for Rule(b)(6) deposition.	1.25	Stuart Scott	Attorney
August 6, 2021	Edit Plaintiffs' motion for partial summary judgment.	0.5	Stuart Scott	Attorney
August 6, 2021	Edit Plaintiffs' motion for partial summary judgment.	2	Stuart Scott	Attorney
August 12, 2021	Edit Rule 30(b)(6) notice.	0.33	Stuart Scott	Attorney
			Dennis	
August 12, 2021	Review and edit motion for summary judgment.	1.08	Lansdowne	Attorney
August 13, 2021	PSC call re:	1	Stuart Scott	Attorney
August 16, 2021	Edit 4th set of requests for production.	0.42	Stuart Scott	Attorney
August 19, 2021	Email PSC re:	0.33	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
			Dennis	
August 24, 2021	Review web site and email notice. Provide edits to Mr. Scott.	0.2	Lansdowne	Attorney
September 3, 2021	Prepare for bi-weekly PSC meeting; review discovery letters.	0.5	Stuart Scott	Attorney
September 3, 2021	PSC meeting.	0.67	Stuart Scott	Attorney
September 8, 2021	Meet and confer.	1	Stuart Scott	Attorney
September 13, 2021	Updating Plaintiffs' responses to discovery requests.	1.17	Stuart Scott	Attorney
September 15, 2021	Review Defendant's discovery responses.	0.75	Stuart Scott	Attorney
September 17, 2021	PSC bi-weekly call.	1.2	Stuart Scott	Attorney
	Review Defendant's responses to 3rd and 4th set of RFPs, 5th set of ROGs, and response			
September 22, 2021	to Rule 30(b)(6) notice.	0.75	Stuart Scott	Attorney
			Dennis	
September 30, 2021	Exchange emails with PSC re: ; research .	0.75	Lansdowne	Attorney
October 1, 2021	Review Defendant's motion for bifurcation.	0.5	Stuart Scott	Attorney
October 1, 2021	Email to PSC regarding	0.4	Stuart Scott	Attorney
	Prepare for for PSC meeting; review response to Rule 30(b)(6) notice; bifurcation motion;			
October 3, 2021	relevant case law; and agenda from last meeting.	1.33	Stuart Scott	Attorney
			Dennis	
October 4, 2021	Review exhibit to Subpoena to Oliver Wyman.	0.2	Lansdowne	Attorney
October 4, 2021	Bi-weekly PSC call.	1.42	Stuart Scott	Attorney
October 4, 2021	Draft response to motion to bifurcate.	1.5	Stuart Scott	Attorney
October 5, 2021	Edit email responding to defense counsel on Rule 30(b)(6) topics.	0.33	Stuart Scott	Attorney
October 5, 2021	Research .	0.75	Stuart Scott	Attorney
October 5, 2021	Draft opposition to Defendant motion for trial plan.	0.67	Stuart Scott	Attorney
October 7, 2021	Call with defense counsel re: meet and confer on Rule 30(b)(6) deposition.	0.5	Stuart Scott	Attorney
October 12, 2021	Meet and confer call on Rule 30(b)(6) topics.	0.25	Stuart Scott	Attorney
October 12, 2021	Review deficiency letter to defense counsel.	0.33	Stuart Scott	Attorney
October 12, 2021	Call with Michael Simkovic.	1	Stuart Scott	Attorney
October 13, 2021	Email to PSC re:	0.25	Stuart Scott	Attorney
October 14, 2021	Review and edit response to trial plan.	0.75	Stuart Scott	Attorney
October 15, 2021	PSC bi-weekly call.	0.5	Stuart Scott	Attorney
October 15, 2021	Edit brief in opposition to Defendant's motion for trial plan.	0.5	Stuart Scott	Attorney
October 20, 2021	Call with as potential expert.	0.5	Stuart Scott	Attorney
October 21, 2021	Edit brief in opposition to Defendant's motion for travel plan.	0.5	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
			Dennis	
October 21, 2021	Research potential experts.	0.75	Lansdowne	Attorney
October 27, 2021	Emails with PSC discussing retainer and scope of work for expert.	0.75	Stuart Scott	Attorney
October 28, 2021	Edit retainer agreement and email red-lined retainer agreement to Michael Simkovic.	0.75	Stuart Scott	Attorney
October 28, 2021	Review of materials to send expert Michael Simkovic.	0.33	Stuart Scott	Attorney
October 29, 2021	Research .	0.2	Kevin Hulick	Attorney
October 29, 2021	Discuss .	0.2	Kevin Hulick	Attorney
			Dennis	
October 29, 2021	Call with PSC re: ; conduct expert research.	1.08	Lansdowne	Attorney
November 2, 2021	Prepare for Rule 30(b)(6) deposition.	3	Stuart Scott	Attorney
November 3, 2021	Prepare for Rule 30(b)(6) deposition.	1.5	Stuart Scott	Attorney
November 3, 2021	Review documents to prepare for Rule 30(B)(6) deposition.	1	Kevin Hulick	Attorney
November 3, 2021	Prepare for Rule 30(b)(6) deposition.	1.75	Stuart Scott	Attorney
November 4, 2021	Prepare for Rule 30(b)(6) deposition.	2.5	Stuart Scott	Attorney
			Dennis	
November 5, 2021	Review Defendant's Reply ISO Class Action Trial Plan.	0.2	Lansdowne	Attorney
November 5, 2021	Prepare for and take Rule 30(b)(6) deposition.	7.5	Stuart Scott	Attorney
November 7, 2021	Review Defendant's reply for trial plan.	0.33	Stuart Scott	Attorney
November 12, 2021	Bi-weekly PSC call.	1	Stuart Scott	Attorney
November 29, 2021	Bi-weekly PSC call.	1	Stuart Scott	Attorney
November 30, 2021	Review Mendelsohn deposition transcript.	0.53	Stuart Scott	Attorney
December 3, 2021	Prepare notice section for demand letter.	2.75	Stuart Scott	Attorney
December 3, 2021	Update notice section of demand letter.	1	Kevin Hulick	Attorney
December 9, 2021	Zoom meeting with Mr. Simkovic to discuss his initial review of materials.	0.8	Kevin Hulick	Attorney
December 9, 2021	Call with Mr. Simkovic.	0.75	Stuart Scott	Attorney
December 10, 2021	Review Plaintiffs' supplemental discovery responses.	0.33	Stuart Scott	Attorney
December 14, 2021	Bi-weekly PSC call.	0.5	Stuart Scott	Attorney
December 15, 2021	Email Ms. Haac re:	0.42	Stuart Scott	Attorney
December 16, 2021	Call with defense counsel to discuss production and discovery cutoff issues.	0.42	Stuart Scott	Attorney
December 16, 2021	Review and analyze Simkovic email re: TILA	0.83	Stuart Scott	Attorney
December 16, 2021	Email Mr. Simkovic	0.5	Stuart Scott	Attorney
December 17, 2021	Research .	1.5	Stuart Scott	Attorney
December 17, 2021	Email Mr. Simkovic re:	0.17	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
December 17, 2021	Zoom meeting with Disco e-discovery platform.	1	Stuart Scott	Attorney
			Dennis	
December 17, 2021	Review and edit Plaintiffs' responses to discovery.	0.2	Lansdowne	Attorney
December 22, 2021	PSC call to go over	1	Stuart Scott	Attorney
December 22, 2021	Zoom call with Professor Simkovic.	1.2	Stuart Scott	Attorney
			Dennis	
December 22, 2021	Review proposed document review protocol.	1	Lansdowne	Attorney
December 23, 2021	Review Professor Simkovic's report; email Mr. Simkovic regarding same.	2.5	Stuart Scott	Attorney
December 24, 2021	Review draft expert report.	1.5	Stuart Scott	Attorney
December 26, 2021	Review Professor Simkovic's draft report; email Simkovic proposed edits.	5.2	Stuart Scott	Attorney
			Dennis	
December 27, 2021	Review draft expert report.	1.08	Lansdowne	Attorney
December 28, 2021	Document review.	1	Stuart Scott	Attorney
December 28, 2021	Document review.	2.5	Stuart Scott	Attorney
			Dennis	
December 29, 2021	Review new draft of expert report; provide comments.	2	Lansdowne	Attorney
			Dennis	
December 30, 2021	Document review.	1.83	Lansdowne	Attorney
December 31, 2021	Document review.	5.58	Stuart Scott	Attorney
December 31, 2021	Call with Expert Professor Simkovic.	0.75	Stuart Scott	Attorney
			Dennis	
December 31, 2021	Document review.	3	Lansdowne	Attorney
			Dennis	
December 31, 2021	Conduct expert research.	1	Lansdowne	Attorney
January 1, 2022	Document review.	3.5	Stuart Scott	Attorney
January 2, 2022	Document review.	3	Stuart Scott	Attorney
January 3, 2022	Document review.	1.5	Stuart Scott	Attorney
January 6, 2022	Call with defense counsel.	0.25	Stuart Scott	Attorney
January 6, 2022	Call with Professor Simkovic to discuss report.	0.75	Stuart Scott	Attorney
January 6, 2022	Review second draft report from Professor Simkovic.	1.33	Stuart Scott	Attorney
January 7, 2022	Bi-weekly call with PSC.	0.83	Stuart Scott	Attorney
			Dennis	
January 8, 2022	Review Simkovic draft report.	2.75	Lansdowne	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
			Dennis	
January 8, 2022	Review and edit Plaintiffs' summary judgment brief.	2.5	Lansdowne	Attorney
			Dennis	
January 9, 2022	Review and edit summary judgment brief.	1.08	Lansdowne	Attorney
			Dennis	
January 9, 2022	Review draft expert report from Professor Simkovic.	1.5	Lansdowne	Attorney
January 12, 2022	Review Professor Simkovic report.	1.33	Stuart Scott	Attorney
	Review expert report; conference call with PSC discussing		Dennis	
January 14, 2022		1.75	Lansdowne	Attorney
January 14, 2022	Conference call amongst the PSC to discuss	0.75	Stuart Scott	Attorney
January 15, 2022	Email PSC regarding	1	Stuart Scott	Attorney
			Dennis	
January 20, 2022	Research for experts.	1.08	Lansdowne	Attorney
			Dennis	
January 20, 2022	Review documents.	0.75	Lansdowne	Attorney
January 21, 2022	PSC meeting to discuss	1.83	Stuart Scott	Attorney
January 21, 2022	Email PSC on .	0.88	Stuart Scott	Attorney
			Dennis	
January 21, 2022	Review caselaw on	0.75	Lansdowne	Attorney
January 23, 2022	Email to expert re:	0.75	Stuart Scott	Attorney
January 24, 2022	Document review.	0.5	Stuart Scott	Attorney
			Dennis	
January 25, 2022	Review draft of motion for summary judgment; Discussion with Mr. Scott re: same.	1.08	Lansdowne	Attorney
January 28, 2022	Call with Professor Simkovic.	1	Stuart Scott	Attorney
			Dennis	
January 29, 2022	Document review.	1	Lansdowne	Attorney
January 29, 2022	Document review.	4.5	Stuart Scott	Attorney
January 30, 2022	Edit motion for summary judgment; email PSC re: same.	2.08	Stuart Scott	Attorney
January 30, 2022	Review Professor Simkovic report.	2.42	Stuart Scott	Attorney
			Dennis	
January 30, 2022	Document review.	0.75	Lansdowne	Attorney
January 31, 2022	Review Professor Simkovic report.	1.75	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
			Dennis	
February 8, 2022	PSC call re:	0.55	Lansdowne	Attorney
	Prepare for and attend PSC call to discuss			
February 8, 2022		1	Stuart Scott	Attorney
February 8, 2022	Review Plaintiffs' Motion for Summary Judgment.	0.5	Stuart Scott	Attorney
February 9, 2022	Review updated report; email Professor Simkovic on same.	0.75	Stuart Scott	Attorney
			Dennis	
February 11, 2022	Edit Motion for Summary Judgment.	0.75	Lansdowne	Attorney
February 17, 2022	Review and edit Plaintiffs' motion for summary judgment.	0.75	Stuart Scott	Attorney
February 18, 2022	Bi-weekly PSC call.	1	Stuart Scott	Attorney
February 18, 2022	Review updated report from Professor Simkovic.	0.58	Stuart Scott	Attorney
February 18, 2022	Call with Professor Simkovic.	1.5	Stuart Scott	Attorney
February 18, 2022	Discussion with Mr. Scott on .	0.1	Kevin Hulick	Attorney
February 19, 2022	Edit motion for summary judgment.	0.25	Stuart Scott	Attorney
February 19, 2022	Review document production and privilege log.	1.5	Kevin Hulick	Attorney
February 21, 2022	PSC call to discuss	0.5	Stuart Scott	Attorney
February 21, 2022	Call defense counsel to discuss pretrial.	0.33	Stuart Scott	Attorney
February 21, 2022	Review privilege log.	5	Kevin Hulick	Attorney
February 22, 2022	Conference with court.	0.5	Stuart Scott	Attorney
February 22, 2022	PSC call.	1	Stuart Scott	Attorney
February 22, 2022	Review privilege log.	6	Kevin Hulick	Attorney
February 23, 2022	Review privilege log.	4.5	Kevin Hulick	Attorney
February 24, 2022	Review privilege log and draft summary memo.	1	Kevin Hulick	Attorney
			Dennis	
February 24, 2022	Review and edit motion for summary judgment.	1.25	Lansdowne	Attorney
			Dennis	
February 25, 2022	document review of hot documents.	1.83	Lansdowne	Attorney
			Dennis	
February 26, 2022	Review memo on ; email PSC re: same.	1	Lansdowne	Attorney
February 27, 2022	Review Professor Simkovic's report.	0.5	Stuart Scott	Attorney
			Dennis	
March 2, 2022	Conference with potential banking expert; prepare for same.	1	Lansdowne	Attorney
March 3, 2022	Research .	0.9	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
March 3, 2022	Document review.	0.4	Kevin Hulick	Attorney
March 3, 2022	Review defense productions.	0.7	Kevin Hulick	Attorney
March 4, 2022	PSC bi-weekly call.	0.58	Stuart Scott	Attorney
	PSC call regarding . Revi	ew	Dennis	
March 4, 2022	witness data.	0.75	Lansdowne	Attorney
March 4, 2022	Review defense document productions.	3.5	Kevin Hulick	Attorney
March 8, 2022	Document review.	1	Kevin Hulick	Attorney
March 9, 2022	Document review.	2.2	Kevin Hulick	Attorney
March 11, 2022	Draft deficiency letter on privilege log.	0.7	Kevin Hulick	Attorney
March 12, 2022	review privilege log deficiency letter	0.2	Kevin Hulick	Attorney
March 15, 2022	Document review.	4.2	Kevin Hulick	Attorney
March 15, 2022	Review and edit demand letter.	0.5	Stuart Scott	Attorney
March 16, 2022	Document review.	0.8	Kevin Hulick	Attorney
March 16, 2022	Edit demand letter.	0.25	Stuart Scott	Attorney
March 17, 2022	Review motion for summary judgment.	0.5	Kevin Hulick	Attorney
March 17, 2022	Attend PSC call.	1.5	Stuart Scott	Attorney
	Attend PSC team call to discuss			
March 17, 2022		1.6	Kevin Hulick	Attorney
March 18, 2022	Document review.	2.4	Kevin Hulick	Attorney
March 21, 2022	Document review.	0.8	Kevin Hulick	Attorney
March 22, 2022	Document review.	0.5	Kevin Hulick	Attorney
March 22, 2022	Review privilege log to assess validity of privilege assertions.	5	Kevin Hulick	Attorney
March 25, 2022	Document review.	0.4	Kevin Hulick	Attorney
March 25, 2022	Update deficiency letter to include references to redacted documents.	4	Kevin Hulick	Attorney
March 30, 2022	Research issue regarding	0.3	Kevin Hulick	Attorney
March 31, 2022	Email PSC on	0.2	Kevin Hulick	Attorney
April 1, 2022	Review motion for summary judgment.	0.4	Kevin Hulick	Attorney
April 1, 2022	Update deficiency letter.	0.2	Kevin Hulick	Attorney
April 1, 2022	Bi-weekly team call.	0.5	Kevin Hulick	Attorney
April 7, 2022	Review documents for Erhardt deposition.	1.5	Kevin Hulick	Attorney
April 15, 2022	Gather and review potential exhibits for Erhardt deposition.	2.5	Kevin Hulick	Attorney
April 15, 2022	Phone call with co-counsel regarding	0.2	Kevin Hulick	Attorney
April 15, 2022	Email correspondence with co-counsel regarding	0.2	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	]	Hours	<u>Name</u>	Role
April 20, 2022	Prepare for Erhardt deposition.	1.5		Stuart Scott	Attorney
April 22, 2022	Prepare for Erhardt Deposition.	1		Stuart Scott	Attorney
April 26, 2022	Review documents for Erhardt deposition.	2.5		Kevin Hulick	Attorney
April 26, 2022	Prepare for Erhardt deposition.	4.2:	5	Stuart Scott	Attorney
April 27, 2022	Prepare for Erhardt deposition.	1.5		Stuart Scott	Attorney
April 27, 2022	Travel to Cincinnati for Erhardt deposition.	5.2		Stuart Scott	Attorney
April 28, 2022	Depose Mr. Erhardt; attend Mr. Carpenter's deposition.	8		Stuart Scott	Attorney
April 28, 2022	Return travel to Cleveland.	5		Stuart Scott	Attorney
April 29, 2022	Email PSC team re:	0.3		Stuart Scott	Attorney
April 29, 2022	PSC Meeting	1		Stuart Scott	Attorney
May 3, 2022	PSC call to discuss	0.6		Stuart Scott	Attorney
May 13, 2022	Attend Howard deposition.	6		Stuart Scott	Attorney
May 17, 2022	Status conference with court.	0.42	2	Stuart Scott	Attorney
May 18, 2022	PSC meeting to discuss .	0.7:	5	Stuart Scott	Attorney
May 20, 2022	Email to PSC regarding .	0.5		Stuart Scott	Attorney
May 26, 2022	Review defense expert reports.	1.2		Stuart Scott	Attorney
May 26, 2022	Email PSC regarding .	0.4		Stuart Scott	Attorney
May 27, 2022	PSC bi-weekly call.	0.5		Stuart Scott	Attorney
May 27, 2022	Review defense expert reports.	1		Stuart Scott	Attorney
June 1, 2022	Research expert Charles Grice	8		Hudson Curtin	Law Clerk
June 1, 2022	Review Grice report.	0.73	5	Stuart Scott	Attorney
June 1, 2022	Email PSC regarding .	0.42		Stuart Scott	Attorney
June 2, 2022	Research Charles Grice.	7.5		Hudson Curtin	Law Clerk
June 2, 2022	Call with Professor Simkovic.	1.2		Stuart Scott	Attorney
June 2, 2022	PSC call to discuss	0.73	5	Stuart Scott	Attorney
June 2, 2022	Review expert research materials and discuss with Mr. C			Kevin Hulick	Attorney
June 3, 2022	Research Charles Grice.	6.22	2	Hudson Curtin	Law Clerk
June 3, 2022	Email PSC on .	1.5		Stuart Scott	Attorney
June 3, 2022	Review research on Mr. Grice.	0.73	_	Stuart Scott	Attorney
June 3, 2022	Review prior Grice report regarding APR.	0.2		Kevin Hulick	Attorney
				Dennis	
June 3, 2022	Review expert reports from defense.	1.83	_	Lansdowne	Attorney
June 12, 2022	Review Simkovic rebuttal report.	0.5		Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role
June 17, 2022	Bi-weekly PSC call.	1.1	Stuart Scott	Attorney
			Dennis	
June 17, 2022	Attend portion of PSC call to discuss .	0.63	Lansdowne	Attorney
June 22, 2022	Call with Mr. Simkovic and review of rebuttal report.	0.4	Stuart Scott	Attorney
June 24, 2022	Review expert reports and serve on opposing counsel.	0.3	Kevin Hulick	Attorney
July 4, 2022	Review defense rebuttal reports.	2.5	Stuart Scott	Attorney
July 5, 2022	Review expert reports.	0.28	Kyra Wieber	Law Clerk
July 5, 2022	PSC call regarding	0.7	Stuart Scott	Attorney
			Dennis	
July 5, 2022	PSC call discussing	0.67	Lansdowne	Attorney
July 6, 2022	Review expert rebuttal reports.	0.5	Kyra Wieber	Law Clerk
July 8, 2022	Analyze defense rebuttal reports.	1.7	Stuart Scott	Attorney
July 18, 2022	Review Simkovic reports.	0.75	Stuart Scott	Attorney
July 19, 2022	Analyze expert reports for Simkovic deposition preparation.	0.75	Stuart Scott	Attorney
July 20, 2022	Analyze TILA issue for deposition prep for Professor Simkovic.	0.75	Stuart Scott	Attorney
July 24, 2022	Prepare for Green deposition.	2.5	Stuart Scott	Attorney
July 25, 2022	Prepare for Green deposition.	2.5	Stuart Scott	Attorney
July 26, 2022	Email Professor Simkovic discussing his deposition.	1.5	Stuart Scott	Attorney
July 27, 2022	Prepare for Green deposition.	1.2	Stuart Scott	Attorney
July 28, 2022	Research expert witnesses.	0.42	Kyra Wieber	Law Clerk
July 28, 2022	Travel to New York City to meet with Professor Simkovic.	4.5	Stuart Scott	Attorney
July 28, 2022	Dinner with Professor Simkovic to discuss deposition.	2	Stuart Scott	Attorney
July 29, 2022	Meet with Professor Simkovic to prepare for deposition.	7	Stuart Scott	Attorney
July 29, 2022	Return travel to Cleveland from New York City.	4	Stuart Scott	Attorney
July 30, 2022	Prepare for Green deposition.	1	Stuart Scott	Attorney
July 31, 2022	Prepare for Green deposition.	5	Stuart Scott	Attorney
August 1, 2022	Prepare for Green deposition.	2	Stuart Scott	Attorney
August 1, 2022	Prepare for Green deposition.	5.25	Stuart Scott	Attorney
August 2, 2022	Prepare for Green deposition.	3.5	Stuart Scott	Attorney
August 2, 2022	Prepare for Green deposition.	4.5	Stuart Scott	Attorney
August 4, 2022	Research .	1.1	Stuart Scott	Attorney
August 4, 2022	Meet with Mr. Scott to discuss .	0.4	Kevin Hulick	Attorney
August 4, 2022	Research .	0.5	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	<u>Hours</u>	<u>Name</u>	Role
August 7, 2022	Exchange emails with Professor Simkovic relating to	0.75	Stuart Scott	Attorney
			Dennis	
August 8, 2022	Call with co-counsel to discuss	1.08	Lansdowne	Attorney
August 9, 2022	Meeting with Professor Simkovic to prepare for deposition.	3.5	Stuart Scott	Attorney
August 9, 2022	Review Green deposition transcript.	1.5	Stuart Scott	Attorney
August 10, 2022	Review Green deposition transcript.	1	Stuart Scott	Attorney
August 10, 2022	Travel to New York City for Simkovic deposition.	2.5	Stuart Scott	Attorney
August 11, 2022	Attend Simkovic deposition.		Stuart Scott	Attorney
August 11, 2022	Return Travel from New York City.	3	Stuart Scott	Attorney
			Dennis	
August 12, 2022	Review information on Simkovic deposition.	0.45	Lansdowne	Attorney
August 14, 2022	PSC call to discuss	1	Stuart Scott	Attorney
August 14, 2022	22 Exchange emails with Professor Simkovic regarding .		Stuart Scott	Attorney
August 19, 2022	Review Defendant's motion for summary judgment.	0.2	Kevin Hulick	Attorney
August 20, 2022	Review Defendant's motion for summary judgment.		Kevin Hulick	Attorney
August 20, 2022	2 Review Defendant's motion for summary judgment.		Stuart Scott	Attorney
August 21, 2022	Email PSC regarding .	1.4	Stuart Scott	Attorney
			Dennis	
August 24, 2022	Review Defendant's motion for summary judgment.	1.25	Lansdowne	Attorney
August 25, 2022	Analyze Defendant's motion for summary judgment.	1.75	Stuart Scott	Attorney
August 25, 2022	PSC call to discuss	0.5	Stuart Scott	Attorney
			Dennis	
August 25, 2022	Call with co-counsel to discuss response to Defendant's motion for summary judgment.	0.5	Lansdowne	Attorney
September 4, 2022	Draft response to Defendant's motion for summary judgment.	3.5	Stuart Scott	Attorney
September 5, 2022	Draft response to Defendant's motion for summary judgment.	1.5	Stuart Scott	Attorney
September 6, 2022	Draft reply to motion for summary judgment.	3.1	Stuart Scott	Attorney
September 6, 2022	Draft response to Defendant's motion for summary judgment.	1.75	Stuart Scott	Attorney
September 7, 2022	Draft response to Defendant's motion for summary judgment.	1.75	Stuart Scott	Attorney
September 7, 2022	Update introductory section to response to Defendant's motion for summary judgment.	1.2	Kevin Hulick	Attorney
September 8, 2022	Draft response to Defendant's motion for summary judgment.	1.25	Stuart Scott	Attorney
September 9, 2022	Drafting response to Defendant's motion for summary judgment.	1.2	Stuart Scott	Attorney
September 13, 2022	Review Simkovic errata sheet.	0.35	Stuart Scott	Attorney
September 16, 2022	Prepare for PSC call.	0.5	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
September 16, 2022	PSC call to discuss	0.4	Stuart Scott	Attorney
September 16, 2022	Biweekly PSC call.	0.4	Kevin Hulick	Attorney
September 16, 2022	Meet with Mr. Scott regarding .	0.7	Kevin Hulick	Attorney
September 16, 2022	Review Defendant's motion for summary judgment.	0.5	Kevin Hulick	Attorney
September 19, 2022	Review for reply to motion for summary judgment.	0.6	Stuart Scott	Attorney
September 21, 2022	Update response to Defendant's motion for summary judgment.	4	Kevin Hulick	Attorney
September 21, 2022	Edit to response to Defendant's motion for summary judgment.	0.75	Stuart Scott	Attorney
September 22, 2022	ptember 22, 2022 Meet with Mr. Scott to discuss .		Kevin Hulick	Attorney
	Update response to Defendant's motion for summary judgment based on Mr. Scott's			
September 22, 2022	comments.	4.5	Kevin Hulick	Attorney
September 23, 2022	ptember 23, 2022 Edit response to Defendant's motion for summary judgment.		Stuart Scott	Attorney
September 23, 2022	Update response to Defendant's motion for summary judgment.	0.6	Kevin Hulick	Attorney
September 28, 2022	Review and edit response to Defendant's motion for summary judgment.	1.25	Stuart Scott	Attorney
September 28, 2022	Update response to Defendant's motion for summary judgment.	2	Kevin Hulick	Attorney
	Exchange emails with co-counsel discussing			
September 28, 2022		0.4	Kevin Hulick	Attorney
September 29, 2022	Call with PSC to discuss	1.4	Stuart Scott	Attorney
September 29, 2022	PSC call to discuss	1.4	Kevin Hulick	Attorney
September 29, 2022	Update response to Defendant's motion for summary judgment.	3.6	Kevin Hulick	Attorney
September 29, 2022	Review response to Defendant's motion for summary judgment in preparation for PSC	0.3	Kevin Hulick	Attorney
			Dennis	
September 29, 2022	Review and edit response to Defendant's motion for summary judgment.	1.83	Lansdowne	Attorney
September 30, 2022	Edit response to Defendant's motion for summary judgment.	3.75	Stuart Scott	Attorney
September 30, 2022	Discussion with Mr. Scott	0.4	Kevin Hulick	Attorney
September 30, 2022	Review response to Defendant's motion for summary judgment.	0.5	Kevin Hulick	Attorney
			Dennis	
September 30, 2022	Review edits to response to Defendant's motion for summary judgment.	0.45	Lansdowne	Attorney
October 3, 2022	Update response to Defendant's motion for summary judgment.	1.5	Kevin Hulick	Attorney
October 4, 2022	Review Defendant's response to motion for summary judgment.	1.2	Stuart Scott	Attorney
October 4, 2022	Email PSC with	1.5	Stuart Scott	Attorney
October 4, 2022	Review Defendant's response to motion for summary judgment.	0.6	Kevin Hulick	Attorney
October 7, 2022	PSC weekly call discussing .	1	Stuart Scott	Attorney
October 7, 2022	PSC call to discuss	1	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
October 7, 2022	Review Defendant's response to motion for summary judgment.	0.5	Kevin Hulick	Attorney
	Analyze of Defendant's response to summary judgment motion; outline points to make ir	1		
October 16, 2022	reply.	2.5	Stuart Scott	Attorney
October 18, 2022	Edit reply in support of motion for summary judgment.	1.5	Stuart Scott	Attorney
October 20, 2022	Edit reply to motion for summary judgment.	1	Stuart Scott	Attorney
October 20, 2022	PSC call to discuss	1	Stuart Scott	Attorney
			Dennis	
October 23, 2022	Review and edit reply to motion for summary judgment.	1.08	Lansdowne	Attorney
			Dennis	
October 24, 2022	Review and edit Reply brief	1.25	Lansdowne	Attorney
October 25, 2022	Update reply to motion for summary judgment.	1.5	Kevin Hulick	Attorney
October 27, 2022	Review data from expert.	0.6	Kevin Hulick	Attorney
October 31, 2022	Edit to reply to motion for summary judgment.	1.1	Stuart Scott	Attorney
November 2, 2022	Update reply to motion for summary judgment.	1.8	Kevin Hulick	Attorney
November 3, 2022	r 3, 2022 Review Defendant's reply to motion for summary judgment.		Stuart Scott	Attorney
December 18, 2022	pember 18, 2022 Edit demand letter.		Stuart Scott	Attorney
December 22, 2022	PSC bi-weekly call.	1.2	Stuart Scott	Attorney
			Dennis	
December 22, 2022	Prepare for and attend PSC call regarding updated demand letter and trial preparation.	1.25	Lansdowne	Attorney
January 6, 2023	PSC call to discuss trial preparation.	1.25	Stuart Scott	Attorney
January 6, 2023	Biweekly PSC call.	1.2	Kevin Hulick	Attorney
January 6, 2023	Review testimony in anticipation of trial.	2.5	Stuart Scott	Attorney
			Dennis	
January 6, 2023	Review testimony in anticipation of trial.	1.25	Lansdowne	Attorney
January 8, 2023	Drafting opening for review by Deb Miller	3.42	Stuart Scott	Attorney
January 12, 2023	Call with co-counsel to discuss .	1	Stuart Scott	Attorney
January 12, 2023	Review depositions for trial preparation.	2.5	Kevin Hulick	Attorney
January 13, 2023	PSC call to discuss	1	Stuart Scott	Attorney
January 14, 2023	Prepare proof chart	3.5	Kevin Hulick	Attorney
January 17, 2023	Review draft proof chart.	0.8	Kevin Hulick	Attorney
January 18, 2023	Review Harrison deposition for trial preparation.	1	Kevin Hulick	Attorney
January 20, 2023	PSC team meeting.	1	Kevin Hulick	Attorney
January 20, 2023	Prepare list of outstanding action items.	0.4	Kevin Hulick	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
January 21, 2023	Meeting with Mr. Scott to discuss .	0.4	Kevin Hulick	Attorney
January 24, 2023	Review and digest Carpenter deposition.	1.33	Stuart Scott	Attorney
January 26, 2023	Weekly trial prep call.	1.17	Stuart Scott	Attorney
January 26, 2023	Review Erhardt deposition.	0.6	Kevin Hulick	Attorney
January 27, 2023	PSC team call and prepare for same.	1.75	Stuart Scott	Attorney
January 27, 2023	PSC team call.	1.7	Kevin Hulick	Attorney
January 27, 2023	Review Erhardt deposition and highlight for trial.	1.5	Kevin Hulick	Attorney
January 30, 2023	Digest Green deposition.	2.75	Stuart Scott	Attorney
January 30, 2023	Review depositions for trial.	1.5	Kevin Hulick	Attorney
February 3, 2023	Weekly PSC trial prep call.	1.25	Stuart Scott	Attorney
February 3, 2023	Weekly PSC call.	1.2	Kevin Hulick	Attorney
February 3, 2023	Review depositions for trial.	0.3	Kevin Hulick	Attorney
February 4, 2023	Update proof chart.	0.4	Kevin Hulick	Attorney
February 15, 2023	update proof chart	0.8	Kevin Hulick	Attorney
February 17, 2023	Call with co-counsel to discuss .		Stuart Scott	Attorney
February 17, 2023	2023 Weekly PSC trial prep call.		Stuart Scott	Attorney
			Dennis	
February 19, 2023	Review and edit motion in limine.	1.08	Lansdowne	Attorney
February 21, 2023	Edit Grice & Green motion in limine.	2.33	Stuart Scott	Attorney
			Dennis	
February 21, 2023	Review and edit motions in limine.	1.25	Lansdowne	Attorney
February 21, 2023	Review and edit motions in limine.	1	Kevin Hulick	Attorney
February 22, 2023	Review defense motions in limine.	0.6	Kevin Hulick	Attorney
February 24, 2023	Weekly PSC meeting.	1.17	Stuart Scott	Attorney
February 24, 2023	Weekly PSC meeting.	1.2	Kevin Hulick	Attorney
February 24, 2023	Meet with Mr. Scott to discuss	0.2	Kevin Hulick	Attorney
February 26, 2023	Update motion in limine.	0.5	Stuart Scott	Attorney
February 26, 2023	Outline response to Oliver and Simkovic motion in limine.	0.5	Stuart Scott	Attorney
February 28, 2023	Draft opposition to Oliver/Simkovic Daubert motion.	5	Kevin Hulick	Attorney
March 1, 2023	Edit jury instructions and interrogatories.	0.75	Stuart Scott	Attorney
March 1, 2023	Draft opposition to oliver/simkovic daubert motion	2.5	Kevin Hulick	Attorney
March 2, 2023	Edit response to Oliver and Simkovic Daubert motion.	1	Stuart Scott	Attorney
March 2, 2023	Edit list of proposed motions in limine.	0.5	Stuart Scott	Attorney

<u>Date</u>	Notes	Hours	Name	Role
March 2, 2023	review jury instructions.	1	Stuart Scott	Attorney
March 2, 2023	Draft jury instructions and interrogatories.	4	Kevin Hulick	Attorney
March 2, 2023	Review hot documents.	0.8	Kevin Hulick	Attorney
March 2, 2023	Update opposition to Simkovic and Oliver Daubert motion.	0.7	Kevin Hulick	Attorney
			Dennis	
March 2, 2023	Review and edit motion in limine briefing.	2.5	Lansdowne	Attorney
March 3, 2023	Travel to and back from Washington for trial prep meeting	6	Stuart Scott	Attorney
March 3, 2023	Trial prep meeting at Tycko and Zavareei.	7	Stuart Scott	Attorney
March 3, 2023	Travel to and back from DC for trial team meeting.	6	Kevin Hulick	Attorney
March 3, 2023	Trial prep meeting.	7	Kevin Hulick	Attorney
			Dennis	
March 3, 2023	Trial prep meeting	7	Lansdowne	Attorney
			Dennis	
March 3, 2023	travel to and back from Washington, DC for trial prep meeting.	6	Lansdowne	Attorney
			Dennis	
March 6, 2023	Review responses to motions in limine.	0.5	Lansdowne	Attorney
March 7, 2023	Edits to simkovic and Oliver MIL response	0.5	Stuart Scott	Attorney
March 7, 2023	Review response to Oliver/Simkovic Daubert motion.	0.2	Kevin Hulick	Attorney
March 8, 2023	revise jury instructions and jury interrogatories and verdict forms.	0.9	Kevin Hulick	Attorney
March 8, 2023	Email PSC regarding .	1.25	Stuart Scott	Attorney
			Dennis	
March 8, 2023	Review responses to motions in limine; review proposed jury interrogatories.	1.92	Lansdowne	Attorney
March 10, 2023	Review Defendant responses to motions in limine.	0.75	Stuart Scott	Attorney
March 10, 2023	Weekly PSC call; prepare for same.	2.25	Stuart Scott	Attorney
March 10, 2023	Review cases cited in Defendant's briefing.	1.5	Stuart Scott	Attorney
March 10, 2023	Weekly TSC call	2.1	Kevin Hulick	Attorney
			Dennis	
March 10, 2023	Review exhibit list and motions in limine.	1.25	Lansdowne	Attorney
March 11, 2023	Draft TILA jury instructions; review caselaw on	2	Kevin Hulick	Attorney
March 12, 2023	Review Jury instructions for TILA claim.	0.75	Stuart Scott	Attorney
			Dennis	
March 12, 2023	Review materials related to Professor Simkovic to prepare for testimony.	5.75	Lansdowne	Attorney
March 13, 2023	Review jury instructions and interrogatories.	1.33	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
March 13, 2023	Update jury interrogatories and instructions based on TILA claim.	0.7	Kevin Hulick	Attorney
			Dennis	
March 13, 2023	Edit outline of Simkovic direct exam.	1.5	Lansdowne	Attorney
March 14, 2023	Update jury instructions and interrogatories.	0.5	Stuart Scott	Attorney
			Dennis	
March 14, 2023	Prepare for Simkovic testimony.	2.75	Lansdowne	Attorney
March 15, 2023	Draft motion in limine regarding variable rate loans.	0.75	Stuart Scott	Attorney
March 15, 2023	Review jury instructions.	1.75	Stuart Scott	Attorney
March 15, 2023	Draft memo on .	1.67	Stuart Scott	Attorney
March 15, 2023	Review Howard testimony designations.	0.5	Stuart Scott	Attorney
March 15, 2023	Prepare draft jury instructions and interrogatories.	3	Kevin Hulick	Attorney
March 15, 2023	Call with co-counsel regarding .	0.3	Kevin Hulick	Attorney
March 15, 2023	Review Howard deposition for trial designations.	1.8	Kevin Hulick	Attorney
March 17, 2023	Email PSC regarding .	0.25	Stuart Scott	Attorney
March 17, 2023	Review Mendelsohn designations.	0.75	Stuart Scott	Attorney
March 17, 2023	Weekly PSC trial prep call.	2.5	Stuart Scott	Attorney
			Dennis	
March 18, 2023	Prepare for and attend Simkovic prep session.	5	Lansdowne	Attorney
March 19, 2023	Review Defendant's jury instructions and designations.	1.42	Stuart Scott	Attorney
			Dennis	
March 19, 2023	Meet with Professor Simkovic to prepare for testimony.	4.58	Lansdowne	Attorney
March 20, 2023	Review and edit pretrial statements.	0.25	Stuart Scott	Attorney
March 20, 2023	Discuss pretrial order and meet and confer with co-counsel.	0.2	Kevin Hulick	Attorney
March 21, 2023	Call with Mr. Hirschhorn regarding voir dire and theme.	1	Stuart Scott	Attorney
March 21, 2023	Draft memo on .	2.75	Stuart Scott	Attorney
March 21, 2023	Research law supporting Defendant's jury instructions.	1	Stuart Scott	Attorney
March 21, 2023	Review joint pretrial statement.	0.3	Kevin Hulick	Attorney
March 21, 2023	Discuss jury instructions with Mr. Scott.	0.6	Kevin Hulick	Attorney
March 22, 2023	Edit pretrial statement.	0.25	Stuart Scott	Attorney
March 22, 2023	Email PSC on .	0.58	Stuart Scott	Attorney
March 22, 2023	PSC prep call for meet and confer.	1	Stuart Scott	Attorney
March 22, 2023	Meet and confer.	2.5	Stuart Scott	Attorney

<u>Date</u>	<u>Notes</u>	Hours	<u>Name</u>	Role	
			Dennis		
March 22, 2023	Review issues related to meet and confer.	0.75	Lansdowne	Attorney	
March 22, 2023	Call Marty Pinalus to discuss his experience with Judge Barrett's trial procedures.	0.5	Stuart Scott	Attorney	
March 22, 2023	PSC pre-call for meet and confer.	1	Kevin Hulick	Attorney	
March 22, 2023	Meet and confer with opposing counsel (had to leave early).	2.3	Kevin Hulick	Attorney	
March 22, 2023	Prepare objections to jury instructions.	0.58	Stuart Scott	Attorney	
March 23, 2023	Call with co-counsel to discuss .	1	Kevin Hulick	Attorney	
March 23, 2023	Review trial exhibits	4	Kevin Hulick	Attorney	
March 24, 2023	Call with co-counsel to go over	1	Stuart Scott	Attorney	
March 24, 2023	Call with Mr. Hirschhorn.	1	Stuart Scott	Attorney	
March 24, 2023	Call to go over	2	Stuart Scott	Attorney	
March 24, 2023	Review exhibits.	0.6	Kevin Hulick	Attorney	
March 24, 2023	PSC call on ; call with co-counsel on .	3.5	Kevin Hulick	Attorney	
March 25, 2023	Email PSC to discuss	1.33	Stuart Scott	Attorney	
March 25, 2023	Prepare opening statement for trial.	7.25	Stuart Scott	Attorney	
March 25, 2023	Email PSC with	0.5	Stuart Scott	Attorney	
March 27, 2023	Call with PSC to discuss	1.5	Stuart Scott	Attorney	
March 27, 2023	Update draft pretrial order.	1.8	Kevin Hulick	Attorney	
March 27, 2023	Call with PSC on pretrial order and trial prep (attended portion of call).	0.9	Kevin Hulick	Attorney	
March 27, 2023	Draft opening statement for trial.	3	Stuart Scott	Attorney	
March 28, 2023	Email PSC on issue of .	0.5	Stuart Scott	Attorney	
March 28, 2023	Meet with co-counsel to discuss .	0.8	Kevin Hulick	Attorney	
March 28, 2023	Draft motions in limine.	3.5	Kevin Hulick	Attorney	
March 28, 2023	Prepare opening statement.	3.5	Stuart Scott	Attorney	
March 29, 2023	Identify objections to Howard deposition transcript.	0.75	Stuart Scott	Attorney	
March 29, 2023	Review summary judgment opinion.	0.7	Kevin Hulick	Attorney	
March 29, 2023	PSC meeting to discuss	1.1	Kevin Hulick	Attorney	
March 29, 2023	Draft motions in limine.	0.9	Kevin Hulick	Attorney	
March 29, 2023	Prepare opening statement.	4.5	Stuart Scott	Attorney	
March 29, 2023	PSC call to discuss	1	Stuart Scott	Attorney	
			Dennis		
June 1, 2023	Exchange emails with PSC re:	0.5	Lansdowne	Attorney	
June 5, 2023	PSC call to discuss	1	Stuart Scott	Attorney	

<u>Date</u>	<u>Notes</u>	Hours	Name	Role
	N		Dennis	
June 6, 2023	Review emails from PSC re:	0.5	Lansdowne	Attorney
			Dennis	T
June 9, 2023	Review and edit fee petition motion.	0.75	Lansdowne	Attorney
June 12, 2023	Review and edit motion for TILA fees.	0.67	Stuart Scott	Attorney
			Dennis	
June 12, 2023	Review motion for fees.	0.5	Lansdowne	Attorney
June 12, 2023	Review fee and edit fee motion and research relevant issues.	6	Kevin Hulick	Attorney
July 5, 2023	Review opposition to attorney's fees motion.	0.3	Kevin Hulick	Attorney
July 16, 2023	Review fee motion and review relevant caselaw.	1.2	Kevin Hulick	Attorney
July 31, 2023	Review defense counsel email to court.	0.1	Kevin Hulick	Attorney
August 22, 2023	ugust 22, 2023 Call with PSC to discuss TILA fee motion.			Attorney
September 13, 2023	Research caselaw on acceptable rates in Southern District.	0.7	Kevin Hulick	Attorney
September 13, 2023	Exchange emails with PSC on	0.3	Kevin Hulick	Attorney
September 14, 2023	Exchange emails with PSC on	0.2	Kevin Hulick	Attorney
October 23, 2023	Review and edit opposition to motion to strike; conduct research for authority for opposition	3.5	Kevin Hulick	Attorney
October 25, 2023	Update Reply to Motion to Strike.	2.5	Kevin Hulick	Attorney
October 26, 2023	Update reply to motion to strike; review caselaw for authority to use in reply.	4	Kevin Hulick	Attorney
October 27, 2023	Review reply to motion to strike.	0.3	Kevin Hulick	Attorney
December 11, 2023	Attend Pre-TSC call with PSC.	1	Stuart Scott	Attorney
December 11, 2023	Attend telephonic status confernce with Court.	0.42	Stuart Scott	Attorney
December 11, 2023	Attend post-hearing call with PSC to discuss	1	Stuart Scott	Attorney
December 12, 2023	12, 2023 Zoom call with Ms. Haac and Ms. Khader regarding		Kevin Hulick	Attorney
December 14, 2023	23 Draft fee motion.		Kevin Hulick	Attorney
December 16, 2023	Draft fee motion.		Kevin Hulick	Attorney
December 17, 2023	Draft fee motion.	3.5	Kevin Hulick	Attorney
December 20, 2023	Exchange emails with co-counsel regarding	0.4	Kevin Hulick	Attorney

1356.5

## EXHIBIT 6

Dates	Received From/Paid To	Explanation	Amount	Category
8/13/2012	Stuart E. Scott, Esq.	Filing Fee	350.00	Filing Fee
8/17/2012	West Payment Center	825447505 Westlaw Research	35.08	Research
9/30/2012	Document Reproduction Charges	09/01/2012 - 09/30/2012	4.80	Document Reproducts
0/15/2012	Pacer Service Center	Q32012	0.20	Research
0/31/2012	Document Reproduction Charges	10/01/2012 - 10/31/2012	40.20	Document Reproducts
1/30/2012	Document Reproduction Charges	11/01/2012 - 11/30/2012	55.35	Document Reproduct Charges
2/11/2012	West Payment Center	826152647 Westlaw Research	333.74	Research
2/11/2012	West Payment Center	825970780 Westlaw Research	137.71	Research
2/11/2012	West Payment Center	825970780 Westlaw Research	17.35	Research
2/21/2012	Arkadin, Inc	INUS121102957	6.21	Conference Call
2/31/2012	Document Reproduction Charges	12/01/2012 - 12/31/2012	80.25	Document Reproduct Charges
1/7/2013	West Payment Center	Westlaw Research	557.85	Research
1/31/2013	Document Reproduction Charges	01/01/2013 - 01/31/2013	42.45	Document Reproduct Charges
2/1/2013	Pacer Service Center	Research	5.70	Research
2/28/2013	Document Reproduction Charges	02/01/2013 - 02/28/2013	1.05	Document Reproduct Charges
4/3/2013	PNC Bank	SES Airfare to/from Chicago - Pd Che# 048583	354.02	Travel
4/30/2013	Arkadin, Inc	Conference Call - Pd Che# 48898	22.30	Conference Call
4/30/2013	Document Reproduction	04/01/2013 - 04/30/2013	10.80	Document Reproduct

4/30/2013	Thomson Reuters - West	Research on Westlaw - Pd Che# 48893	32.70	Research
5/31/2013	Document Reproduction Charges	05/01/2013 - 05/31/2013	38.10	Document Reproduction
5/31/2013	Thomson Reuters - West	Research - Westlaw - Pd Che# 49435	87.62	Research
6/30/2013	Document Reproduction Charges	06/01/2013 - 06/30/2013	3.84	Document Reproduction Charges
7/3/2013	Pacer Service Center	Research - Pd Che# 49466	6.90	Research
7/12/2013	Stuart E. Scott, Esq.	Status Conference - Pd Che# 49535	172.20	Travel
7/15/2013	Thomson Reuters - West	Research	17.22	Research
7/19/2013	PNC Bank	Parking - SES in Cincinnati - Pd Che# 49532	10.00	Parking
7/31/2013	Document Reproduction Charges	07/01/2013 - 07/31/2013	0.75	Document Reproduction Charges
8/19/2013	PNC Bank	SES - airfare - Pd Che# 49778	(372.80)	Travel
8/19/2013	PNC Bank	SES - Exceed Travel - Pd Che# 49778	35.00	Travel
8/20/2013	Thomson Reuters - West	Research from Westlaw	22.65	Research
8/20/2013	Thomson Reuters - West	Research from Westlaw	11.28	Research
8/31/2013	Document Reproduction Charges	08/01/2013 - 08/31/2013	1.80	Document Reproduction Charges
9/30/2013	Document Reproduction Charges	09/01/2013 - 09/30/2013	1.65	Document Reproducti Charges
10/15/2013	Thomson Reuters - West	Inv# 828126421 - Research from Westlaw	25.40	Research
10/15/2013	Pacer Service Center	Inv# SS0479-Q32013 -Research	5.20	Research
10/31/2013	Document Reproduction Charges	10/01/2013 - 10/31/2013	1.80	Document Reproduction Charges
11/11/2013	Thomson Reuters - West	Inv#828333794 - Research from Westlaw	16.50	Research
11/30/2013	Document Reproduction Charges	11/01/2013 - 11/30/2013	0.60	Document Reproduction Charges

4 (0 (5 0 4 4				In .
1/8/2014	Pacer Service Center	Research - Pd Che# 50411	7.70	Research
1/31/2014	Document Reproduction Charges	01/01/2014 - 01/31/2014	3.45	Document Reproduction Charges
2/25/2014	Thomson Reuters - West	Research - Westlaw Inv#828736973	147.98	Research
3/31/2014	Document Reproduction Charges	03/01/2014 - 03/31/2014	1.05	Document Reproduction Charges
4/7/2014	Pacer Service Center	Inv# SS0749-Q12014 - Research -Pd Che# 50734	2.20	Research
7/13/2014	Thomson Reuters - West	Research - Westlaw Inv#828736973	10.11	Research
7/31/2014	Document Reproduction Charges	07/01/2014 - 07/31/2014	0.15	Document Reproduction Charges
8/31/2014	Document Reproduction Charges	08/01/2014 - 08/31/2014	0.15	Document Reproduction Charges
10/7/2014	Pacer Service Center	Inv# 2639972-Q32014 - Research - Pd Che# 51623	1.80	Research
4/30/2015	Document Reproduction Charges	04/01/2015 - 04/30/2015	9.60	Document Reproduction Charges
5/1/2015	Thomson Reuters - West	Inv# 831740777 Research - Pd Che# 52418	393.17	Research
5/31/2015	Document Reproduction Charges	05/01/2015 - 05/31/2015	4.32	Document Reproduction Charges
6/30/2015	Document Reproduction Charges	06/01/2015 - 06/30/2015	9.90	Document Reproduction Charges
7/31/2015	Document Reproduction Charges	07/01/2015 - 07/31/2015	6.54	Document Reproduction Charges
8/31/2015	Document Reproduction Charges	08/01/2015 - 08/31/2015	0.60	Document Reproduction Charges
9/30/2015	Document Reproduction Charges	09/01/2015 - 09/30/2015	0.30	Document Reproduction Charges
2/1/2016	Pacer Service Center	Acct# 2639972 - Research 10/1/15-12/31/15 - Pd Che# 53545	46.50	Research
2/28/2016	Document Reproduction Charges	02/01/2016 - 02/28/2016	1.92	Document Reproduction Charges
8/3/2016	Thomson Reuters - West	Westlaw Inv# 831740777 Revised Charges for April 2015	202.51	Research
10/31/2016	Document Reproduction Charges	10/01/2016 - 10/31/2016	2.22	Document Reproduction Charges

11/30/2016	Document Reproduction Charges	11/01/2016 - 11/30/2016	21.36	Document Reproduction Charges
11/30/2016	Document Reproduction Charges	11/01/2016 - 11/30/2016	3.84	Document Reproduction Charges
12/31/2016	Document Reproduction Charges	12/01/2016 - 12/31/2016	5.76	Document Reproduction Charges
1/24/2017	Pacer Service Center	Inv# 2639972-Q42016 dated 01/09/2017 for Usage from 10/01/2016-12/31/2016 - Pd Che# 54863	0.10	Research
1/31/2017	Document Reproduction Charges	01/01/2017 - 01/31/2017	5.76	Document Reproduction Charges
4/24/2017	Arkadin, Inc	Inv# INUS170302446 dated 03/31/2017 for Phone Conference with All Counsel - Pd Che# 55209	13.30	Conference Call
4/30/2017	Document Reproduction Charges	04/01/2017 - 04/30/2017	3.84	Document Reproduction Charges
6/30/2017	Document Reproduction Charges	06/01/2017 - 06/30/2017	5.76	Document Reproduction Charges
7/31/2017	Document Reproduction Charges	07/01/2017 - 07/31/2017	10.20	Document Reproduction Charges
8/1/2017	Document Reproduction Charges	Document Production Expense Adjustment	15.84	Document Reproduction Charges
8/1/2017	Document Reproduction Charges	Document Production Expense Adjustment	30.60	Document Reproduction Charges
8/31/2017	Document Reproduction Charges	08/01/2017 - 08/31/2017	23.85	Document Reproduction Charges
11/16/2017	Stuart E. Scott, Esq.	11/08/2017 - Settlement Conference in Cincinnati: Uber-Pd Che# ACH	9.02	Travel
12/1/2017	PNC Bank	11/02/2017 - SES - Ultimate Jet Shuttle - Settlement Conference: Airfare - Pd Che# ACH	379.00	Travel
12/22/2017	Thomson Reuters - West	Inv# 837283429 12/01/2017 for Westlaw Research 11/01/17-11/30/17 - BH - Pd Che# 56015	43.66	Research
12/29/2017	PNC Bank	11/10/2017 - SES - Westin Cincinnati - Fifth Third Bank Settlement Conference: Lodging- Pd Che# ACH	339.58	Lodging
12/29/2017	PNC Bank	11/08/2017 - SES - Agent Fee - Fifth Third Bank Settlement Conference: Travel Agent Charge - Pd Che# ACH	20.00	Travel
12/31/2017	Document Reproduction Charges	12/01/2017 - 12/31/2017	3.60	Document Reproduction Charges
1/24/2018	Thomson Reuters - West	Inv# 837465643 01/01/2018 for Research 12/01/17- 12/31/17 - BH - Pd Che# 56113	264.01	Research
1/24/2018	Thomson Reuters - West	Inv# 837465643 01/01/2018 for Research 12/01/17- 12/31/17 - SMW - Pd Che# 56113	202.15	Research

2/13/2018	Pacer Service Center	Inv# 2639972-Q42017 for Research from 10/01/2017- 12/31/2017 - Pd Che# 56175	1.70	Research
2/28/2018	Document Reproduction Charges	02/01/2018 - 02/28/2018	2.55	Document Reproduction Charges
3/16/2018	Thomson Reuters - West	Inv# 837805798 03/01/2018 for Research 02/01/2018- 02/28/2018 - BH - Pd Che# 56321	75.92	Research
5/31/2018	Document Reproduction Charges	05/01/2018 - 05/31/2018	0.60	Document Reproduction Charges
7/31/2018	Document Reproduction Charges	07/01/2018 - 07/31/2018	30.00	Document Reproductio Charges
8/3/2018	Pacer Service Center	Inv# 2639972-Q22018 dated 07/06/2018 for Research 04/01/2018-06/30/2018 - Pd Che# 056720	2.30	Research
8/3/2018	Pacer Service Center	Inv# 2639972-Q22018 dated 07/06/2018 for Research 04/01/2018-06/30/2018 - Pd Che# 056720	2.90	Research
8/31/2018	Document Reproduction Charges	08/01/2018 - 08/31/2018	3.75	Document Reproduction Charges
10/25/2018	Pacer Service Center	Inv# 5314045-Q32018 dated 10/09/2018 for Usage 07/01/2018 - 09/30/2018 by JK - Pd Che# 056964	10.30	Research
10/31/2018	Document Reproduction Charges	10/01/2018 - 10/31/2018	7.80	Document Reproduction Charges
12/13/2018	Thomson Reuters - West	Inv# 839181948 11/01/2018 for Research on 10/01/18- 10/31/18 - KCH - Pd Che# 057080	306.18	Research
1/24/2019	Pacer Service Center	Inv# 2639972-Q42018 for Research 10/01/2018- 12/31/2018- Pd Che# 57177	0.20	Research
1/31/2019	Document Reproduction Charges	01/01/2019 - 01/31/2019	4.65	Document Reproduction Charges
2/28/2019	Document Reproduction Charges	02/01/2019 - 02/28/2019	4.05	Document Reproduction Charges
6/14/2019	Thomson Reuters - West	Inv# 840372183 06/01/2019 for Research 05/01/2019- 05/31/2019 - KCH - Pd Che# 57615	3.47	Research
6/30/2019	Document Reproduction Charges	06/01/2019 - 06/30/2019	45.75	Document Reproduction Charges
7/3/2019	PNC Bank	07/01/2019 - FIRM - Vast Conference - Inv# 1141086 for Case Conference Call on 06/06/2019 - SES - Pd Che# ACH	6.36	Conference Call
7/17/2019	Thomson Reuters - West	Inv# 840538677 07/01/2019 for Research 06/01/19- 06/30/19 - JZM - Pd Che# 57710	1,717.08	Research
9/4/2019	PNC Bank	08/03/2019 - FIRM - Vast Conference - Inv# 1152785 dated 08/01/2019 for T/C with Lead PLTF Counsel & Fanter: KCH	3.39	Conference Call
9/4/2019	PNC Bank	08/03/2019 - FIRM - Vast Conference - Inv# 1152785 dated 08/01/2019 for PSC Call:SES - Pd Che# ACH	5.84	Conference Call

9/4/2019	PNC Bank	08/03/2019 - FIRM - Vast Conference - Inv# 1152785 dated 08/01/2019 for T/C with Lead PLTF Counsel & Fanter: SES	4.19	Conference Call
9/4/2019	PNC Bank	08/03/2019 - FIRM - Vast Conference - Inv# 1152785 dated 08/01/2019 for All Counsel t/c to discuss Case Schedule: SES	5.94	Conference Call
9/18/2019	Thomson Reuters - West	Inv# 840878297 09/01/2019for Research 08/01/2019- 08/31/2019 - JAT - Pd Che# 57892	49.37	Research
9/30/2019	Document Reproduction Charges	09/01/2019 - 09/30/2019	5.55	Document Reproductio Charges
10/23/2019	Pacer Service Center	Inv# 2639972-Q32019 dated 10/07/2019 for Research 07/01/2019 - 09/30/2019 - Pd Che# 58066	2.60	Research
11/13/2019	Thomson Reuters - West	Inv# 841229851 11/01/2019 for Research 10/01/2019 - 10/31/2019 - JZM - Pd Che# 58084	836.33	Research
1/8/2020	PNC Bank	12/03/2019 - FIRM - Vast Conference - Inv# 1229164 dated 12/01/2019 for SES Conference Call made on 11/05/2019 & 11/25/2019 - Pd Che# ach	8.67	Conference Call
1/8/2020	PNC Bank	12/03/2019 - SES - Pacer - Inv#5314045-Q32019 dated 10/7/2019 for Research 07/01/19-09/30/19 - Pd Che# ach	5.30	Research
1/8/2020	PNC Bank	12/03/2019 - SES - Pacer - Inv#5314045-Q32019 dated 10/7/2019 for Research 07/01/19-09/30/19 - Pd Che# ach	4.90	Research
1/8/2020	PNC Bank	11/21/2019 - SES - Frontier Air- SES for Laskaris Prep & Depos: Travel - Pd Che# ach	97.60	Travel
1/8/2020	PNC Bank	11/21/2019 - SES - Agent Fee - SES for Laskaris Prep & Depos: Travel - Pd Che# ach	25.00	Travel
1/8/2020	PNC Bank	11/22/2019 - SES - Frontier Air- SES for Laskaris Prep & Depos: Travel - Pd Che# ach	142.00	Travel
1/14/2020	Pacer Service Center	Inv# 2639972-Q42019 dated 01/07/2019 for Research 10/01/2019 - 12/31/2019 - Pd Che# 58230	3.00	Research
1/17/2020	Thomson Reuters - West	Inv# 841580812 01/01/2020 for Research on 12/01/2019 - 12/31/2019 - KCH - Pd Che# 58228	744.09	Research
1/31/2020	Document Reproduction Charges	01/01/2020 - 01/31/2020	59.40	Document Reproduction Charges
2/4/2020	PNC Bank	01/03/2020 - FIRM - Vast Conference - Inv# 1222707 dated 01/01/2020 for SES Conference Call made on 12/30/2019	12.47	Conference Call
2/4/2020	PNC Bank	12/19/2019 - SES - Hilton Tampa Downtown - Lori and Daniel Laskaris - Depo Prep: Hotel - Pd Che# ACH	189.28	Lodging
2/4/2020	PNC Bank	12/20/2019 - SES - Standard Parking - Lori and Daniel Laskaris - Depo Prep: Parking - Pd Che# ACH	40.00	Parking
2/6/2020	Thomson Reuters - West	Inv# 841761414 02/01/2020 for Research on 01/01/2020 - 01/31/2020 - KCH - Pd Che# 58264	10.33	Research
2/7/2020	Veritext	Inv# MW4172693 02/04/2020 for Deposition of Jayne Fyock - Certified Transcript - 103pgs.@ \$3.35/pg Pd Che# 58263	345.05	Court Reporter

2/7/2020	Veritext	Inv# MW4172693 02/04/2020 for Deposition of Jayne Fyock - Exhibits - 385pgs. @ \$.40/pg Pd Che# 58263	154.00	Court Reporter
2/17/2020	Spangenberg Shibley & Liber LLP	SES - 11/12/2019 - Depo Prep of Lori and Daniel Laskaris - Uber: Used Personal Card (ACH 01/07/2020) - Pd Che# 58288	11.10	Travel
2/19/2020	Stuart E. Scott, Esq.	01/21/2020 - Depo of Janet Fyock: Uber - Pd Che# ACH	46.93	Travel
2/19/2020	Stuart E. Scott, Esq.	01/22/2020 - Depo of Janet Fyock: Uber - Pd Che# ACH	22.80	Travel
2/28/2020	Document Reproduction Charges	02/01/2020 - 02/28/2020	43.35	Document Reproduction Charges
3/2/2020	PNC Bank	01/22/2020 - SES - The Herrington Inn & Spa - Janet Fyock Depo: Hotel - Pd Che# ACH	298.50	Lodging
3/2/2020	PNC Bank	01/16/2020 - SES - Standard Parking - Janet Fyock Depo Prep: Parking - Pd Che# ACH	20.00	Parking
3/2/2020	PNC Bank	01/07/2020 - SES - Agent Fee - SES Flight for Janet Fyock Depo Prep: Agent Fee	15.00	Travel
3/2/2020	PNC Bank	01/07/2020 - SES - Agent Fee - SES Flight for Janet Fyock Depo Prep: Agent Fee	25.00	Travel
3/2/2020	PNC Bank	01/07/2020 - SES - American Air- SES Flight for Janet Fyock Depo Prep: Travel	241.40	Travel
3/2/2020	PNC Bank	01/08/2020 - SES - Southwest Early Bird - Southwest Early Bird - Pd Che# ACH	20.00	Travel
3/2/2020	PNC Bank	01/08/2020 - SES - Agent Fee - SES Travel for Brian Harrison Depo Prep: Agent Fee - Pd Che#ACH	25.00	Travel
3/2/2020	PNC Bank	01/08/2020 - SES - Southwest - SES Travel for Brian Harrison Depo Prep: Travel - Pd Che# ACH	105.98	Travel
3/2/2020	PNC Bank	01/15/2020 - SES - Lombard Taxi- Janet Fyock Depo Prep: Taxi (Email Receipt never sent to SES) - Pd Che# ACH	263.82	Travel
3/2/2020	PNC Bank	01/15/2020 - SES - Agent Fee - Janet Fyock Depo Prep: Agent Fee - Pd Che# ACH	25.00	Travel
3/2/2020	PNC Bank	01/20/2020 - SES - Agent Fee - Janet Fyock Depo: Agent Fee - Pd Che# ACH	20.00	Travel
3/2/2020	PNC Bank	01/21/2020 - SES - Taxi Svc Chicago - Janet Fyock Depo: Taxi - Pd Che# ACH	164.70	Travel
3/2/2020	PNC Bank	01/23/2020 - SES - Hyatt Hotels Holston - SES Travel for Brian Harrison Depo Prep: Hotel - PdChe# ACH	63.66	Travel
3/2/2020	PNC Bank	01/23/2020 - SES - Hyatt Hotels Holston - SES Travel for Brian Harrison Depo Prep: Hotel - PdChe# ACH	324.21	Travel
3/2/2020	PNC Bank	01/27/2020 - SES - Southwest Early Bird - SES Travel for Brian Harrison Depo: Travel - Pd Che# ACH	20.00	Travel

3/2/2020	PNC Bank	01/27/2020 - SES - Agent Fee - Janet Fyock Depo & Harrison Prep: Agent Fee - Pd Che# ACH	25.00	Travel
3/2/2020	PNC Bank	01/27/2020 - SES - Southwest - SES Travel for Brian Harrison Depo: Travel - Pd Che# ACH	399.96	Travel
3/2/2020	PNC Bank	01/20/2020 - SES - United - Janet Fyock Depo & Harrison Prep: Travel - Pd Che# ACH	437.21	Travel
3/3/2020	Veritext	Inv# MW4203879 02/24/2020 for Deposition of Brian Harrison -Certified Transcript - Medical, Technical, or Video - 102 pgs. @ \$3.35/pg Pd Che# 58309	341.70	Court Reporter
3/3/2020	Veritext	Inv# MW4203879 02/24/2020 for Deposition of Brian Harrison -Exhibits - 281 pgs. @ \$.45/pg Pd Che# 58309	126.45	Court Reporter
3/10/2020	Thomson Reuters - West	Inv# 841922597 03/01/2020 for Research on 02/01/2020 - 02/29/2020 - KCH - Pd Che# 58324	647.98	Research
4/2/2020	PNC Bank	03/03/2020 - FIRM - Vast Conference - Inv# 1274435 dated 03/01/2020 for SES Conference Call - Pd Che# ACH	5.86	Conference Call
4/2/2020	PNC Bank	02/05/2020 - SES - Hyatt Hotels Holston - Depo of Brian Harrison: Hotel - Pd Che# ACH	409.30	Lodging
4/2/2020	PNC Bank	02/06/2020 - SES - Standard Parking - Depo of Brian Harrison: Parking - Pd Che# ACH	40.00	Parking
4/2/2020	PNC Bank	02/04/2020 - SES - Nash Vegas Cab - Depo of Brian Harrison: Taxi - Pd Che# ACH	30.00	Travel
4/2/2020	PNC Bank	02/05/2020 - SES - Pick Up & Drop - Videotaped Depo of Brian Harrison: Travel - Pd Che# ACH	32.50	Travel
4/14/2020	Pacer Service Center	Inv# 2639972-Q12020 dated 04/06/2020 for Research 01/01/2020 - 03/31/2020 - Pd Che# 58385	0.80	Research
4/14/2020	Pacer Service Center	Inv# 5314045-Q12020 dated 04/06/2020 for Research 01/01/2020 - 03/31/2020 - Pd Che# 58384	3.30	Research
4/14/2020	Pacer Service Center	Inv# 5314045-Q12020 dated 04/06/2020 for Research 01/01/2020 - 03/31/2020 - Pd Che# 58384	3.10	Research
4/30/2020	Document Reproduction Charges	04/01/2020 - 04/30/2020	10.50	Document Reproducti Charges
5/8/2020	PNC Bank	04/03/2020 - FIRM - Vast Conference - Inv# 1299928 dated 04/01/2020 for SES Conference Call - Pd Che# ACH	28.62	Conference Call
5/31/2020	Document Reproduction Charges	05/01/2020 - 05/31/2020	3.30	Document Reproducti Charges
6/5/2020	PNC Bank	05/03/2020 - FIRM - Vast Conference - Inv# 1326199 dated 05/01/2020 for SES Conference Call - Pd Che# ACH	16.44	Conference Call
6/30/2020	Document Reproduction Charges	06/01/2020 - 06/30/2020	2.55	Document Reproducti Charges
7/2/2020	PNC Bank	6/3/2020 - FIRM - Vast Conference - Inv# 1344937 dated 06/01/2020 for SES Conference Call - Pd Che# ACH	22.03	Conference Call

7/31/2020	Document Reproduction Charges	07/01/2020 - 07/31/2020	18.75	Document Reproduction Charges
8/7/2020	PNC Bank	07/03/2020 - FIRM - Vast Conference - Inv# 1357732 dated 07/01/2020 for SES Conference Call - Pd Che# ACH	15.28	Conference Call
8/7/2020	PNC Bank	06/04/2020 - FIRM - Thomson West - Inv# 842252016 dated 05/01/2020 for Research on 04/01/2020 - 04/30/2020 - KCH - Pd Che# ACH	467.94	Research
8/31/2020	Document Reproduction Charges	08/01/2020 - 08/31/2020	8.70	Document Reproduction Charges
9/3/2020	PNC Bank	08/03/2020 - FIRM - Vast Conference - Inv# 1377732 dated 08/01/2020 for SES Conference Call - Pd Che# ACH	7.54	Conference Call
9/3/2020	PNC Bank	07/07/2020 - FIRM - Thomson West - Inv#842420279 dated 06/01/2020 for Research on 05/01/2020 - 05/31/2020 - KCH - Pd Che# ACH	52.79	Research
9/24/2020	PNC Bank	08/05/2020 - FIRM - Thomson West - Inv# 842579247 dated 07/01/2020 for Research on 06/01/2020 - 06/30/2020 - KCH - Pd Che# ACH	2.24	Research
9/24/2020	PNC Bank	08/04/2020 - FIRM - Ultimate Air Shuttle - SES Travel for Mediation - Pd Che# ACH	428.00	Travel
9/24/2020	PNC Bank	08/11/2020 - FIRM - Ultimate Air Shuttle - Refund for Cancelled Flight - Pd Che# ACH	(378.00)	Travel
9/30/2020	Document Reproduction Charges	09/01/2020 - 09/30/2020	8.70	Document Reproduction Charges
10/13/2020	Pacer Service Center	Inv# 2639972-Q32020 dated 10/07/2020 for Research 07/01/2020 - 09/30/2020 - FIRM- Pd Che# 58724	5.90	Research
10/19/2020	PNC Bank	09/14/2020 - FIRM - Thomson West - Inv# 842749941 dated 08/01/2020 for Research on 07/01/2020 - 07/31/2020 - KCH - Pd Che# ACH	239.04	Research
11/12/2020	PNC Bank	10/06/2020 - FIRM - Thomson West - Inv# 84292086 dated 09/01/2020 for Research on 08/01/2020 - 08/31/2020 - KCH - Pd Che# ACH	1,229.66	Research
4/13/2021	PNC Bank	Inv# 1471184 dated 3/1/2021 for SES Conference Call - Pd Che# ach	2.92	Conference Call
5/17/2021	PNC Bank	5/17/2021 - FIRM - Thomson West- Inv# 844094579 dated 4/1/2021 for Research 3/1/2021 - 3/31/2021 - KCH - Pd Che# ach	371.04	Research
5/31/2021	Document Reproduction Charges	05/01/2021 - 05/31/2021	59.25	Document Reproduction Charges
6/1/2021	PNC Bank	5/3/2021 FIRM Vast Conference Inv# 1493186 - 5/1/2021 for SES conference call - Pd Che# ach	1.55	Conference Call
6/16/2021	PNC Bank	5-1-2021 - FIRM - Thomson West - Inv# 844286617 - For Research 4/1/2021 - 4/30/2021 - KCH - Pd Che# ach	146.45	Research
6/30/2021	Document Reproduction Charges	06/01/2021 - 06/30/2021	3.60	Document Reproduction Charges
9/28/2021	Thomson Reuters - West	9/1/2021 FIRM Thomson Reuters West - For research August 1 -August 31 KCH - Pd Che# 59627	650.43	Research

10/20/2021	Pacer Service Center	#5314045-Q32021C 7/14/2021 Cash Advance	4.60	Research
		Litigation for research 7/1/21 - 9/30/21 - PdChe# 59723		
10/20/2021	Pacer Service Center	#5314045-Q32021C 8/31/2021 Cash Advance Litigation for research 7/1/21 - 9/30/21 - PdChe# 59723	6.00	Research
10/31/2021	Document Reproduction Charges	10/01/2021 - 10/31/2021	18.90	Document Reproduction Charges
11/16/2021	Thomson Reuters - West	#845270527C 11/1/2021 For research Oct 1 - Oct 31 KCH - Pd Che# 59780	62.24	Research
11/19/2021	Veritext	#5401217 11/18/2021 Certified Transcript (161 pgs.) Attendance (4 hrs.) Exhibits, surcharge - video proceeding - Pd Che# 59815	1,723.00	Court Reporter
12/31/2021	Document Reproduction Charges	12/01/2021 - 12/31/2021	10.50	Document Reproduction Charges
1/19/2022	Pacer Service Center	5314045-Q42021C 1/19/2022 Usage from 10/1/21 - 12/31/21 SES - Pd Che# 59913	1.00	Research
1/19/2022	Pacer Service Center	5314045-Q42021C 1/19/2022 Usage from 10/1/21 - 12/31/21 SES - Pd Che# 59913	3.00	Research
2/21/2022	Worldwide Express	#2202089198 2/16/2022 SES to MNS C DEV LLC - Pd Che# 60004	43.15	Postage
2/28/2022	Document Reproduction Charges	02/01/2022 - 02/28/2022	6.90	Document Reproduction Charges
3/3/2022	RELX Inc. DBA LexisNexis	#3093717458C 2/1/2022 LexisNexis research - Pd Che# 60029	12.09	Research
3/8/2022	CS Disco, Inc.	#164554 3/1/2022 eDiscovery review database - Pd Che# 60044	173.14	Document Management - SSL Share
3/10/2022	CS Disco, Inc.	#164695 1/1/2022 Downloaded data/Performed load file (review databases) - Pd Che# 60044	871.84	Document Management - SSL Share
3/10/2022	CS Disco, Inc.	#164697 2/1/2022 Create review stage/added documents; remediated encrypted file, staged and validated data, converted images	548.99	Document Management - SSL Share
3/10/2022	Thomson Reuters - West	3/1/2022 For research 2/1/22 - 2/28/22 - KCH - Pd Che# 60037	95.43	Research
3/10/2022	Thomson Reuters - West	3/1/2022 For research 2/1/22 - 2/28/22 - PMF - Pd Che# 60037	42.32	Research
3/31/2022	Document Reproduction Charges	03/01/2022 - 03/31/2022	2.25	Document Reproduction Charges
4/5/2022	Capitol Process Services, Inc.	#1600209 3/28/2022 Deposition of Bruce Howard 1/3 of the invoice paid by SSL - Pd Che# 60076	127.11	Process Service
4/12/2022	CS Disco, Inc.	#168438 4/1/2022 Reviewed metadata overlay, separated records - Pd Che# 60118	240.78	Document Management - SSL Share
4/12/2022	Thomson Reuters - West	4/1/2022 For research 3/1/22 - 3/31/22 - KCH - Pd Che# 60136	341.32	Research
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4/30/2022	Document Reproduction Charges	04/01/2022 - 04/30/2022	48.00	Document Reproductio Charges
5/4/2022	Stuart E. Scott, Esq.	05042022C 4/28/2022 Depo ofarpenter Erhardt 579 miles @ .535/mile - Pd Che# ach	309.77	Travel
5/31/2022	Document Reproduction Charges	05/01/2022 - 05/31/2022	27.75	Document Reproduction Charges
6/7/2022	CS Disco, Inc.	#172837 5/1/2022Download and validate production volume 4/21/22 .33 hr.; Update images and text for clawback document4/28/22 .08 hr Pd Che# 60218	286.12	Document Managemer SSL Share
6/9/2022	PNC Bank	4/28/2022 SES Fountain Square Parking -Fifth Third Case - Pd Che# ach	21.00	Parking
6/9/2022	PNC Bank	4/29/2022 SES Westin Cincinnati Carpenter & Erhardt Depos (misc expense) - Pd Che# ach	7.00	Travel
6/9/2022	PNC Bank	4/29/2022 SES Westin Cincinnati Carpenter & Erhardt Depos - Lodging - Pd Che# ach	360.61	Travel
6/10/2022	CS Disco, Inc.	#181384 6/1/2022 Document Production Database - Pd Che# 60261	195.95	Document Managemer SSL Share
7/7/2022	Thomson Reuters - West	845625459C correction research December 2021 KCH	36.54	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/2/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	17.70	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/3/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	6.70	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/6/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	6.60	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/17/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	1.70	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/8/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	8.00	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/9/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	1.80	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/14/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	18.00	Research
7/11/2022	Pacer Service Center	#2639972-Q22022 6/28/22 for research usage from 4/1/22-6/30/22 UA - Pd Che# 60302	33.10	Research
7/12/2022	CS Disco, Inc.	#184760 7/1/2022 document production database - Pd Che# 60325	173.54	Document Managemen SSL Share
7/13/2022	Thomson Reuters - West	#846613346C 6/21/22 for research June 2022 KF - Pd Che# 60334	2,378.46	Research
7/13/2022	Thomson Reuters - West	#846613346C 6/16/22 for research June 2022 KCH - Pd Che# 60334	109.36	Research

7/13/2022	Thomson Reuters - West	#846613346C 6/29/22 for research June 2022 KW - Pd Che# 60334	873.61	Research
8/10/2022	CS Disco, Inc.	#188802 8/1/2022 Document product database for August - Pd Che# 60351	173.60	Document Management - SSL Share
8/31/2022	Document Reproduction Charges	08/01/2022 - 08/31/2022	204.75	Document Reproduction Charges
9/13/2022	CS Disco, Inc.	#192972 9/1/2022 Document product database for September2022 - Pd Che# 60418	173.54	Document Management - SSL Share
9/20/2022	Thomson Reuters - West	#846772214C 7/21/2022 for research July 2022 - KCH - Pd Che# 60438	147.61	Research
9/20/2022	Thomson Reuters - West	#846772214C 7/28/2022 for research July 2022 - KW - Pd Che# 60438	1,848.11	Research
9/20/2022	Thomson Reuters - West	#846950192C 8/18/2022 for research August 2022 - KCH - Pd Che# 60438	367.46	Research
9/20/2022	Thomson Reuters - West	#846950192C 8/2/2022 for research August 2022 - KW - PdChe# 60438	115.41	Research
9/30/2022	Document Reproduction Charges	09/01/2022 - 09/30/2022	38.40	Document Reproduction Charges
10/19/2022	CS Disco, Inc.	#197239 10/1/2022 Review database start date 10/1/22 end date 10/31/22 - Pd Che# 60504	173.54	Document Management - SSL Share
10/26/2022	Pacer Service Center	#5314045-Q32022 8/19/22 for research usage from 7/1/22 - 9/30/22 - Pd Che# 60511	4.10	Research
10/26/2022	Pacer Service Center	#5314045-Q32022 8/24/22 for research usage from 7/1/22 - 9/30/22 - Pd Che# 60511	3.10	Research
10/26/2022	Pacer Service Center	#5314045-Q32022 9/21/22 for research usage from 7/1/22 - 9/30/22 - Pd Che# 60511	4.00	Research
10/26/2022	Pacer Service Center	#5314045-Q32022 9/22/22 for research usage from 7/1/22 - 9/30/22 - Pd Che# 60511	1.00	Research
10/26/2022	Pacer Service Center	#2639972-Q32022 7/6/22 for research usage from 7/1/22-9/30/22 - KW - Pd Che# 60531	4.00	Research
10/26/2022	Pacer Service Center	#2639972-Q32022 7/13/22 for research usage from 7/1/22-9/30/22 - KW - Pd Che# 60531	3.10	Research
10/26/2022	Pacer Service Center	#2639972-Q32022 7/28/22 for research usage from 7/1/22-9/30/22 - KW - Pd Che# 60531	2.50	Research
10/31/2022	Document Reproduction Charges	10/01/2022 - 10/31/2022	75.60	Document Reproduction Charges
11/8/2022	CS Disco, Inc.	#201632 11/1/2022 Review database 11/1/22 - 11/30/22 - Pd Che# 60539	173.54	Document Management - SSL Share
11/17/2022	Thomson Reuters - West	#847111408 9/29/22 for research September 2022 - KCH - Pd Che# 60566	314.80	Research

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11/17/2022	Thomson Reuters - West	#847268648C 10/17/22 for research October 2022 - KCH - Pd Che# 60566	147.91	Research
11/30/2022	Document Reproduction Charges	11/01/2022 - 11/30/2022	6.45	Document Reproduction Charges
12/12/2022	CS Disco, Inc.	#206135 12/1/2022 Review database 12/1/22 - 12/31/22 Pd Che# 60592	173.54	Document Management SSL Share
12/20/2022	Thomson Reuters - West	#847438879C 12/1/2022 For research November 1 - November 30, 2022 - KCH - Pd Che# 60602	2.98	Research
12/20/2022	CS Disco, Inc.	Inv# 201911 for November 2022 Billed to Tycko & Zavareei for 5/3 Litigation	183.99	Document Management SSL Share
12/31/2022	Document Reproduction Charges	12/01/2022 - 12/31/2022	4.05	Document Reproduction Charges
1/6/2023	CS Disco, Inc.	Inv# 189048 August 2022 Billed to Tycoko & Zavareei	919.98	Document Management SSL Share
1/26/2023	CS Disco, Inc.	Inv # 211091 for January 2023 (Tycko)	183.99	Document Management SSL Share
2/3/2023	CS Disco, Inc.	Inv # 210788 Spangenberg 5/3 Litigation	173.54	Document Management SSL Share
2/9/2023	CS Disco, Inc.	Inv # 215407 5/3 Litigation Spangenberg	347.08	Document Management SSL Share
2/15/2023	Thomson Reuters - West	#847765012 1/31/23 for research January 2023 - KCH - Pd Che# 60723	1,190.79	Research
2/28/2023	Document Reproduction Charges	02/01/2023 - 02/28/2023	1,396.20	Document Reproduction Charges
3/7/2023	Thomson Reuters - West	#847922215C 2/28/23 for Research February 2023 - KCH -Pd Che# 60763	3,302.71	Research
3/10/2023	CS Disco, Inc.	Inv# 220057 March 2023 Spangenberg Shibley & Liber LLP (5/3 Litigation)	173.54	Document Management SSL Share
3/31/2023	Document Reproduction Charges	03/01/2023 - 03/31/2023	214.45	Document Reproduction Charges
4/6/2023	CS Disco, Inc.	Inv# 220440 March 2023 Wagner McLaughlin 5/3 Litigation	173.54	Document Management SSL Share
		Total Expenses	\$ 38,770.33	

## EXHIBIT 7



# Wagner McLaughlin & Whittemore, P.A.

Wagner McLaughlin & Whittemore, P.A. opened its first office in Tampa in 1967. Today, the firm is among the most respected plaintiffs' personal injury law firms in the state and nation, with partners who have shown extraordinary leadership in both the courtroom and the broader profession.

We handle a broad range of claims, including:

- Automobile, Truck or Motorcycle Accidents
- Professional Malpractice
- Aviation Accidents
- Class Action Litigation
- Boating Accidents
- Maritime and Admiralty
- Premises Liability
- Products Liability
- Occupational Safety
- Toxic Tort
- Insurance Company Bad Faith
- Federal Statutory Violations
- Patent and Copyright Litigation
- Complex Commercial Litigation
- Federal Tort Claims Act Litigation
- Whistleblower Claims False Claims Act

The firm is dedicated to protecting the rights of individuals.

# **Attorneys Working on Consumer Class Actions**

#### Jason Whittemore

Mr. Whittemore is the lead attorney for the firm on class actions and is a partner w with the firm. He also represents plaintiffs in claims related to consumer rights and class actions. Prior to moving into private practice, Mr. Whittemore served as a trial attorney for the Antitrust Division of the United States Department of Justice, through the Attorney General's Honors Program where he prosecuted antitrust violations and other violations of federal law which sought to limit

competition in commerce. He is a graduate of the University of Florida and Stetson University College of Law.

## Alan Wagner

Alan Wagner is a partner at the firm and has been a trial lawyer for 40 years. He is a graduate of Vanderbilt University (1980) and Florida State University College of Law (1983). Mr. Wagner is Board Certified in Civil Trial Law by the Florida Supreme Court and the National Board of Trial Advocates. He is a fellow of the American College of Trial Lawyers, a member of the American Law Institute, and was appointed by the Florida Supreme Court to serve twelve years as a member of the Florida Standard Jury Instruction Committee. During his career, he has been involved in the litigation of class actions and has tried a wide variety of cases.

# **Kevin McLaughlin**

Mr. McLaughlin is a partner with the firm. He represents plaintiffs in a wide range of claims including consumer rights and class actions. Mr. McLaughlin is a graduate of Wake Forest University and has practiced exclusively in Tampa since graduating from Stetson University College of Law in St. Petersburg, Florida.

He is a board certified civil trial lawyer, a distinction only six percent of eligible Florida Bar members have earned.

#### Michael McLaughlin

Mr. McLaughlin is a partner with the firm. He represents plaintiffs in a wide range of claims including class actions and consumer rights. Mr. McLaughlin is a former prosecutor and prosecuted thousands of cases for the Hillsborough County State Attorney's Office in Tampa, Florida. Mr. McLaughlin is a graduate of Florida State University and has practiced exclusively in Tampa since graduating from Florida State University College of Law in Tallahassee, Florida.

# **Consumer Class Action Experience**

**Avatel Industries Class Action,** Jason Whittemore served as co-lead counsel in litigation against Avatel Industries for its practice of force-placing insurance on leased office equipment. The case settled in advance of class certification.

**Bank Of America Class Action,** Jason Whittemore and Kevin McLaughlin served as counsel in litigation against Bank of America for its practice in force placing flood insurance. This case was settled after class certification.

**Bluegreen Corporation Class Action**, Jason Whittemore served as co-lead counsel in litigation against Bluegreen Corporation for violation of the Florida Time Share Act. The case settled in advance of class certification.

**Capital One National Class Action.** Kevin McLaughlin served as co-lead counsel in litigation against Capital One alleging claims related to Capital One's payment protection product. The case settled on behalf of the class.

Citibank, N.A., Jason Whittemore and Kevin McLaughlin served as counsel in litigation against Citibank for its practice in force placing flood insurance. The case settled in advance of certification.

**Express Scripts Class Action,** Jason Whittemore served as counsel in litigation against Express Scripts for its practice in charging processing fees for medical records requests made by patients. This case settled.

**Iberia Banking Practices Class Action.** Kevin McLaughlin served as counsel in litigation against Iberia Bank for its practice of reordering debit and checking transactions in order to maximize overdraft fees. The case settled on behalf of the class.

JP Morgan Chase Class Action, Jason Whittemore and Kevin McLaughlin served as co-lead counsel in litigation against JP Morgan Chase for its practice in force placing flood insurance. The case settled without certification.

**Papa Johns Class Action,** Jason Whittemore and Alan Wagner served as lead counsel in litigation against Papa Johns for its practice of charging state sales tax for delivery fees in violation of Florida law. The case settled after class certification.

**Reservations.com Class Action,** Jason Whittemore served as co-lead counsel for Reservations.com practice regarding cancellation fees. The case settled in advance of certification.

**TD Bank Class Action**, Jason Whittemore served as counsel in litigation against TD Bank for its overdraft practice. This case settled after class certification.

Wells Fargo Bank, N.A., Jason Whittemore and Kevin McLaughlin serves as co-lead counsel in litigation against Wells Fargo Bank for its practice in force placing flood insurance. This case was settled in advance of certification.

# EXHIBIT 8

# Case: 1:12-cv-00851-MRB Doc #: 303-9 Filed: 12/26/23 Page: 2 of 2 PAGEID #: 10534 **In re Fifth Third Early Access**

# In re Fifth Third Early Access Wagner, McLaughlin Whittemore, P.A. Lodestar from Inception to Present-TILA

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<b>Laffey Rate</b>	<u>Lodestar</u>
Jason Whittemore (11-19 years)	Partner	975.90	\$878/hr	\$856,840.20
Alan Wagner (20+ years)	Partner	53.8	\$1057/hr	56,866.60
Kevin McLaughlin (20+ years)	Partner	91	\$1057/hr	\$96,187.00
Michael McLaughlin (20+ years)	Partner	108.3	\$1057/hr	114,473.10
Arelys McQuade/ Vicky Knudsen	Paralegal	79.1	\$239/hr	\$18.904.90

Totals: 1,308.10 \$1,143,271.80

# EXHIBIT 9 Part A

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Date	Attorney	<u>Description</u>	<u>Time</u>
09/20/12	JW	Research Fifth Thirds payday loans policy and procedures and whether banks are permitted to participate in payday loans	3.4
09/20/12	JW	Conference with Kevin McLaughlin regarding potential class action against Fifth Third	.2
09/20/12	JW	Prepare e-mail to Brent Walker and Steve Owings regarding Fifth Third potential class action.	.2
10/04/12	JW	Teleconference with Steve Owings and Brent Walker regarding potential class action case against 5/3 bank.	.5
10/05/12	JW	Research causes of action for overcharging interest on payday loans.	.3
10/22/12	JW	Review e-mail from Brent Walker regarding advertisement for customers of Fifth Third payday loans	.1
10/22/12	JW	Review advertisement seeking customers of Fifth Third payday loans.	.1
10/22/12	JW	Prepare e-mail to Brent Walker regarding approval of advertisement.	.1
10/22/12	JW	Prepared letter to Florida Bar regarding request for approval of advertisement.	.3
10/31/12	JW	Teleconference with regarding her Fifth Third Early Access Account in response to advertisement.	.7
10/31/12	JW	Teleconference with Lori Laskaris regarding her Fifth Third Early Access Account in response to advertisement.	.4
11/2/12	JW	Reviewed e-mails from Brent Walker regarding call responses to advertisement	.2
11/5/12	JW	Reviewed e-mail from Brent Walker regarding call response to advertisement	.1
11/5/12	JW	Teleconferences with customers of Fifth Third Early Access Program in response to advertisement.	2.3
11/8/12	JW	Teleconference with Fifth Third Early Access Customer in response to advertisement.	.3
11/8/12	JW	Prepared e-mail to co-counsel regarding summary of calls to date.	1
11/9/12	JW	Reviewed e-mail from Brent Walker regarding call responses.	.1
11/27/12	JW	Researched potential causes of action for complaint	1.2
11/27/12	JW	Prepared e-mail to Brent Walker regarding scheduling teleconference to discuss drafting the complaint.	.1

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Date	Attorney	Description	Time
11/28/12	JW	Teleconference with customers of Fifth Third responding to advertisement.	.1
11/28/12	JW	Reviewed e-mail from Brent Walker regarding scheduling teleconference to discuss drafting the complaint.	.1
11/29/12	JW	Continued research of potential causes of action.	2.3
11/29/12	JW	Teleconference with Brent Walker and Davy Carter regarding preparing complaint	.3
11/29/12	JW	Teleconference with Lori Laskaris regarding initial client meeting.	.1
12/03/12	JW	Continued research for potential causes of action	.6
12/04/12	JW	Meet with co-counsel Steve Owings to discuss potential causes of action and preparing Complaint.	3.1
12/04/12	JW	Initial client meeting with Daniel and Lori Laskaris	1.1
12/06/12	JW	Researched to prepare Complaint.	1.4
12/06/12	JW	Prepared e-mail to Steve Owings complaint along with analysis.	.3.
12/06/12	JW	Reviewed e-mail from Steve Owings	.1
12/06/12	JW	Prepared e-mail to Steve Owings in response to his email regarding	.1
12/06/12	JW	Reviewed e-mail from Steve Owings regarding	.1
12/06/12	JW	Reviewed e-mail from Steve Owings attaching	.1
12/06/12	JW	Reviewed and researched	.2
12/06/12	JW	Prepared e-mail to Steve Owings and Brent Walker regarding	.2
12/07/12	JW	Teleconference with Alex Owings regarding strategy for preparing Complaint.	.3
12/07/12	JW	Prepared e-mail to Alex Owings attaching documents from research to provide background on case.	.1
12/07/12	JW	Began preparing Complaint	.3
12/08/12	JW	Reviewed e-mail from Davy Carter regarding	.1
12/08/12	JW	Prepared e-mail to Davy Carter regarding	.1

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Date	Attorney	Description	Time
12/09/12	JW	Continued preparation of Complaint.	2.3
12/10/12	JW	Continued preparation of Complaint.	6.4
12/11/12	JW	Reviewed e-mail from Steve Owings requesting conference call regarding status of Complaint	.1
12/11/12	JW	Prepared e-mail to Steve Owings confirming availability for conference call	.1
12/11/12	JW	Reviewed e-mail from Brent Walker confirming availability for conference call.	.1
12/11/12	JW	Prepared e-mail regarding status of draft complaint.	.1
12/12/12	JW	Continued preparation of Complaint	2.2
12/14/12	JW	Continued Preparation of Complaint	1.1
12/14/12	JW	Prepared e-mail to co-counsel attaching draft Complaint.	.1
12/15/12	JW	Quarterly review of cases; Status update on Fifth Third case; discussed strategy moving forward against 5thThird, discussed for complaint against Fifth-Third, review of current complaint, suggested amendments to complaint, TILA discussion and discussion of adding counts to complaints.	2.1
12/19/12	JW	Teleconference with Alex Owings regarding analysis of potential causes of action pled in draft complaint	.4
12/31/12	JW	Reviewed e-mail from Steve Owings suggesting	.1
12/31/12	JW	Prepared e-mail to co-counsel regarding	.1
1/3/13	JW	Prepared e-mail to Alex Owings requesting conference call to discuss	.1
1/3/13	JW	Reviewed e-mail from Alex Owings confirming	
1/8/13	JW	Reviewed e-mail from Steve Owings	
1/8/13	JW	Prepared e-mail to Steve Owings	
1/8/13	JW	Reviewed e-mail from Steve Owings	- 04
1/8/13	JW	Reviewed e-mail from Brent Walker regarding complaint being ready to file.	
1/8/13	JW	Prepared e-mail to Alex Owings attaching most recent draft complaint.	

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Date	Attorney	Description	Time
1/8/13	JW	Reviewed e-mail from Alex Owings attaching edits to draft complaint.	.1
1/8/13	JW	Reviewed Alex Owings edits to draft complaint	.3
1/11/13	JW	Reviewed Kevin McLaughlin's edits to draft Complaint.	.2
1/11/13	JW	Continued preparation of complaint	.6
2/11/13	JW	Continued preparation of complaint	.8
2/12/13	JW	Finalized and filed complaint	.3
2/12/13	JW	Teleconference with Steve Owings regarding class definition.	.2
2/21/13	JW	Reviewed e-mail from Steve Owings regarding Fifth Third counsel's request for teleconference.	-1
2/21/13	JW	Reviewed e-mail from Rebecca Borne with the Center for Responsible lending regarding case.	,1
2/22/13	JW	Reviewed e-mail from Brent Walker summarizing initial conference call with Fifth Third counsel Tom Meeks.	.1
2/24/13	JW	Reviewed e-mail from Fifth Third counsel Tom Meeks scheduling teleconference to discuss case and whether we would be willing to negotiate early settlement.	.1
2/25/13	JW	Teleconference with Fifth Third counsel regarding whether we would be willing to discuss early settlement and request for meeting to discuss case.	.5
2/25/13	JW	Prepared e-mail to Steve Owings and Brent Walker regarding contacting plaintiff's counsel in Ohio	.2
2/25/13	JW	Reviewed e-mail from Brent Walker regarding reaching out to plaintiff's counsel in Ohio.	.1
2/25/13	JW	Teleconference with Steve Owings, Kevin McLaughlin and Brent Walker regarding strategy moving forward with Fifth Third case and contacting Plaintiff's counsel in Ohio and what data we would require from Fifth Third to discuss settlement.	.3
2/26/13	JW	Reviewed e-mail from Steve Owings regarding teleconference with Fifth Third counsel regarding Fifth Third not agreeing to provide information prior to settlement discussions.	.l
03/01/13	JW	Conference with Kevin McLaughlin regarding response to plaintiff's counsel in similar Ohio case request for teleconference.	.2
03/01/13	JW	Teleconference with Steve Owings regarding conference call with plaintiff's counsel in similar Ohio case.	.3

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Date	Attorney	Description	Time
03/01/13	JW	Reviewed e-mail from Steve Owings regarding details to discuss with plaintiff's counsel in Ohio on conference call.	.1
03/01/13	JW	Reviewed Fifth Third's Motion to Dismiss in similar Ohio case	.6
03/01/13	JW	Reviewed e-mail from Steve Owings	.1
03/01/13	JW	Prepared e-mail to Steve Owings and Brent Walker	.1
03/01/13	JW	Teleconference with Steve Owings regarding initial thoughts on defenses likely to be raised by Fifth Third in response to Complaint.	,2
03/01/13	JW	Teleconference with plaintiff's counsel in Ohio case to discuss strategy moving forward with litigation	.9
03/01/13	JW	Reviewed e-mail from Steve Owings regarding thoughts on teleconference with plaintiff's counsel for Ohio case.	.1
03/04/13	JW	Meeting with Steve Owings and Kevin McLaughlin regarding strategy moving forward with Fifth Third case.	1.8
03/04/13	JW	Teleconference with Rebecca Borne of the Center for Responsible Lending regarding Fifth Third complaint and the payday loan programs of banks	.3
03/05/13	JW	Meeting with Steve Owings, Kevin McLaughlin and Brent Walker	1.3
03/05/13	JW	Research potential defenses to Complaint	1.2
03/07/13	JW	Reviewed Fifth Third's Unopposed Motion for Extension of Time to Respond to Complaint	.1
03/07/13	JW	Reviewed Notice of Attorney Appearance by Aaron Weiss.	
03/07/13	JW	Reviewed e-mail from Fifth Third Counsel Aaron Weiss to Judge King attaching proposed order granting motion for extension of time to respond to complaint.	
03/07/13	JW	Reviewed proposed order by Fifth Third granting motion for extension of time to respond to complaint.	
03/08/13	JW	Reviewed endorsed order granting Fifth Third's Motion for Extension of Time to Respond to Complaint.	.1
3/16/13	JW	Quarterly review of firm; Status update on Fifth Third case; discussed potential defenses to complaint, discussed motion for extension to complaint additional; discussion about costs moving forward.	1.3

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Date	Attorney	Description	Time
3/25/13	JW	Reviewed e-mail from Brent Walker attaching Fifth Third's proposed motion to transfer.	.1
3/25/13	JW	Reviewed Fifth Third's proposed Motion to Transfer.	.3
3/25/13	JW	Began researching case law in opposition to motion to transfer	.6
03/28/13	JW	Reviewed e-mail from Rebecca Bornee with Center for responsible lending regarding scheduling conference to discuss payday lending.	.1
3/28/13	JW	Prepared e-mail to Rebecca Bornee suggesting dates and times for meeting to discuss payday lending.	.1
3/28/13	JW	Reviewed e-mail from Rebecca Bornee regarding availability for meeting.	.1
03/28/13	JW	Prepared e-mail to co-counsel regarding suggested times to meet with Rebecca Bornee	.1
3/28/13	JW	Prepared e-mail to Rebecca Bornee selecting time to meet to discuss payday lending case.	.1
04/1/13	JW	Continued researching case law in opposition to motion to transfer	.9
4/2/13	JW	Prepared e-mail to Rebecca Bornee following up to confirm availability to meet on April 4, 2013	.1
4/2/13	JW	Reviewed Fifth Third's Motion to Dismiss or Transfer Venue	.3
4/2/13	JW	Reviewed Fifth Third's Unopposed Motion to Request Hearing on Motion to Dismiss or Transfer Venue	.1
4/2/13	JW	Continued research for response in opposition to motion to dismiss or transfer venue.	3.1
04/02/13	JW	Reviewed e-mail from Rebecca Borne re: topics of discussion at the teleconference	.1
04/02/13	JW	Prepared e-mail regarding suggested topics of discussion with Rebecca Borne for teleconference.	.3
04/02/13	JW	Teleconference with Ben Barnow regarding strategy with Fifth Third Litigation	.2
04/02/13	JW	Teleconference with Steve Owings to discuss teleconference with Ben Barnow regarding strategy with Fifth Third Litigation	.2
04/03/13	JW	Continued research to prepare response to Fifth Third's Motion to Dismiss or Transfer Venue	2.1
04/03/13	JW	Began preparing response to Fifth Third's Motion to Dismiss or Transfer Venue	1,3
04/04/13	JW	Teleconference with Center for Responsible Lending regarding extent of Fifth Third's payday lending practice.	1.1

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Date	Attorney	Description	Time
04/04/13	JW	Teleconference with co-counsel regarding teleconference with Fifth Third and upcoming teleconference with Ohio plaintiff's counsel.	.4
04/04/13	JW	Teleconference with Ohio Plaintiff's counsel	.3
04/04/13	JW	Continued research to prepare response to Fifth Thirds Motion to Dismiss or Transfer Venue	.7
04/09/13	JW	Teleconference with Steve Owings and Alex Owings regarding issues to brief in response to Fifth Thirds Motion to Dismiss or Transfer Venue	A
04/12/13	JW	Teleconference with Steve Owings, Brent Walker and Alex Owings	.2
04/12/13	JW	Continued research to prepare response to Fifth Third's Motion to Dismiss or Motion to Transfer.	1.8
04/12/13	JW	Continued preparation of Response to Fifth Third's Motion to Dismiss or Motion to Transfer	.5
04/13/13	JW	Continued preparation of Response to Fifth Third's Motion to Dismiss or Motion to Transfer	1.3
04/15/13	JW	Continued preparation of Response to Fifth Third's Motion to Dismiss or Motion to Transfer	4.3
4/16/13	JW	Continued preparation of Response to Fifth Third's Motion to Dismiss or Motion to Transfer	6.1
4/17/13	JW	Reviewed e-mail from Alex Owings attaching his draft portion of response to Motion to Dismiss or Transfer Venue	.1
4/17/13	JW	Reviewed Alex Owings draft portion of response to Motion to Dismiss or Transfer Venue.	.2
4/17/13	JW	Reviewed and incorporated Kevin McLaughlin's edits to Response to Motion to Dismiss or Transfer Venue.	.4
4/18/13	JW	Finalized Response to Motion to Dismiss or Transfer Venue	5.3
4/24/13	JW	Reviewed Fifth Third's Unopposed Motion for Extension of time to file reply to Plaintiffs response to motion to dismiss or transfer venue	.1
4/24/13	JW	Reviewed e-mail from Fifth Third counsel to Judge King attaching proposed order granting unopposed motion for extension of time to file reply to plaintiffs response to motion to dismiss or transfer venue	.1
4/24/13	JW	Reviewed proposed order granting unopposed motion for extension of time to file reply to plaintiffs response to motion to dismiss or transfer venue	.1

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Date	Attorney	Description	Time
4/25/13	JW	Reviewed Order Granting Fifth Third's Motion for Extension of Time to File Reply to Plaintiffs Response to Motion to Dismiss or Transfer Venue	.1
4/25/13	JW	Reviewed Consumer Finance Protection Bureau's report on Payday Loans and Deposit Advance Products	.6
5/6/13	JW	Reviewed letter from Hassan Zavareei intention to be appointed interim class counsel and enclosed Motion for Appointment as Interim Class Counsel and enclosed motion.	.5
5/6/13	JW	Reviewed Fifth Third's Reply to Plaintiff's Response in Opposition to Motion to Dismiss or Transfer	.2
5/13/13	JW	Teleconference with co-counsel to discuss responding to Ohio Plaintiff's counsel's motion for appointment as interim class counsel	.4
5/13/13	JW	Researched	.7
5/14/13	JW	Reviewed Order transferring case to Southern District of Ohio	.2
5/14/13	JW	Prepared e-mail to co-counsel attaching order transferring case to S.D. of Ohio and recommending strategy.	.2
5/14/13	JW	Reviewed e-mail from Brent Walker regarding order transferring case to S.D. of Ohio.	.1
5/14/13	JW	Reviewed e-mail from Steve Owings regarding order transferring case to S.D. of Ohio.	.1
5/14/13	JW	Notice from Clerk of transferring case to S.D. of Ohio.	.1
5/14/13	JW	Notice of assigning Judge Bertelsman to case in S.D. of Ohio.	.1
5/14/13	JW	Notice of assigning magistrate judge Stephanie Bowman to case in S.D. of Ohio.	.1
5/14/13	JW	Reviewed clerk's acknowledgement of receipt of case in S.D. of Ohio.	.1
5/14/13	JW	Reviewed string of e-mails from co-counsel regarding	.5
5/14/13	JW	Reviewed Clerks Notice requiring counsel to be admitted pro hac vice in Southern District of Ohio.	.1
5/15/13	JW	Teleconference with Steve Owings	.3
5/15/13	JW	Teleconference with co-counsel	.6

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Date	Attorney	Description	Time
5/16/13	JW	Reviewed e-mail from Alex Owings	.1
5/16/13	JW	Prepared e-mail to co-counsel	.2
5/16/13	JW	Reviewed e-mail from Steve Owings to Ronald Johnson (local counsel) in Ohio	.1
5/16/13	JW	Reviewed e-mail form Ronald Johnson	.1
5/16/13	JW	Reviewed Judge Bertlesman Order of Recusal	.1
5/17/13	JW	Reviewed and edited draft motion for extension of time to respond to Klopfenstien counsel's motion to be named interim class counsel	.4
5/20/13	JW	Teleconference with Lori Laskaris	.4
5/20/13	JW	Prepared e-mail to Ronald Johnson (local counsel) introducing the firm and requesting guidance on being admitted pro hac vice in Ohio.	.2
5/20/13	JW	Reviewed e-mail from Ronald Johnson regarding guidance on being admitted pro hac vice	.1
5/20/13	JW	Edited Jason Whittemore Affidavit for Pro Hac Vice admission	.2
5/20/13	JW	Prepared e-mail to co-counsel	.1
5/20/13	JW	Reviewed and incorporated Kevin McLaughlin's edits to motion for extension of time to respond to Klopfenstein counsel's motion to be named interim class counsel	.2
5/20/13	JW	Reviewed order transferring case to Judge Michael A. Barrett	.1
5/20/13	JW	Reviewed and edited final draft motion for extension of time to respond to Klopfenstien counsel's motion to be named interim class counsel	.2
5/20/13	JW	Reviewed string of e-mails from Alex Owing, Steve Owings and Brent Walker	.4

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Date	Attorney	Description	Time
5/20/13	JW	Reviewed e-mail from Steve Owings in response to my e-mail	.1
5/20/13	JW	Teleconference with Steve Owings	.2
5/23/13	JW	Reviewed and prepared e-mail regarding preparation for May 24, 2013 status conference with Judge Barrett	.3
5/24/13	JW	Teleconference with co-counsel regarding summary of status conference	.3
5/28/13	JW	Reviewed Order granting Motion to allow Kevin McLaughlin to Appear Pro Hac Vice	.1
5/28/13	JW	Reviewed Order granting Motion to allow Jason Whittemore to appear pro hac vice	.1
5/30/13	JW	Researched case law in response to Klopfenstien counsel's motion to be appointed interim class counsel.	.9
5/30/13	JW	Teleconference with co-counsel regarding points to address in response to Klopfenstein counsel's motion to be appointed interim class counsel.	.2
5/30/13	JW	Began preparing response to Klopfenstein counsel's motion to be appointed interim class counsel	1.5
5/31/13	JW	Continued preparing response to Klopfenstein counsel's motion to be appointed interim class counsel	.9
06/02/13	JW		.2
06/03/13	JW	Continued preparation of response to Klopfenstein counsel's motion to be appointed interim class counsel	1.2
6/03/13	JW	Reviewed and incorporated Kevin McLaughlin's edits to response to Klopfenstein counsel's motion to be appointed interim class counsel.	.3
6/04/13	JW	Prepare firm profile and proposed leadership structure as exhibits to Response to Klopfenstein counsel's motion to be appointed interim class counsel	.8
6/04/13	JW	Finalized response to Klopfenstein counsel's motion to be appointed interim class counsel	4.3

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Date	Attorney	<u>Description</u>	Time
06/06/13	JW	Reviewed Fifth Third's Motion to Stay Pending Ruling on Motion to Dismiss in Klopfenstein	,2
06/07/13	JW	Began research to prepare response to motion to stay proceedings pending ruling on Klopfenstein motion to dismiss	.9
06/10/13	JW	Continued research to prepare response to motion to stay proceedings pending ruling on Klopfenstein motion to dismiss	1.4
06/10/13	JW	Began preparation of response to motion to stay proceedings pending ruling on Klopfenstein motion to dismiss	1.9
6/10/13	JW	Reviewed letter from Plaintiffs' counsel in Klopfenstein	.2
6/11/13	JW	Continued preparation of response to motion to stay proceedings pending ruling on Klopfenstein motion to dismiss	2.6
6/12/13	JW	Reviewed e-mail from Alex Owings regarding research for response to motion to stay proceedings pending ruling on Klopfenstein motion to dismiss.	.1
6/12/13	JW	Teleconference with co-counsel regarding preparation for status conference before Judge Barrett on June 13, 2013	,7
6/13/13	JW	Prepared for status conference before Judge Barrett	.5
6/13/13	JW	Telephonically attended status conference regarding status of transfer of related cases before Judge Barrett.	.4
6/13/13	JW	Reviewed e-mails from other plaintiffs counsel in related cases	.4
6/13/13	JW	Teleconference with co-counsel regarding status conference before Judge Barrett	.6
6/13/13	JW	Reviewed Notice of Teleconference set for 06/27/13 at 12:30 by Judge Barrett	.1
6/13/13	JW	Reviewed minute entry of status conference before Judge Barrett on 06/13/13	.1
6/14/13	JW	Prepared e-mail to local counsel	.1
6/14/13	JW	Reviewed e-mail to local counsel	.1

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Date	Attorney	<u>Description</u>	Time
6/14/13	JW	Teleconference with Fifth Third counsel Karl Fanter regarding Fifth Third's position on plaintiffs' motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein.	.1
6/14/13	JW	Prepared initial draft of motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein	1.8
6/14/13	JW	Prepared email to co-counsel regarding request for edits of draft of motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein	.1
6/14/13	JW	Reviewed Alex Owings edits to draft of motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein	.1
6/14/13	JW	Reviewed Kevin McLaughlin's edits to draft of motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein	.1
6/14/13	JW	Finalized motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein	.2
6/14/13	JW	Prepared e-mail to local counsel attaching final motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein for filing.	.1
6/14/13	JW	Reviewed e-mail from Jasper Ward regarding teleconference with Fifth Third's position on agreeing to transfer of related cases without moving for stay of all proceedings	.1
6/18/13	JW	Reviewed Klopfenstein plaintiffs' motion for leave to file their reply in support of their motion to be appointed interim class counsel.	.1
6/21/13	JW	Reviewed e-mail from Jasper Ward regarding agreement to transfer McQuillen case to Southern District of Ohio	.1
6/21/13	JW	Reviewed e-mail from Tiffany Yiatras regarding status of transfer agreement with Fifth Third and Klopfenstein's motion for leave to file their reply brief in support of appointment motion.	.1
6/25/13	JW	Reviewed Order granting Laskaris's Motion to Extend Time to Respond to Motion to Stay by Fifth Third	.1
6/25/13	JW	Reviewed Order denying Klopfenstein's' Motion for leave to file reply in response to Laskaris's response in opposition to motion for class counsel.	.1
6/25/13	JW	Prepared e-mail to co-counsel regarding Order denying Klopfenstein's' Motion for leave to file reply in response to Laskaris's response in opposition to motion for class counsel.	.1
6/25/13	JW	Reviewed e-mail from Tiffany Yiartras regarding request for edits on Joint Motion to Transfer in Fyock case.	.1

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Date	Attorney	Description	Time
06/25/13	JW	Reviewed Fyock case joint motion to transfer	.2
6/25/13	JW	Prepared e-mail to Tiffany Yiartras regarding approval of Joint Motion to Transfer in Fyock	.1
6/26/13	JW	Reviewed e-mail from Jasper Ward regarding request for conference call to discuss strategy for 06/27/13 status conference before Judge Barrett	1
06/26/13	JW	Prepared e-mail to Jasper Ward regarding availability for conference call to discuss strategy for 06/27/13 status conference before Judge Barrett	.1
6/27/13	JW	Reviewed minute entry from status conference	.1
6/28/13	JW	Teleconference with Kevin McLaughlin to discuss summary of 06/27/13 status conference.	.3
6/29/13	JW	Quarterly review of firm; Status update on Fifth Third case; discussed potential defenses to complaint, discussed motion for extension to complaint additional; discussion about costs moving forward.	1.7
6/30/13	JW	Reviewed proposed leadership structure letter to Judge Barrett prepared by co-counsel.	,1
6/30/13	JW	Prepared e-mail to co-counsel approving of proposed leadership letter to Judge Barrett	,1
7/02/13	JW	Continued preparation of response to Fifth Thirds motion to stay pending ruling on Klopfenstein motion to dismiss	1,1
7/3/13	JW	Continued preparation of response to Fifth Thirds motion to stay pending ruling on Klopfenstein motion to dismiss.	1,4
7/08/13	JW	Continued preparation of response to Fifth Third's Motion to Stay pending ruling on Klopfenstein motion to dismiss	2.8
7/09/13	JW	Finalized Response to Fifth Third's Motion to Stay pending ruling on Klopfenstein motion to dismiss	1.8
7/10/13	JW	Reviewed finalized letter to Judge Barrett prepared by Casey Flynn regarding proposed leadership structure and position of counsel for 07/12/13 meeting	
7/10/13	JW	Reviewed Klopfenstien's reply in support of motion for appointment of interim class counsel.	- 4
7/11/13	JW	Travel from Tampa to Cincinnati for Status Conference meet with Judge Barrett	6.5
7/11/13	JW	Meet with Steve Owings to	2.

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Date	Attorney	Description	Time
7/12/13	JW	Meet with local counsel Penny Hendy to	2.1
7/12/13	JW	Status conference luncheon with Judge Barrett to discuss appointment of interim class counsel.	1.9
7/12/13	JW	Travel from Cincinnati to Tampa to return from Status Conference meeting with Judge Barrett	8.2
7/12/13	JW	Teleconference with Kevin McLaughlin regarding summary of meeting with Judge Barrett and Klopfenstein counsel in Cincinnati	,2
7/14/13	JW	Reviewed e-mail from Steve Owings	,1
7/15/13	JW	Reviewed e-mail from co-lead counsel Stuart Scott attaching proposed case management order regarding class counsel.	.1
7/15/13	JW	Reviewed proposed case management order regarding class counsel.	.1
7/15/13	JW	Prepared e-mail to Casey Flynn, Jasper Ward, Tiffany Yiatris, Steve, Owings, and Penny Hendy attaching proposed order on appointment of class counsel.	-1
7/16/13	JW	Revised proposed case management order regarding class counsel and incorporated edits from Tiffany Yiatris and Casey Flynn.	1.2
7/16/13	JW	Prepared e-mail to Stuart Scott and Hassan Zavareei attaching suggested addition and edits to proposed case management order on appointment of class counsel.	.2
7/16/13	JW	Reviewed final proposed case management order to be sent to Judge Barrett	.1
7/17/13	JW	Prepared e-mail to Steve Owings, Jasper Ward, Casey Flynn, Alex Owings, and Tiffany Yiatris attaching final proposed order on case management conference that was sent to Judge Barrett.	.1
7/18/13	JW	Revised Proposed Billing Protocol for Plaintiffs counsel on consolidated cases	1,1
7/18/13	JW	Prepared e-mail to Hassan Zavareei and Stuart Scott attaching proposed billing protocol for plaintiffs counsel in consolidated action.	.1
7/19/13	JW	Teleconference with Hassan Zavareei and Stuart Scott regarding billing protocol and strategy for consolidating related cases.	.5
7/19/13	JW	Reviewed Hassan Zavareei's edits to proposed billing protocol and revised the same	.3
7/20/13	JW	Reviewed additional edits from Hassan Zavareei and Stuart Scott regarding proposed billing protocol and revised the same.	.2
7/23/13	JW	Finalized Billing Protocol	.3

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Date	Attorney	Description	Time
7/23/13	JW	Prepared e-mail to non-lead plaintiffs' counsel describing and attaching billing protocol	.2
7/24/13	JW	Reviewed e-mail from Stuart Scott regarding Fifth Third's position on consolidating complaint once related cases transferred to S.D. of Ohio.	.1
7/31/13	JW	Reviewed e-mail from Tiffany Yiatris	.6
8/1/13	JW	Prepared e-mail to Hassan Zavareei and Stuart Scott attaching proposed held costs expense form.	,1
8/1/13	JW	Prepared e-mail to Steve Owings and Alex Owings	.2
8/3/13	JW	Reviewed e-mail from Stuart Scott regarding conference call with Karl Fanter, Fifth Third Counsel, regarding time frame for consolidating complaint.	5.1
8/5/13	JW	Reviewed e-mail from Alex Owings regarding	.1
8/5/13	JW	Reviewed e-mail from Stuart Scott regarding	.1
8/7/13	JW	Reviewed e-mail from Hassan Zavareei to Ben Barnow	.1
8/9/13	JW	Reviewed edits to	.:
8/13/13	JW	Prepared e-mail to all plaintiffs' counsel attaching held costs expense form.	.1
8/13/13	JW	Reviewed e-mail from Jasper Ward regarding	
8/13/13	JW	Prepared e-mail to Hassan Zavareei and Stuart Scott regarding	
8/14/13	JW	Prepared e-mail to Jasper Ward with thoughts	
8/19/13	JW	Teleconference with Hassan Zavareei and Stuart Scott to discuss consolidating compliant and causes of action to be plead in amended complaint.	1.1

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Date	Attorney	Description	Time
8/19/13	JW	Prepared draft e-mail to plaintiffs' counsel with requests	.6
8/19/13	JW	Began researching to prepare consolidated complaint.	.9
8/19/13	JW	Teleconference with Jasper Ward regarding	.2
8/21/13	JW	Reviewed e-mail from Casey Flynn requesting clarification on target date for filing amended consolidated complaint.	.1
8/21/13	JW	Prepared e-mail to Casey Flynn providing target date for filing amended consolidated complaint.	.1
8/22/13	JW	Researched	1.2
8/22/13	JW	Prepared e-mail to Hassan Zavareei and Stuart Scott regarding	.2
08/26/13	JW	Researched	1.2
8/27/13	JW	Researched	1.6
8/28/13	JW	Researched	2.8
9/2/13	JW	Reviewed e-mail from Jasper Ward requesting	.1
9/2/13	JW	Prepared e-mail in response to Jasper Ward's e-mail	.1
9/3/13	JW	Teleconference with co-lead counsel regarding upcoming status conference and research status for consolidating complaint.	.6
9/3/13	JW	Met with client	1.3
9/5/13	JW	Began preparation of memorandum of law	4.3

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Date	Attorney	Description	Time
9/6/13	JW	Finalized memorandum of law	3.2
9/10/13	JW	Reviewed	.7
9/10/13	JW	Reviewed	.5
9/11/13	JW	Teleconference with Rebecca Bornee from Center of Responsible Lending	.2
9/11/13	JW	Prepared e-mail to Jeff Kaliel regarding from Rebecca Bornee	.1
9/11/13	JW	Reviewed e-mail from Jeff Kaliel regarding	.1
9/11/13	JW	Teleconference with Hassan Zavareei regarding preparation for status conference before Judge Barrett	.3
9/11/13	JW	Prepared e-mail to all plaintiffs' counsel requesting only Hassan Zavareei and I call in to status conference.	.1
9/11/13	JW	Attended status conference before Judge Barrett regarding consolidating complaint.	.5
9/11/13	JW	Prepared e-mail to all plaintiffs' counsel summarizing status conference.	.2
9/12/13	JW	Reviewed e-mail and case law from Tiffany Yiatris regarding	.2
9/12/13	JW	Teleconference with Tiffany Yiatris regarding	.2
9/12/13	JW	Researched	1.2
9/12/13	JW	Prepared e-mail to Stuart Scott and Hassan Zavareei forwarding case law provided by Tiffany Yiatris	.1
9/12/13	JW	Prepared e-mail to Daniel French and Jeff Kaliel	.1
9/12/13	JW	Reviewed e-mail from Daniel French regarding	.1
9/13/13	JW	Reviewed e-mail from Stuart Scott regarding	.1
9/13/13	JW	Prepared e-mail to Daniel French in response	.2

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Date	Attorney	Description	Time
9/13/13	JW	Prepared e-mail to Stuart Scott in response to his e-mail regarding	.1
9/13/13	JW	Teleconference with Tiffany Yiatris regarding	.2
9/16/13	JW	Prepared e-mail to Daniel French discussing	.3
9/16/13	JW	Prepared e-mail to plaintiffs' counsel for	.2
9/16/13	JW	Reviewed e-mail from Casey Flynn	.1
9/16/13	JW	Reviewed e-mail from Alex Owings	.1
9/16/13	JW	Researched law on whether	2.1
9/16/13	JW	Prepared e-mail to Alex Owings and rest of plaintiffs' counsel in	.3
9/17/13	JW	Prepared e-mail to co-lead counsel regarding	.4
9/17/13	JW	Reviewed case law provided by Dan Frech in response	.5
9/17/13	JW	Reviewed e-mail from Stuart Scott regarding	.1
9/23/13	JW	Researched relevant law to prepare for teleconference with co-lead counsel to	1.1
9/23/13	JW	Began teleconference with lead counsel regarding counts to	.9
9/23/13	JW	Reviewed memorandum regarding summary of teleconference with lead counsel	.2
9/24/13	JW	Continued teleconference with lead counsel regarding	1.2

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Date	Attorney	Description	Time
9/24/13	JW	Prepared e-mail to plaintiff's' counsel regarding scheduling conference call to	.1
9/26/13	JW	Teleconference with plaintiffs' counsel to discuss	.6
9/26/13	JW	Began drafting general background and facts section of consolidated complaint	1.3
9/27/13	JW	Began additional research	.3
9/29/13	1W	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed transfer of venue and preferred choice of venue; discussed lead plaintiff's counsel committee.  Discussed recent status conference.	2.3
10/1/13	JW	Continued research on	2.3
10/2/13	JW	Continued research on	2.1
10/3/13	JW	Continued preparation of general background and facts section for consolidated complaint	4.6
10/4/13	JW	Continued preparation of general background and facts section for consolidated complaint	3.8
10/7/13	JW	Reviewed and edited first complete draft of consolidated complaint.	2.7
10/11/13	JW	Prepared additional facts section for Plaintiffs Lyn and Donald Adanich for draft consolidated Complaint	.7
10/11/13	JW	Continued review and edits for first complete draft of consolidated complaint	.8
10/14/13	JW	Edited final draft of consolidated complaint	1.9
10/15/13	JW	Made final edits to consolidated complaint	1.6
10/16/13	JW	Teleconference with co-counsel regarding filing motion to seal exhibit to consolidate complaint.	.1
10/16/13	JW	Reviewed draft motion to seal exhibit to consolidated complaint.	.1

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Date	Attorney	Description	Time
10/18/13	JW	Reviewed Order granting motion to seal exhibit to consolidated complaint	.1
10/18/13	JW	Reviewed Notice of Correction to Amended Complaint	.1
11/21/13	JW	Reviewed e-mail from Stuart Scott regarding Fifth Third's request for extension of time to respond to Complaint	.1
11/21/13	JW	Prepared e-mail to Stuart Scott agreeing to extension of time to for Fifth Third to respond to Complaint.	.1
11/24/13	JW	Reviewed proposed joint motion for extension of time to respond to Complaint drafted by FIfht Third	.1
11/26/13	JW	Reviewed as filed joint motion for extension of time to respond to Complaint drafted by Fifth Third	.,1
12/16/13	JW	Reviewed Defendant's Motion for Leave to file excess pages in Motion to Dismiss Consolidated Complaint	.1
12/16/13	JW	Reviewed Order granting Fifth Third's motion for extension of time to respond to Consolidated Complaint	.1
12/16/13	JW	Reviewed Fifth Third's Motion to Dismiss Consolidated Complaint	1.6
12/19/13	JW	Prepared for telephone conference with lead counsel to discuss	1.2
12/19/13	JW	Telephone Conference with lead counsel	.4
12/20/13	JW	Telephone conference with non-lead counsel	.5
12/20/13	JW	Reviewed Order granting Fifth Third's motion for leave to file additional pages in Motion to Dismiss.	
12/21/13	JW	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed consolidated complaint,  Advised of updated costs and projected costs moving forward.	1.5
1/3/14	JW	Reviewed Order Granting Motion for Extension to file reply to Fifth Third's Motion to Dismiss.	.1
1/10/14	JW	Continued research on	2.4
01/14/14	JW	Review, edit and consolidate draft facts, consumer protection fraud claims, and usury claims section for response to Motion to Dismiss	2.3

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Date	Attorney	Description	Time
1/16/14	JW	Reviewed article discussing	.1
1/17/14	JW	Reviewed and revised cash advanced section and general sections of response to Motion to Dismiss	3.1
1/17/14	JW	Continued research on	2.5
1/17/14	JW	Prepared analysis for co-lead counsel	.8
1/17/14	JW	Reviewed article regarding	.1
1/20/14	JW	Continued review and edit of draft response to Motion to Dismiss	3.2
1/21/14	JW	Reviewed and edited second draft with additional edits from group provided by Jeff Kaliel	2.4
1/21/14	JW	Converted Lexis Nexis cites to Westlaw cites in Response to Motion to Dismiss	.8
1/21/14	JW	Reviewed draft with edits and suggested changes provided by Hassan Zavareei	1.1
1/21/14	JW	Prepared e-mail to co-counsel attaching copy of consolidated complaint with exhibits to aid in preparation of Response to Motion to Dismiss	.1
1/21/14	JW	Reviewed final version of response to Motion to Dismiss	
2/2/14	JW	Reviewed and prepared e-mails with co-lead regarding position on Fifth Third's request for extension of time to file reply brief.	.2
2/03/14	JW	Reviewed Fifth Third's motion for extension of time to file reply brief.	.1
2/03/14	JW	Reviewed Order Granting Fifth Third's Motion for extension of time to file reply brief.	31
2/28/14	JW	Reviewed Fifth Third's motion for extension of pages in reply brief	.1
2/28/14	JW	Reviewed Fifth Third's Reply to Plaintiffs' Response to Motion to Dismiss	.8
3/5/14	JW	Reviewed order granting Fifth Third's motion for extension of pages in reply brief.	
3/7/14	JW	Reviewed letter from Fifth Third counsel attaching notice of manual filing and exhibits along with attachments	1.0

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Date	Attorney	Description	Time
3/7/14	JW	Reviewed reply brief and prepared e-mails in order to determine whether to file sur-reply brief in response to Fifth Third's reply brief.	.6
3/29/14	JW	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed status of motion to dismiss, discussed response to motion to dismiss; discussed reply brief motion to dismiss	1.6
6/16/14	JW	Read recent Supreme Court of Ohio opinion	.6
6/16/14	JW	Telephone conference with co-lead counsel regarding supreme court case	.5
6/21/14	JW	Quarterly review of firm cases; Status update on Fifth Third case;  Discussed reply brief and potential responses from Fifth Third.	1.4
8/12/14	JW	Reviewed Fifth Third's Notice of Supplemental Authority with attached authority in support of Motion to Dismiss	.8
8/12/14	JW	Reviewed e-mail from Hassan regarding attached draft of proposed supplemental authority in opposition to Fifth Third's Motion to Dismiss	.1
8/12/14	JW	Reviewed and edited proposed supplemental authority in opposition to Fifth Third's Motion to Dismiss	.2
8/12/14	JW	Prepared e-mail to Hassan approving of draft and filing of supplemental authority in opposition to Fifth Third's Motion to Dismiss	.1
8/13/14	JW	Prepared e-mail to non-lead counsel informing them of filing supplemental authority in opposition to Fifth Third's Motion to Dismiss	.1
8/18/14	JW	Reviewed Fifth Third's response to Plaintiffs' Notice of Supplemental Authority	.1
9/27/14	JW	Quarterly review of firm cases; Status update on Fifth Third; discussed Fifth Third's MTD,	1.1
12/13/14	JW	Quarterly review of firm cases; Status update on Fifth Third; Discussed pending Motion to dismiss and discussed steps moving forward. Advised of updated costs and discussion of projected costs moving forward.	.8
3/21/15	JW	Quarterly review of firm cases; Status update on Fifth Third; discussion of motion to dismiss status and steps for moving forward.	.4
3/30/15	JW	Reviewed Order on Motion to Dismiss	.4

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Date	Attorney	Description	Time
3/31/15	JW	Sent e-mail to co-lead requesting conference call to discuss Order on Motion to Dismiss	.1
4/5/15	JW	Conference call with Casey Flynn regarding Order on Motion to Dismiss	.4
4/9/15	JW	Reviewed notice of hearing/status conference	.1
4/10/15	JW	Reviewed e-mail from Judge's clerk regarding change of time for pretrial conference	.1
4/13/15	JW	Prepared -email to Judge's clerk confirming availability for new time for pretrial conference	.1
4/13/15	JW	Reviewed unopposed motion for extension of time to respond to Complaint	.1
4/15/15	JW	Reviewed notice of status conference	.1
4/23/15	JW	Reviewed Order granting Fifth Third's Motion for Extension of Time to Answer complaint	.1
4/27/15	JW	Researched	1.3
4/27/15	JW	Reviewed Fifth Third's Answer	.3
4/29/15	JW	Conference call with co-lead counsel to discuss Fifth Third's request for a conference call to discuss TILA settlement and strategy for status conference	.5
4/30/15	JW	Prepared for status conference	2.1
4/30/15	JW	Attended telephonic status conference,	.4
6/15/15	JW	Reviewed letter from Fifth Third Counsel regarding discovery responses and request for confidentiality order	.1
6/16/15	JW	Review discovery responses and proposed confidentiality order from Fifth Third	1.1
6/25/15	JW	Prepared suggested edits to confidentiality order proposed by Fifth Third	.6
6/25/15	JW	Prepared e-mail to Stuart Scott regarding thoughts on confidentiality order and discovery responses	.1
6/29/15	JW	Quarterly review of firm cases; Status update on Fifth Third.  Discussed status of abuse of discretion for plaintiff's amended complaint. Discussed motion for reconsideration. Discussed results of status conference. Reviewed discovery and responses and discussed confidentiality order submitted by Fifth Third.	2.3

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Date	Attorney	Description	Time
6/29/15	JW	Reviewed proposed letter to defense counsel regarding discovery responses	.1
7/15/15	JW	Reviewed final letter to Fifth Third regarding discovery responses	.2
7/16/15	JW	Reviewed final protective order for approval	.5
7/23/15	JW	Prepare for discovery conference with defense counsel	1.2
7/23/15	JW	Discovery conference call with defense counsel	.6
8/7/15	JW	Reviewed e-mail from Fifth Third counsel Karl Fanter attaching discovery request response letter	.1
08/7/15	JW	Reviewed letter from Defense counsel regarding discovery conference and position on outstanding issues	.2
8/16/15	1M	Teleconference with lead counsel regarding possibility of mediation	.4
8/28/15	JW	Reviewed Stipulated Protective Order	.1
8/28/15	JW	Listened to voicemail message from Fifth Third in house Jim Burke regarding status of document request to move forward with mediation	.1
8/31/15	JW	Reviewed Notice of Status Conference	.1
9/4/15	JW	Reviewed letter from Fifth Third counsel enclosing documents responsive to discovery request	,1
9/8/15	1W	Reviewed Fifth Third's notice of withdrawal by attorney Aaron Weis	1
9/19/15	JW	Quarterly review of firm cases; Status update on Fifth Third. Discussed protective order, discovery responses.	1,3
9/23/15	JW	Reviewed summary of Fifth Third's production in response to discovery requests	.1
9/24/15	JW	Reviewed e-mail from Fifth Third Counsel regarding status of review of proposed search terms	.1
9/24/15	JW	Researched Fifth Third's current terms of Early Access Program	.3
9/25/15	JW	Teleconference with co-lead regarding Fifth Third's position on mediation and what they will agree to negotiate	.6

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Date	Attorney	Description	Time
9/28/15	JW	Conferred via e-mail with co-lead regarding Fifth Third's response to our position that mediation would need to include some acceptance of counts dismissed that would be appealed	.3
10/1/15	JW	Reviewed Fifth Third's email and attachments to proposed edits to ESI	.5
10/6/15	JW	Conferred via e-mail with co-lead regarding initial demand and request for mediation to Fifth Third	.4
10/6/15	JW	Reviewed e-mail from Karl Fanter regarding response to plaintiffs concerns on limitation of search terms for discovery	.1
10/8/15	JW	Reviewed e-mail from Fifth Third counsel rejecting our initial demand proposal for mediation and counter offering a total settlement	.1
10/8/15	JW	Conferred in several e-mails with co-lead regarding response to Fifth Third's settlement offer	.4
10/12/15	JW	Reviewed draft response to counteroffer to Fifth Third's offer to settle	1
10/12/15	JW	Reviewed Fifth Third's response to counteroffer regarding relaying message to client	.1
10/14/15	JW	Reviewed e-mail from Fifth Third Counsel regarding position on discovery and settlement discussion for status conference	.1
10/14/15	JW	Reviewed discovery responses and correspondence in preparation for status conference	.4
10/15/15	JW	Attended telephonic status conference	.4
10/15/15	JW	Reviewed status conference minutes	1.0
10/30/15	JW	Reviewed e-mail from Jim Burke regarding Fifth Third Settlement offer	.1
10/30/15	JW	Corresponded with co-lead via multiple emails regarding	
11/5/15	JW	Conferred via email with co-lead regarding	.2
11/10/15	JW	Reviewed e-mail from Karl Fanter regarding status of esi protocol search	-,1
11/11/15	JW	Conferred with co-lead via multiple emails regarding	
11/11/15	JW	Reviewed Jim Burke's email regarding refusal to mediate unless Plaintiff's counteroffer	.1

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Date	Attorney	Description	Time
11/12/15	JW	Reviewed e-mail from Karl Fanter regarding rescheduling status conference	.1
11/12/15	JW	Reviewed e-mail from Jim Burke confirming refusal to mediate due to Plaintiffs not willing to make counteroffer	.1
11/16/15	JW	Reviewed Notice of Rescheduling Status Conference.	.1
11/25/15	JW	Prepared for status conference	.9
11/25/15	JW	Attended status conference	.6
11/25/15	JW	Reviewed minute entry regarding request from judge for ex parte summary for purposes of mediation	.1
12/4/15	JW	Reviewed initial draft of mediation letter to Judge Barrett	.2
12/5/15	JW	Reviewed comments and suggestions for edits from co-lead	.4
12/7/15	JW	Edited initial draft of mediation letter to Judge Barrett	1.9
12/8/15	JW	Continued to prepare mediation letter to Judge Barrett	.4
12/9/15	JW	Reviewed and edited final draft of letter to Judge Barrett	.6
12/12/15	JW	Quarterly review of firm cases; Status update on Fifth Third. Discussed status of settlement offer. Discussed status conference. Discussed mediation and discussed mediation settlement statement. Advised of updated costs and discussion of projected costs moving forward.	1.7
3/19/16	JW	Quarterly review of firm cases; Status update on Fifth Third. Discussed settlement status and strategy for mediation.	.7
6/23/16	JW	Conferred with co-counsel regarding	.8
6/25/16	JW	Quarterly review of firm cases; Status update on Fifth Third. Reviewed proposed letter sent to Judge regarding settlement conference	.9
9/7/16	JW	Corresponded with co-counsel regarding	.3
9/9/16	JW	Reviewed FTB Term Sheet	.2
9/9/16	JW	Prepared e-mail to co-lead regarding review of FTB Term Sheet	.1
9/9/16	JW	Reviewed emails of co-lead counsel regarding FTB Term Sheet	.1

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Date	Attorney	Description	Time
9/10/16	JW	Reviewed e-mail from co-lead to Judge Barrett's clerk regarding FTB Term Sheet	.1
9/15/16	JW	Prepared summary of settlement negotiations to non-lead counsel	,1
9/20/16	JW	Reviewed email from Hassan regarding	1
9/21/16	JW	Prepared email to non-lead counsel regarding	.1
9/23/16	JW	Reviewed proposed term sheet for settlement	.2
9/23/16	JW	Reviewed email from Hassan regarding joining settlement conference call with Court	.1
9/24/16	JW	Quarterly review of firm cases, Status update on Fifth Third, Discussed Fifth Third Term Sheet.	1,2
9/26/16	JW	Telephone conference with co-counsel in preparation for call with Court	.3
9/26/16	JW	Reviewed issues to be raised by Plaintiffs in settlement conference with Court	.1
9/26/16	JW	Settlement conference with defense counsel and Judge Barrett	.5
9/26/16	JW	Prepared Summary of settlement conference call with defense counsel and Judge Barrett sent to non-lead counsel	.1
9/26/16	JW	Telephone conference with Lori Laskaris	.3
9/29/16	JW	Conferred via emails with co-counsel regarding final terms of MOU for settlement terms sheet	.4
10/3/16	JW	Reviewed email from Alex Davis	a.l
10/4/16	JW	Reviewed final draft of MOU agreed to with Fifth Third	.2
10/6/16	JW	Reviewed final MOU from defendant	.2
10/6/16	JW	Reviewed email from Fifth Third counsel confirming agreement on final MOU	.1
10/10/16	JW	Reviewed emails between plaintiffs and defense counsel regarding drafting final settlement agreement	,2
10/12/16	JW	Telephone conference with co-counsel regarding needed information from Fifth Third to beginning preparing final settlement agreement	.4

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Date	Attorney	Description	Time
10/13/16	JW	Prepared email to Tiffany Yiatras requesting	.1
10/13/16	JW	Reviewed email from Tiffany Yiatras confirming	.1
10/13/16	JW	Prepared email to non-lead requesting final time reports to date	.1
10/13/16	JW	Reviewed e-mail regarding initial list to provide to Fifth Third for confirmatory discovery for purposes of preparing final settlement agreement	.1
10/13/16	JW	Corresponded via emails with co-counsel regarding additional discovery requests for Fifth Third confirmatory discovery	.3
10/14/16	JW	Reviewed email from Jeff Kaliel regarding number of class members information provided by Fifth Third	.1
10/21/16	JW	Reviewed e-mail from Fifth Third regarding status of request for information for class settlement	.1
11/10/16	JW	Reviewed draft settlement agreement	1.1
11/28/16	JW	Reviewed initial class size information provided by Fifth Third.	-,1
11/30/16	JW	Conference call with co-lead to	.6
12/1/16	JW	Reviewed initial draft of class action settlement	.8
12/12/16	JW	Reviewed email from Defense counsel regarding status of review of initial settlement agreement draft	-,1
12/17/16	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussed settlement status, class size and review of specific terms of settlement. Advised of updated costs and discussion of projected costs moving forward.	1.3
12/22/16	JW	Conference call with co-leads to discuss	.7
12/23/16	JW	Reviewed email correspondence regarding	.3
1/3/17	JW	Reviewed email from Fifth Third counsel confirming availability for conference call	.1
1/4/17	JW	Prepared for conference call with Fifth Third counsel	.4
1/4/17	JW	Telephone conference with defense counsel regarding request to restart mediation talks	.2

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Date	Attorney	Description	Time
1/4/17	JW	Telephone conference with co-counsel to discuss next steps working towards continued mediation.	.3
1/4/17	JW	Researched	1.3
1/9/17	JW	Corresponded with co-counsel regarding	.3
1/11/17	JW	Continued correspondence with co-counsel regarding	.2
1/12/17	JW	Prepared for conference call with defense counsel	.2
1/12/17	JW	Conference call with defense counsel regarding setting up conference with court	.3
1/12/17	JW	Prepared email to co-counsel regarding	.2
1/13/17	JW	Began discussions of	.8
1/13/17	JW	Reviewed proposed email to defense counsel confirming agreement during conference call on 01/12	.2
1/13/17	JW	Reviewed email from defense counsel approving email to Court regarding request for conference	.1
1/13/17	JW	Reviewed email to Judge's clerk regarding request for conference with Judge Barrett	,1
1/13/17	JW	Reviewed draft demand letter	4
1/14/17	JW	Reviewed email from Judge Barrett's clerk regarding checking with the Judge on potential conference	21
1/19/17	JW	Reviewed email to Judge Barrett's clerk requesting status of request for meeting	,
1/25/17	JW	Reviewed email from Defense counsel regarding availability for call with Judge Barrett to discuss request for conference	
1/30/17	JW	Reviewed summary of call with Judge Barrett	
1/30/17	JW	Reviewed and edited various versions proposed demand letter	.:
2/10/17	JW	Reviewed letter from Fifth Third in response to our demand letter	
2/10/17	JW	Corresponded with co-counsel	.:

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Date	Attomey	Description	Time
2/11/17	JW	Continued correspondence with co-counsel regarding	.3
2/15/17	JW	Corresponded with co-counsel regarding	.3
2/16/17	JW	Reviewed and edited letter to Fifth Third regarding additional request for information	.2
2/17/17	JW	Reviewed email from defense counsel in response to our letter	.1
2/28/17	JW	Reviewed email from defense counsel regarding availability for call to discuss additional issues regarding settlement	.1
2/28/17	JW	Corresponded with co-counsel	.4
3/1/17	JW	Reviewed email from defense counsel regarding availability for conference call	.1
3/8/17	JW	Prepared for conference call with Fifth Third	.3
3/8/17	JW	Conference call with Fifth Third counsel	.5
3/9/17	JW	Reviewed and edited drafts of letter to Fifth Third in response to request for specific information requested by plaintiffs	.6
3/10/17	JW	Continued review and revision of potential draft letters to Fifth Third as follow up to conference call	.4
3/10/17	JW	Reviewed final version of email to defense counsel	.1
3/17/17	JW	Reviewed final demand letter to Fifth Third	.1
3/20/17	JW	Reviewed emails from defense counsel regarding availability for conference call	.2
3/20/17	JW	Reviewed email from Judge Barrett's clerk regarding availability for conference call	11
3/22/17	JW	Prepared for conference call with Judge Barrett	.6
3/22/17	JW	Conference call with Judge Barrett	.4
3/22/17	JW	Corresponded with co-counsel on approach to requested letters for Judge Barrett	.3
3/22/17	JW	Reviewed Minute Entry from Judge Barrett	1

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Date	Attorney	Description	Time
3/26/17	JW	Quarterly review of firm cases. Status update on Fifth Third. Status of settlement and discussion of the breakdown of the damages.	1.6
3/29/17	JW	Reviewed and edited proposed ex-parte letter to Judge Barrett	.6
3/30/17	1W	Corresponded with co-counsel regarding mediation letter to Judge Barrett and review of same	.5
3/30/17	JW	Reviewed case law to prepare mediation letter	.2
3/31/17	JW	Continued correspondence with co-counsel regarding mediation letter and review of same	.8
3/31/17	JW	Reviewed final mediation letters to Judge Barrett and to defense counsel	.2
4/12/17	JW	Reviewed Fifth Third's letter to Judge Barrett regarding mediation	.2
6/7/17	JW	Conferred with co-counsel	.3
6/17/17	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed settlement status and proposed breakdown of damages.	.6
8/9/17	JW	Reviewed update on call with Judge Barrett	.1
8/30/17	JW	Reviewed update on scheduled call with Judge Barrett for 9/5/17	.1
9/7/17	JW	Reviewed email from Judge's Clerk regarding scheduling conference call	.1
9/7/17	JW	Prepared email responding to Clerk's email requesting availability for conference call	.1
9/7/1	JW	Reviewed defense counsel's email regarding availability for conference call with Judge	.1
9/11/17	JW	Reviewed Notice of Status Conference for September 20, 2017	.1
9/20/17	KM	Prepared for status conference	.6
9/20/17	KM	Attended Status Conference	.3
9/20/17	JW	Reviewed minute entry of status conference	.1
9/21/17	JW	Prepared summary of conference call with Judge Barrett	.2

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Date	Attorney	Description	Time
9/23/17	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed status conference with Judge and reviewed and discussed summary of status conference. Discussed settlement status.	.9
10/11/17	JW	Reviewed article on reinstatement of payday lending through bank accounts	.3
10/30/17	JW	Reviewed notice of appearance by Jim Burke	.1
11/8/17	JW	Travel to Cincinnati for Mediation	6.2
11/9/17	JW	Prepared for mediation	1.3
11/9/17	JW	Attended mediation	2.6
11/9/17	JW	Reviewed minute entry from mediation	.1
11/9/17	JW	Travel from Cincinnati to Tampa	8.5
12/16/17	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussed Mediation. Discussed pending stay. Discussed appeal	2.1
5/28/19	JW	Corresponded with co-counsel re	.8
5/29/19	JW	Reviewed letter to def counsel re: outstanding discovery	.1
6/3/19	JW	Reviewed daft of 2 <sup>nd</sup> RTP to Def	.2
6/3/19	JW	teleconference with co-counsel	.5
6/6/19	JW	teleconference with co-counsel	.4
6/6/19	JW	Reviewed case law summary from Matt Wessler	.1
6/7/19	JW	Reviewed 6/7/19 letter from Karl Fanter	.1
6/7/19	JW	Reviewed Co-Counsel's research on	.1
6/7/19	JW	Researched	.4

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Date	Attorney	Description	Time
6/10/19	JW	Reviewed Co-Counsel's research	.1
6/10/19	JW	Reviewed Co-Counsel's additional research on	.1
6/10/19	JW	Reviewed Co-Counsel's email with additional	.1
6/10/19	JW	Reviewed research of co-counsel and conducted additional research	.8
6/16/19	JW	Reviewed additional research on	,1
6/20/19	JW	Reviewed Mandate	,1
6/20/19	JW	Prepared Motion for Case Management Conference	.7
6/20/19	JW	Reviewed edits of co-counsel	2
6/20/19	JW	Telephone conference with data expert	
6/20/19	JW	Reviewed statement documents of from client re; data expert call	
6/20/19	JW	Reviewed email from Co-counsel w/ case law re: class certification	:
6/20/19	JW	Reviewed email and memo on	
6/21/19	JW	Finalized motion for case management conference and lift to stay	
6/28/19	JW	Reviewed Order granting Motion for hearing	
6/29/19	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed new strategies moving forward.	2.1
7/1/19	JW	teleconference with co-counsel to prepare for case management conference	,
7/1/19	JW	case management conference	
7/1/19	JW	Reviewed minute entry from court	
7/1/19	JW	began working on draft joint discovery plan	

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Date	Attorney	Description	Time
7/1/19	JW	Reviewed email to defense counsel re: scheduling a time to discuss case schedule	.1
7/1/19	JW	Reviewed email to counsel re; scheduling discovery conference call	.1
7/2/19	JW	Reviewed response email from opposing counsel re: availability for phone conference	.1
7/2/19	JW	Responded to email re: scheduling discovery conference call	.1
7/2/19	JW	revise draft joint discovery plan	.1
7/2/19	JW	review suggested edits from co-counsel re:	.3
7/3/19	JW	revise draft joint discovery plan	.1
7/4/19	JW	Reviewed reply email from Cassis tech	.1
7/8/19	JW	Reviewed Def's responses to discovery in preparation of joint discovery plan	.6
7/10/19	JW	final review of discovery plan draft	.1
7/10/19	JW	review of second set of interrogatories	.1
7/10/19	JW	Preparing email to defense counsel attaching draft joint disc. plan	.1
7/10/19	JW	Reviewed reply email from defense counsel	.1
7/11/19	JW	Phone conf w/ defense counsel re; joint discovery plan	.4
7/11/19	JW	Email from Co-counsel to defense counsel re: scheduling another call	.1
7/11/19	JW	final review of as served Second Interrogatories to Def. copy	.1
7/12/19	JW	Reviewed reply email from Defense counsel re: scheduling a call	.1
7/18/19	JW	Reviewed emails between counsel re: scheduling conference call	.4
7/23/19	JW	Reviewed email from Karl Fanter	.1

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Date	Attorney	<u>Description</u>	<u>Time</u>
7/23/19	JW	Reviewed proposed discovery plan from defense counsel	.1
7/23/19	JW	Reviewed discovery requests and prepared summary in preparation for call with defense counsel	1.1
7/23/19	JW	Conference call with opposing counsel	.2
7/24/19	JW	Prepared letter to Karl Fanter re: supplemental discovery	.6
7/24/19	JW	Reviewed and incorporated edits from co-counsel re: supplemental discovery letter	.1
7/24/19	JW	Prepared email to Karl Fanter attaching supplemental discovery letter.	.1
7/29/19	JW	Reviewed email from opposing counsel re: revised draft of discovery plan	.1
7/29/19	JW	Reviewed revised draft of discovery plan	.1
7/29/19	JW	Prepared reply email to opposing counsel re: draft discovery plan	.1
7/30/19	JW	Reviewed email from opposing counsel re: telephone conference	.1
7/30/19	JW	Prepared reply email to opposing counsel re: telephone conference	.1
7/30/19	JW	Reviewed reply email from opposing counsel re: telephone conference	.1
7/31/19	JW	status conference attendance	.1
7/31/19	JW	Reviewed Minute Entry from Court	.1
8/14/19	JW	Conference w/ opposing counsel to discuss discovery	.1
8/16/19	JW	Reviewed Initial Discovery to Plaintiffs	.4
8/18/19	JW	Reviewed case from the 6 <sup>th circuit</sup>	.3
8/20/19	JW	Reviewed questionnaires from clients for responses to discovery	.7
8/21/19	JW	Reviewed email from co-counsel re: discovery requests	.1
8/21/19	JW	Prepared response email to co-counsel re: discovery	.1

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Date	Attorney	Description	Time
8/22/19	JW	Reviewed email from co-counsel re: discovery	.1
8/22/19	JW	Prepared email to co-counsel re: guidance on discovery	.1
8/23/19	JW	Reviewed def's discovery responses	.3
8/26/19	JW	Reviewed email from co-counsel with proposed responses to Def's RTP	1
8/26/19	JW	Prepared reply emails to co-counsel re: RTP	.1
8/27/19	JW	Reviewed email from co-counsel	.1
8/27/19	JW	Prepared reply email to co-counsel	.1
8/28/19	JW	Prepared initial draft of Plaintiff's Rule 26 disclosures	.8
8/29/19	JW	Conference call with defense counsel	.2
8/30/19	JW	Reviewed records to provide with initial disclosures	1.1
8/30/19	JW	Finalized initial disclosure	.1
8/30/19	JW	Reviewed Def's Rule 26 disclosures	.1
9/5/19	JW	Reviewed email from co-counsel regarding discovery letter	.1
9/5/19	JW	Reviewed discovery to edit letter to opposing counsel for better responses	.4
9/5/19	JW	Prepared reply email to co-counsel	.1
9/6/19	JW	Reviewed email with additional edits.	.1
9/10/19	JW	Reined proposed letter to Defense counsel re: discovery	.1
9/11/19	JW	Reviewed ORDER granting [117] Motion for Leave to Appear Pro Hac Vice of Anna C. Haac	.1
9/11/19	JW	Reviewed proposed answers to interrogatories by Janet Fyock	.3
9/12/19	JW	Reviewed Bank statements for Diana Horn	.2

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Date	Attorney	Description	Time
9/14/19	JW	Reviewed edits of draft responses to RTP by Stuart Scott	.2
9/16/19	JW	Reviewed draft interrogatory answers	,2
9/16/19	JW	Consulted with clients and prepared responses to discovery for Laskaris	1.2
9/16/19	JW	Reviewed additional documents from Janet Fyock	.1
9/18/19	JW	Prepared email to co-counsel re: discovery response	a
9/17/19	JW	Reviewed letter from defense counsel re: their discovery responses	.1
9/17/19	JW	Reviewed email from co-counsel re: documents to produce	.1
9/17/19	JW	Prepared reply email to co-counsel re: documents to produce	.1
9/17/19	JW	Reviewed email from co-counsel re: Diana Horn	.1
9/18/19	JW	Reviewed email from defense counsel re: telephone conference	.1
9/19/19	JW	Prepared for good faith conference call with defense counsel	.4
9/19/19	JW	good faith conference call with defense counsel	.5
9/19/19	JW	Reviewed	.7
9/21/19	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussed recent phone conference with defense counsel. Discussed discovery issues and status of outstanding responses.	.9
9/25/19	JW	Reviewed Ms. Horn's interrogatory responses	.2
9/25/19	JW	Prepared email to lead counsel with Ms. Horn's interrogatory answers	,1
9/25/19	JW	Reviewed and edited draft of consolidated responses to interrogatories	.3
9/25/19	JW	Prepared response email to co-counsel re: suggested edits to interrogatory responses	.1
9/25/19	JW	Reviewed and edited draft of consolidated responses to RTP	.2

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Date	Attorney	Description	Time
9/25/19	JW	Prepared response email to co-counsel re: suggested edits to RTP Reponses	.1
9/27/19	JW	Review of RTP and docs to be produced	,4
9/27/19	JW	Investigate	
9/27/19	JW	Research	.2
9/27/19	JW	Prepared email to co-counsel re:	.1
9/27/19	JW	Reviewed email from lead co-counsel re: RFP Objection	.,
9/27/19	JW	Final review of all interrogatory responses and RFP	.7
9/27/19	JW	Reviewed email from co-counsel on additional edits to answers to interrogatories	.1
9/27/19	JW	Reviewed decelerations for client's signatures	.3
9/27/19	JW	Reviewed edits to discovery from c-counsel Anna Haac.	.2
10/4/19	JW	Reviewed email from defense counsel re: data being processed for production	.1
10/9/19	JW	Reviewed email from defense counsel re: correspondence	.,
10/9/19	JW	Reviewed letter from defense counsel re: Second RTP	
10/11/19	JW	Reviewed email from Co-counsel	.1
10/11/19	JW	Prepared reply email to co-	
10/16/19	JW	Reviewed Notice of Appearance by Dante Marinucci	.1
10/16/19	JW	Reviewed NOTICE of Appearance by Sam Anthony Camardo	3
10/16/19	JW	Reviewed AMENDED ANSWER to [68] Amended Complaint	.2
10/23/19	JW	Prepared email to OC re: discovery password	
10/23/19	JW	Reviewed reply email from OC sating FTP was only good for a period of time	1

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Date	Attorney	Description	Time
10/23/19	JW	Prepared follow-up email to OC	.1
10/23/19	JW	Reviewed email from OC re: link to discovery	.1
10/23/19	JW	Reviewed email from OC re: FTP for other co-counsel	.1
10/23/19	JW	Reviewed email from OC re: art Olsen	.1
10/23/19	JW	Prepared reply email to OC re; art Olsen	,1
10/23/19	JW	Prepared email to Art Olsen	.1
10/23/19	JW	Reviewed email from OC with new FTP info	.1
10/24/19	JW	Prepared email to OC requesting zip password	.1
10/24/19	JW	Reviewed reply email from OC with zip password	.1
10/24/19	JW	Prepared email to Art Olsen w/ compliance declaration sheet	.1
10/24/19	JW	Reviewed reply email from Art Olsen	.1
10/24/19	JW	Reviewed declaration signed by Art Olsen	.1
10/24/19	JW	Reviewed email to defense counsel with singed declaration sheet	.1
10/28/19	JW	Reviewed email from Art Olsen advising he was able to download production	.1
10/29/19	JW	Reviewed payday loan summary	1
10/29/19	JW	Reviewed email from co-counsel re: description of codes	.1
10/29/19	JW	Reviewed email from defense counsel attaching letter and NOD	.1
10/29/19	JW	Reviewed 10/29/19 letter from defense counsel	.1
10/29/19	JW	Reviewed NOD of Lori Laskaris	.1
10/29/19	JW	Reviewed NOD of Diana Horn	1

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Date	Attorney	Description	Time
10/29/19	JW	Reviewed NOD of Danielle Laskaris	.1
10/29/19	JW	Reviewed NOD of Williams Klopfenstein	.1
10/29/19	JW	Reviewed NOD of Lyn Adanich	.1
10/29/19	JW	Reviewed NOD of Adam MCKinney	.1
10/29/19	JW	Reviewed NOD of Donald Adanich	.1
10/29/19	JW	Reviewed NOD of Brian Harrison	.1
10/29/19	JW	Reviewed NOD of Janet Fyouck	.1
10/29/19	JW	Reviewed email from co-counsel about scheduling a meet and confer	.1
10/29/19	JW	Reviewed email from co-counsel about laying out position in writing	.1
10/30/19	JW	Prepared reply email to co-counsel	.1
10/30/19	JW	Reviewed email from Karl Fanter re; production	.1
10/31/19	JW	Reviewed Minute Entry for proceedings held before Judge Michael R. Barrett	.1
10/31/19	JW	Reviewed response email from Fanter re: conferring	.1
10/31/19	JW	Reviewed response email from Fanter confirming the date/time to confer	.1
11/5/19	JW	Prepared for call with co-counsel	1
11/5/19	JW	Conference call with co-counsel	.7
11/5/19	JW	Reviewed email from Arthur Olsen	.1
11/6/19	JW	Reviewed notices and prepared summary email to co-counsel	.6
11/6/19	JW	Prepared email to defense counsel re: depositions	.1
11/6/19	JW	Phn call w/ co -counsel to prepare for call with defense counsel	.4

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Date	Attorney	Description	Time
11/6/19	JW	Conference call with defense counsel	.5
11/7/19	JW	Reviewed Plf's Amended responses to discovery	.3
11/8/19	JW	review and suggest edits to letter re; dismissal of Klopfenstein and Adanich	.2
11/13/19	JW	Received email from OC re: depositions of Laskaris- location & date	-31
11/13/19	JW	Prepared reply email to OC re: depos of Laskaris	,1
11/13/19	JW	Received reply email from OC re: depositions of other clients	1.1
11/13/19	JW	Conferred with Laskaris to reschedule deposition	,2
11/13/19	JW	Prepared reply email to OC re: depos and extension on class discovery deadline	.1
11/13/19	JW	Reviewed email from Art Olsen	,1
11/13/19	JW	Reviewed and edited letter to OC	,2
11/18/19	JW	Reviewed email from Dante Marinucci re; Schedule and discovery deadlines	.1
11/18/19	JW	Reviewed amended notice of depo to d. laskaris	,1
11/18/19	JW	Reviewed amended notice of depo to L. laskaris	.1
11/18/19	KW	Conferred with co-counsel re: Def's request to extend deadlines	,2
11/19/19	JW	Prepared email to Dante Marinucci re: production and depos	.1
11/19/19	JW	Reviewed email from Art Olsen	.1
11/19/19	JW	Reviewed spreadsheet from Art Olsen	,2
11/19/19	JW	Reviewed email from Dante Marinucci re: production and depos	.1
11/19/19	JW	Reviewed update depo notice for D. Laskaris	
11/19/19	JW	Reviewed update depo notice for L. Laskaris	

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Date	Attorney	Description	Time
11/22/19	JW	Reviewed email from D. Marinucci re: production	.1
11/22/19	JW	Reviewed letter from D. Marinucci re: production	.1
11/22/19	JW	Reviewed response re: damages data	.3
11/25/19	JW	Reviewed email from D. Marinucci re: changing depo time	.1
11/26/19	JW	Prepared response email to D. Marinucci	.1
11/26/19	JW	Reviewed email from D. Mainucci re: depo	.1
11/26/19	JW	Reviewed amended notices of deposition	.1
11/26/19	JW	Started review of documents produced by Fifth Third on 11/22/19	.6
11/27/19	JW	Continued review of documents produced by Fifth Third on 11/22/19	.3
11/27/19	JW	Reviewed Notice of Withdrawal by James Burke	.1
11/29/19	JW	Reviewed email from D. Marinucci	.1
11/29/19	JW	Reviewed motion to amend agreed calendar	.1
11/29/19	JW	Reviewed draft proposed order to amend calendar	.1
12/2/19	JW	Reviewed email from D. Marinucci	.1
12/2/19	JW	Reviewed production log	.1
12/2/19	JW	Reviewed records forwarded by co-counsel regarding fifth third terms and conditions	.6
12/2/19	JW	Reviewed good faith email to fifth third regarding terms and conditions	.)
12/4/19	JW	Reviewed email from OC re; Mtn to Amend Calendar	.1
12/4/19	JW	Prepared response email to OC	.1
12/5/19	JW	Finished reviewing documents produced by Fifth Third on 11/22/19	.9

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Date	Attorney	Description	Time
12/5/19	JW	Reviewed email from OC re: adding signature to joint motion	.1
12/5/19	JW	Prepared response email to OC	.1
12/6/19	JW	Reviewed email from OC re: proposed order	.1
12/9/19	JW	reviewed email from Dante Marinucci regarding good faith letter	,1
12/9/19	JW	Reviewed good faith letter from Fifth third counsel	.1
12/9/19	JW	Prepared for telephone conf w/ co-counsel re; discovery	.5
12/9/19	JW	Phn conf w/ co-counsel re: discovery	.9
12/9/19	JW	Reveiwed and edited proposed letter to 5/3 re discovery disputes	.3
12/10/19	JW	Research cases	.9
12/10/19	JW	Review analysis by co-counsel regarding	.1
12/12/10/19	JW	Review interrogatory answers regarding Horn	.1
12/11/19	JW	began preparation for deposition prep of laskaris	.6
12/11/19	JW	Begin preparing revised discovery response from Horn	.1
12/11/19	JW	Sent email to Horn	.1
12/11/19	JW	Sent email to Fyock	,,
12/11/19	JW	Research	.1
12/12/19	JW	conference regarding plaintiff's availability for deposition	.3
12/13/19	JW	prepare email to defense counsel regarding Fyock and Harrison Deposition	.1
12/14/19	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed upcoming depositions and preparation of witnesses. Discussed discovery issues and status of responses. Discussed discovery disputes.  Advised of updated costs and projected costs moving forward.	1.3

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Date	Attorney	Description	Time
12/16/19	JW	Reviewed Order granting Joint Motion to Amend Agreed Calendar	.1
12/16/19	JW	Reviewed Laskaris documents for deposition	2.6
12/16/19	JW	Prepared summary of APR disclosures in Fifth-Third documents	.7
12/16/19	JW	Prepared for deposition prep telephone conference with Laskaris	1.1
12/16/19	JW	telephone conference with Laskaris	1.7
12/18/19	JW	Prepared for meeting with clients	1.3
12/18/19	JW	travel to deposition prep with clients	.9
12/18/19	JW	deposition prep of Laskaris	4.0
12/18/19	JW	travel from deposition prep of clients	.9
12/18/19	JW	reviewed final letter regarding discovery disputes	,1
12/18/19	JW	review email regarding Fyock deposition prep availability	.1
12/18/19	JW	prepare text to counsel regarding Fyock deposition prep	.1
12/19/19	JW	continued deposition prep of clients	2.0
12/19/19	JW	attend deposition of Lori Laskaris	4.2
12/19/19	JW	deposition of Daniel laskaris	3.0
12/19/19	JW	conference with co-counsel regarding remaining discovery issues, needs, etc.	2.3
12/19/19	JW	review email from co-counsel regarding ATM disclosures for Fifth Third	.2
12/20/19	JW	Reviewed final draft of letter to OC re: discovery dispute	.1
12/20/19	JW	Reviewed PDF of final ltr re: discovery dispute	.1
12/23/19	JW	Reviewed email from OC re: depositions	.1

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Date	Attorney	<u>Description</u>	Time
12/23/19	JW	Reviewed Mtn to Appear pro hac Erich Schork	.1
12/23/19	JW	Prepared response email to OC re: depositions	.1
12/26/19	JW	Reviewed email from K. Hulick re: MTD for Horn	.1
12/26/19	JW	preparing email to Horn	.1
12/26/19	JW	Reviewed and edit Fifth Third 30b6 draft notice	.8
12/27/19	JW	Reviewed Order granting Mtn to Appear pro hac Erich Schork	.1
12/30/19	JW	preparing for phone conference with co-counsel regarding 30b6 depo and depositions	.6
12/30/19	JW	telephone conference with co-counsel regarding 30b6 notice and depositions	.7
12/30/19	JW	emails to Tiffany Yiatris re: Fyock deposition	.2
12/30/19	JW	emails to Alex Davis re: Harrison deposition	.2
12/30/19	JW	Prepared email to co-counsel re: deposition location	.1
12/30/19	JW	Reviewed response email from co-counsel re: deposition location	.1
12/30/19	JW	Prepared email to co-counsel re: Harrison depo availability	.1
12/30/19	JW	Reviewed response email from co-counsel re: Harrison	.1
12/31/19	JW	Reveiwed final 30b6 notice	.1
1/2/20	JW	Reviewed Def's language for dismissal of Adanich plaintiff	.1
1/2/20	JW	Prepared email to co-counsel re: MTD and docs re: Horn	.1
1/2/20	JW	Reviewed response email from co-counsel re: Horn	.1
1/3/20	JW	Reviewed STIPULATION of Dismissal of Plaintiff Lyn Adanich	.1
1/3/20	JW	Reviewed NOTICE by Plaintiffs Donald E. Adanich	.1

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Date	Attorney	Description	Time
1/4/20	JW	Prepared initial email to Brian Harrison re	.1
1/4/20	JW	Reviewed Mr. Harrison's response email	3.1
1/4/20	JW	Prepared response email to Mr. Harrison	.1
1/6/20	JW	Coordinated deposition of Mr. Harrison	_7
1/6/20	JW	Prepared email to defense counsel re: harrison Deposition	.1
1/6/20	JW	reviewing details of McKinney deposition	.1
1/7/20	JW	Reviewed Notice of Appearance by Kevin C. Hulick	.1
1/8/20	JW	Reviewed draft of Motion to Dismiss for Klopfenstein and Horn	.1
1/8/20	JW	Prepared email to co-counsel approving draft of MTD	.1
1/8/20	JW	corresponding with Harrison re	.4
1/8/20	JW	correspond with co-counsel regarding deposition logistics and preparation	.5
1/8/20	JW	review deposition transcript of Lori Laskaris	.9
1/8/20	JW	review deposition transcript of Daniel Laskaris	.6
1/8/20	JW	email to defense counsel regarding deposition date of harrison (check the date I sent to Dante)	-,1
1/8/20	JW	review edit and correspond with co-counsel re additional discovery	.4
1/8/20	JW	Reviewed bankruptcy docket for Horn	.1
1/8/20	JW	Reviewed f/U email form co-counsel to Defense counsel re: 12/20/20 discovery letter	.1
1/8/20	JW	Reviewed 1/8/20 letter re: discovery	.2
1/9/20	JW	continued review and edit and correspondence with co-counsel re additional discovery	.2
1/9/20	JW	review as served discovery	.1

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Date	Attorney	Description	Time
1/9/20	JW	Reviewed prior settlement letter to prepare discovery	.2
1/9/20	JW	corresponding with co-counsel regarding	.3
1/10/20	JW	Reviewed Plf Depo	.3
1/13/20	JW	Reviewed Fyock documents for deposition	.3
1/13/20	JW	reviewing email and attachments regarding Fifth Third letter re: additional statement production	,2
1/13/20	JW	corresponded with co-counsel regarding outstanding discovery from fifth third	.3
1/16/20	JW	Reviewed draft letter of 1/16/20 ltr to OC re: discovery Deficiencies and correspondence with co-counsel regarding edits	.2
1/16/20	JW	Reviewed email from OC re: Fyock deposition, Harrison and McKinney	.1
1/16/20	JW	Reviewed revised NOD re: Fyock	.)
1/17/20	JW	reviewing draft of 1/17/20 ltr to OC re: 30bv6 objections with edits	.2
1/17/20	JW	review of final discovery deficiencies response letter	.1
1/18/20	JW	Reviewed email re: Notice of Harrison Depo	.1
1/18/20	JW	Reviewed NOD for Brian Harrison	.1
1/21/20	JW	telephone conference with co-counsel regarding discovery response letter	.5
1/21/20	JW	Reviewed final ltr to Fifth Third re: 30b6 objections	.1
1/22/20	JW	preparing for Harrison prep session	1.2
1/22/20	JW	attending Fyock deposition by telephone	3.0
1/23/20	JW	Reviewed email from Defense counsel	.1
1/23/20	JW	travel to Nashville for deposition prep of Brian Harrison	3.8
1/23/20	JW	prepare for deposition prep of Brian Harrison	1.

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Date	Attorney	Description	Time
1/23/20	JW	deposition preparation of Brian Harrison	4.0
1/23/20	JW	travel from Nashville to Tampa	6.0
1/26/20	JW	correspond with co-counsel regarding plaintiffs in bankruptcy, demand, and 30b6	,2
1/27/20	JW	Prepared for conf call re: 30b6 deposition	.4
1/27/20	JW	conference call with co-counsel re: demand and 30b6	1.
1/27/20	JW	conference call with opposing counsel regrading 30b6 scope	1.
1/27/20	JW	corresponding with co-counsel regarding damage calculation for mediation	.4
1/27/20	JW	reviewing records regarding changes in terms and conditions on this date	.3
2/3/20	JW	Reviewed email from OC	.1
2/3/20	JW	Reviewed 5/3's letter re: discovery	.1
2/4/20	JW	Travel to Nashville	5.0
2/4/20	JW	Prepare for depo prep of Brian Harrison	2.3
2/4/20	JW	Depo Prep of Brian Harrison	2.8
2/4/20	JW	continue research and preparation regarding class period	4.1
2/5/20	JW	prepare for Harrison Deposition	1.5
2/5/20	JW	Harrison Deposition	3.
2/5/20	JW	Return travel from Nashville	7.
2/5/20	JW	Reviewed email from OC re: deposition of McKinney	.1
2/7/20	JW	Corresponded w/ co-counsel re: 30b6 Deposition	.3
2/10/20	JW	Reviewed email re: revised depo notice for Adam McKinney	.1

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Date	Attorney	<u>Description</u>	Time
2/10/20	JW	Reviewed Amended Notice of Taking Deposition	.1
2/10/20	JW	Reviewed email from OC attaching Discovery Responses	.1
2/10/20	JW	Reviewed discovery responses to 2 <sup>nd</sup> set of RFPs and Responses to 3 <sup>rd</sup> Set roggs	.3
2/11/20	JW	prepared for conference call with co-counsel regarding demand letter	.5
2/11/20	JW	telephone conference with co -counsel regarding demand letter and 30b6 deposition	.5
2/11/20	JW	Reviewed email from OC to Co-counsel re: availability of witness and topics of 30b6 depo	.1
2/14/20	JW	Reviewed email from OC to Co-counsel- with possible dates for 30(b)(6) deposition	.1
2/15/20	JW	corresponding with co-counsel regarding timing of 30b6 deposition and deadline to submit ex parte paper to the Court for settlement conference.	.5
2/18/20	JW	Reviewed email from OC to Co-counsel re: 30(b)(6) deposition date.	.1
2/18/20	JW	corresponding with co-counsel regarding finalizing date of 30b6 deposition	.4
2/18/20	JW	Reviewed email from OC regarding location of 30(b)(6) deposition	
2/20/20	JW	Reviewed MOTION for Leave to Appear Pro Hac of Enu A. Mainigi	.,
2/20/20	JW	Reviewed MOTION for Leave to Appear Pro Hac of Craig D. Singer	.,
2/20/20	JW	Reviewed MOTION for Leave to Appear Pro Hac of Kenneth C. Smurzynski	,1
2/20/20	JW	Reviewed MOTION for Leave to Appear Pro Hac of Risha Asokan	.1
2/24/20	JW	Reviewed the NOTICE of Hearing:	
2/24/20	JW	Reviewed email from OC re: start time of 30(b)(6) depo	
2/24/20	JW	Reviewed email from Karl Fanter re: rescheduling mediation conference	1
2/24/20	JW	Corresponded with co-counsel regarding moving settlement conference date	2.2

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Date	Attorney	<u>Description</u>	Time
2/24/20	JW	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Enu A. Mainig	.1
2/24/20	JW	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Craig D. Singer	.1
2/24/20	JW	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Kenneth C. Smurzynski	.1
2/24/20	JW	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Risha Asokan	.1
2/25/20	JW	Reviewed the transcript of the Brian Harrison Deposition	.5
2/27/20	JW	reviewed Stu Scott responses to suggested edits to Ex parte ltr and correspondence with co-counsel	.2
3/1/20	JW	review draft exparte letter and corresponded with counsel regarding edits	.9
3/4/20	JW	Reviewed email re: Laskaris Bankruptcy Trustee office	.1
3/4/20	JW	Prepared email to OC re: Laskaris Bankruptcy Trustee office	.1
3/5/20	JW	Reviewed email from OC w/ %/3's 4th production of documents	.1
3/5/20	JW	reviewing additional production from Fifth Third	1.6
3/5/20	JW	Reviewed ltr from OC re: 4 <sup>th</sup> production of documents and password	.1
3/6/20	JW	review and revise ex parte letter to judge regarding settlement conference	1.1
3/9/20	JW	review and edit additional ex parte draft letter to Judge Barrett	.5
3/11/20	JW	Corresponded with co-counsel regarding recent production	.2
3/11/20	JW	review correspondence to Fifth Third regarding recent production without metadata	.1
3/12/20	JW	Correspond with co-counsel regarding remotely taking 30 b 6 deposition	.6
3/13/20	JW	Reviewed email from OC to co-counsel re: metadata	.1
3/16/20	JW	Reviewed email from OC to co-counsel re: 30 b6 depo	.1

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Date	Attorney	Description	<u>Time</u>
3/16/20	JW	corresponding with co-counsel regarding whether to forgo 30 b6 in advance of settlement conference given Corona virus	.3
3/16/20	JW	Reviewed email from Co-counsel to OC	.1
3/16/20	JW	Reviewed reply email from OC re: 30(b)(6) Deposition	.1
3/16/20	JW	Reviewed reply email from co-counsel re: 30(b)(6) Deposition	.1
3/16/20	JW	Reviewed email from OC 30(b)(6) Deposition	.1
3/16/20	JW	for telephone conference with co-counsel regarding settlement conference	.8
3/17/20	JW	reviewing records and preparing draft demand letter on March 17	2.1
3/18/20	JW	review co-counsel edits to demand letter	.2
3/22/20	JW	corresponding re: mediation moving forward given corona virus	.3
3/23/20	JW	Final review and edits to demand letter	.2
3/24/20	JW	Reviewed email from Judge Barrett's clerk regarding mediation	.1
3/25/20	JW	review and edit final draft mediation statement	.4
3/25/20	JW	Reviewed stuarts final edits to mediation statement to judge	.2
3/26/20	JW	telephone conference with co-counsel regarding scheduling of case moving forward	1.0
3/27/20	JW	Reviewed Notice from Court re: settlement conf being changed to status conf and updated calendar	.1
3/27/20	JW	Reviewed stuart scott edits to letter to fifth third regarding status conference and effect of virus on procedure of case	.1
3/27/20	JW	reviewed final letter sent to opposing counsel regarding covid	.1
3/27/20	JW	Reviewed and edited letter to opposing counsel regarding scheduling conference	.2
3/28/20	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed recent depositions of Fyock, Harrison. Discussed email from counsel of 30(b)(6) deposition and proposed edits. Discussed and reviewed demand letter. Discussed covid status on case and issues moving forward. Discussed mediation and proposed strategies	1.5

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Date	Attorney	Description	Time
3/30/20	JW	reviewing follow up email to opposing counsel regarding discovery letter in relation to COVID 19	.1
3/31/20	JW	Reviewed email between counsel re: phone conference	,1
4/2/20	JW	Review draft email to opposing counsel, edits and provided edits	.3
4/2/20	JW	prepare for call with opposing counsel regarding deadlines in light of COVID	.3
4/2/20	JW	telephone conference with opposing counsel regarding deadlines in light of COVID	.5
4/2/20	JW	telephone conference with co-counsel as follow up to call with opposing counsel	.4
4/2/20	JW	Reviewed final email sent to defense counsel as follow up on call re: discovery in light of COVID	.1
4/5/20	JW	corresponded regarding strategy for 30b6 regarding notice of amendment of terms and conditions	.4
4/5/20	JW	reviewing Fifth Third's publications regarding staying operational during COVID	.1
4/6/20	JW	Reviewed letter from opposing counsel re: follow up to outstanding discovery and COVID conference call	.2
4/6/20	JW	call with co-counsel in preparation for status conference	.8
4/6/20	JW	status conference via telephone conference	.5
4/6/20	JW	Reviewed Minute Entry for status conference	.1
4/8/20	JW	reviewed email from Anna Haac regarding Small case class cert introduction	.1
4/10/20	JW	began preparing introduction and background for motion for class certification	.8
4/10/20	JW	review correspondence regarding TILA and breach of contract statute of limitations for purposes of defining class	.2
4/11/20	JW	continued preparing introduction and background for motion for class certification	4.2
4/12/20	JW	continued preparing introduction and background for motion for class certification	1.1
4/12/20	JW	prepared biography for class certification	.7

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Date	Attorney	Description	Time
4/13/20	JW	begin research on motion for summary judgment	.7
4/14/20	JW	begin revisions of motion for class certification full draft	1.2
4/15/20	JW	reviewing email to opposing counsel regarding confidentiality designations and redactions for motion for class certification	.1
4/15/20	JW	continued working on draft class certification	.7
4/15/20	JW	telephone conference with co-counsel to discuss class definition and other drafting issues for class certification brief	.7
4/16/20	JW	Continued review and revisions of class certification brief	1.8
4/16/20	JW	Review and edit Declaration to Appoint Class Counsel	.3
4/16/20	JW	reviewing email regarding additional production from Fifth Third	.1
4/16/20	JW	for reviewing email from defense counsel regarding call on confidentiality designation	1,1
4/16/20	JW	reviewing letter from Fifth Third regarding production of documents	.1
4/17/20	JW	review and edit Olsen declaration	.4
4/17/20	JW	review edits from Stuart Scott to Class Cert brief	.6
4/18/20	JW	research TILA	.6
4/18/20	JW	conference call with co-counsel regarding class definitions and Art Olsen Declaration	.7
4/20/20	JW	reviewed correspondence with co-counsel regarding final edits to motion for class certification	.3
4/20/20	JW	review final version and edits for class certification brief.	1,3
4/20/20	JW	review and edit proposed order granting motion for class certification	.2
4/20/20	JW	for reviewing Stu Scotts edits and final revisions by group to motion for class certification	.4
4/22/20	JW	reviewed email from defense counsel regarding agreement to file unredacted motion for class certification	.1
4/24/20	JW	Research	1.4

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Date	Attorney	Description	Time
4/24/20	JW	continued preparation of draft introduction and legal standard to motion for summary judgment	3.2
4/26/20	JW	continued preparation of draft introduction re motion for summary judgment	.8
4/27/20	JW	continued preparation of draft introduction re motion for summary judgment	.2
4/28/20	JW	continue preparation of introduction and legal standard to motion for summary judgment	.7
4/29/20	JW	review transcripts of laskaris, harrison, and McKinney to prepare motion for summary judgment	1.8
4/29/20	JW	continued preparation of introduction and legal standard to motion for summary judgment	.6
5/5/20	JW	review and edit plaintiff's motion for summary judgment	1.4
5/14/20	JW	reviewing the email from opposing counsel requesting back up information from Art Olsen	.1
5/18/20	JW	conference call with co-counsel regarding outstanding discovery issues related to class certification	.8
5/18/20	JW	review and edit proposed email to opposing counsel regarding 30b6 and updated declarations	.4
5/19/20	JW	reviewing final draft of email to opposing counsel regarding 30 b6 deposition and art Olsen declarations	.1
5/21/20	JW	Research	2.6
5/22/20	JW	continued research	.6
5/23/20	JW	continued research	.2
5/27/20	JW	reviewing email to opposing counsel regarding status conference	.1
5/27/20	JW	Reviewed email from Opposing counsel re: status conference	.1
6/1/20	JW	telephone conference with co-counsel and art Olsen regarding data production of	1
6/1/20	JW	prepare email to opposing counsel regarding 30b6	.2

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Date	Attorney	<u>Description</u>	<u>Time</u>
6/3/20	JW	review email from defense counsel regarding position on reliance on document production for response to motion for class certification	.1
6/3/20	JW	call with co-counsel prior to status conference to discuss strategy	.8
6/3/20	JW	telephonically attend status conference	.6
6/3/20	JW	follow up call with co-counsel to discuss mediation dates	.2
6/3/20	JW	Reviewed minute entry from the Court	.1
6/3/20	JW	reviewing email from co-counsel to opposing counsel regarding availability for mediation	.1
6/8/20	JW	reviewing follow up email from Judge Barrett's law clerk regarding scheduling mediation	.1
6/9/20	JW	reviewing email from Judge Barrett's law clerk confirming mediation date.	.1
6/9/20	JW	Reviewed email between counsel re: availability for settlement conf	.1
6/10/20	JW	Reviewed Notice of Settlement Conference	.1
6/20/20	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed TILA statute and properly defining class. Discussed class certification status. Discussed Ohio summary judgment statute and preparation for strategies moving forward based on findings of appellate court. Discussed on going discovery. Discussed proposed mediation dates and work around with Covid. Discussed ex-parte position to be sent to Judge. Discussed notice of settlement conference and strategies to be implemented.	2.3
7/8/20	JW	review email to opposing counsel regarding data request	.1
7/17/20	JW	email from defense counsel regarding request to file confidential documents without seal	.1
7/17/20	JW	reviewing exhibit attached to defense counsel email regarding filing under seal	.1
7/17/20	JW	co-counsel regarding defendant's request to file documents publicly in support of response to motion for class certification	.3
7/17/20	JW	review email from defense counsel regarding motion to seal	.1
7/17/20	JW	review proposed order regarding motion to seal	.1

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Date	Attorney	Description	Time
7/17/20	JW	review defendants' motion to file under seal	.1
7/18/20	JW	response in opposition to motion for class cert and exhibits filed by Fifth Third	2.1
7/19/20	JW	research	3.3
7/20/20	JW	researching	2.7
7/20/20	JW	edited ex parte letter to judge regarding	1.2
7/21/20	JW	Reviewed notice of scaled document	.1
7/21/20	JW	Reviewed ORDER granting [139] Motion to File Document Under Seal	.1
7/22/20	Jw	review, edit and finalize ex parte position paper to Judge Barrett	2.3
7/23/20	JW	Continued editing ex parte mediation statement and research regarding	1.4
7/24/20	JW	finalize ex parte position paper for mediation	2.3
7/28/20	JW	prepared email to defense counsel regarding stipulation on reply deadline	.1
7/29/20	JW	review of email from defense counsel agreeing to stipulation for deadline to file reply brief	.1
7/29/20	JW	responded email from defense counsel agreeing to stipulation for deadline to file reply brief.	.1
7/31/20	JW	prepare joint stipulation to propose deadline for reply brief	,5
7/31/20	JW	email to defense counsel sending draft stipulation for deadline for reply brief	.1
7/31/20	JW	reviewing email from defense counsel confirming approval of proposed joint stipulation	.1
7/31/20	JW	responding to email from defense counsel regarding confirming approval for proposed joint stipulation	.1
8/6/20	JW	Reviewed Order granting Joint stipulation to extend deadline for plf to file Reply in support of Class Certification	
8/6/20	JW	review COVID travel restrictions for New York, D.C. and Ohio in response to Defendant's request to postpone mediation	-1

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Date	Attorney	Description	Time
8/10/20	JW	conference call with co-counsel regarding mediation	.3
8/11/20	JW	status conference with Court regarding mediation.	.3
8/11/20	JW	Reviewed minute entry from court	.1
8/14/20	AW	research	1.2
8/14/20	JW	began preparing voluntary payment and bankruptcy section for reply for class cert	.8
8/14/20	JW	researched	2.1
8/16/20	JW	continued research	1.3
8/18/20	JW	continued preparing bankruptcy and voluntary payment doctrine portion of reply brief for class cert	2.3
8/19/20	JW	continued preparing reply section for class certification	.9
8/20/20	JW	continued preparing voluntary payment and bankruptcy sections for reply	1.9
8/21/20	JW	finalize initial draft of voluntary payment and bankruptcy sections for reply	.7
8/24/20	JW	research, prepare and finalize initial reply section regarding individual understanding of 10% fee and continued payment	3.8
8/31/20	JW	continued review and edits to reply in support of certification	1.6
9/1/20	JW	continued review and edit of reply in support of class certification	1.8
9/2/20	JW	final review of reply in support of class certification	.8
9/15/20	JW	reviewing defense counsel's response as to why sur-reply necessary	.1
9/15/20	JW	prepare response email to defense counsel regarding sur-reply request	.1
9/15/20	JW	reviewing defense counsel's request to file sur-reply	.1
9/23/20	JW	review email from Judge Barrett's clerk confirming receipt of confidential mediation statement	7.1

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Date	Attorney	Description	Time
9/23/20	JW	reviewing notice of status conference	.1
9/23/20	JW	conference call with co-counsel regarding meeting with Judge Barrett	.6
9/24/20	JW	review exhibits to depositions and prepared summary of changes to terms and conditions re: Early Access program.	.8
9/24/20	JW	telephonically attend status conference	.3
9/24/20	JW	for conference call with co-counsel following up on settlement conference.	.2
9/24/20	JW	review of status conference minutes	.1
9/24/20	JW	Reviewed Minute Entry for proceedings	.1
9/26/20	JW	review and edit opposition to Fifth Third's motion to file sur-reply	.2
9/26/20	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed proposed mediation and issues re: Covid. Discussed bankruptcy issues and impact on class. Discussed class certification and TILA claims.  Discussed mediation statement sent to judge	1.4
9/27/20	JW	reviewed pleadings and evidence in preparation of mediation	2.2
9/28/20	JW	continued preparation for mediation	1.4
9/28/20	JW	reviewing proposed order denying motion for sur-reply	.1
9/28/20	JW	telephonically attending settlement conference	1.8
9/30/20	JW	Reviewed Minute Entry for settlement conference	.1
12/19/20	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussed settlement conference. Advised of updated costs and projected costs moving forward.	.3
2/1/21	JW	telephone conference with co-counsel regarding preparing additional discovery	.5
2/5/21	JW	review order granting defendant's motion to file sur-reply	.1
2/5/21	JW	review Fifth Third's Sur-Reply in opposition to class certification	.2

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Date	Attorney	Description	Time
2/9/21	JW	review discovery and prepare supplemental roggs and rtps regarding continued breach	1.3
2/23/21	JW	review notice of withdrawal of counsel Risha Asokan	.1
3/26/21	JW	review court's order granting motion for class certification	.3
3/26/21	JW	research	.4
3/26/21	JW	telephone conference with co-counsel regarding motion for class certification	.2
3/31/21	JW	Research	.7
4/3/21	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed granting of class certification. Discussed potential appeal by Fifth Third.	.5
4/6/21	JW	review Fifth Third Motion to allow Amy Mikinlay to appear pro hac vice	.1
4/7/21	JW	prepare Lori and Daniel Laskaris	.2
4/9/21	JW	review draft email to Fifth Third counsel regarding class notice discovery	.1
4/9/21	JW	reviewed email from Epiq Global regarding information necessary for notice to class	.1
4/15/21	JW	review order granting pro hac motion for Amy McKinlay	.1
4/15/21	JW	review edits to email to defense counsel requesting timeline on meet and confer	.1
4/19/21	JW	for reviewing email from Fifth Third counsel giving update on request for class notice information request.	.1
4/20/21	JW	review finalized 4th roggs and 3rd rtp to fifth third	.2
4/20/21	JW	review email from defense counsel regarding link to newly served discovery	.1
4/21/21	JW	review email from Fifth Third counsel requesting discovery in another link.	.1
4/23/21	JW	review email from Enu Mainigi regarding scheduling call to discuss notice information	1
4/22/21	JW	review Epiq proposed class notification declaration	.3

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Date	Attorney	Description	Time
4/26/21	JW	review email from Fifth Third counsel re: available times for conference call	.1
4/22/21	JW	review email from Cam Azari regarding information needed to prepare adequate notice to class members	.1
4/22/21	JW	correspond with Laskaris	.2
4/22/21	JW	review statements provided by Laskaris	.3
4/27/21	JW	telephone conference with defense counsel regarding notice to class	.5
4/27/21	JW	review email from Epiq regarding information needed on former addresses.	.1
4/29/21	JW	review email from Cam Azari regarding draft certification notice	.1
4/29/21	JW	review draft notice from Epiq	.4
5/7/21	JW	review email from Fifth Third counsel confirming status of request for information necessary to provide notice to class	J
5/14/21	JW	review email form Fifth Third counsel regarding status of notice information.	.1
5/18/21	JW	review email from Fifth Third Counsel regarding draft Calendar Order and discovery status	.1
5/18/21	JW	review draft calendar order from defendant	.2
5/18/21	JW	review class certification order regarding findings related to discovery	.4
5/18/21	JW	review prior case management orders to determine if court ever bifurcated discovery	.5
5/18/21	JW	zoom conference with counsel regarding proposed case management deadlines and discovery issues	.8
5/19/21	JW	review draft notice plan and declaration of Epiq representative	.8
5/19/21	JW	review notice plan	.6
5/19/21	JW	review azari class notice plan	.3
5/20/21	JW	review correspondence and discovery regarding Defendant's request to revisit plaintiff's discovery	.9
5/20/21	JW	review Fifth Third discovery responses to 4th roggs and 3rd RFPs	.5

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Date	Attorney	Description	Time
5/21/21	JW	research law	1.8
5/21/21	JW	prepare response to defendant's request for bankruptcy discovery	1,2
5/21/21	JW	review email from Fifth Third providing notice information for class	,1
5/24/21	JW	review revised draft notice plan	.4
5/24/21	JW	conference call regarding finalized notice plan to send to Fifth Third	.6
5/24/21	JW	review final draft of notice plan	,2
5/24/21	JW	review and edit draft case management report	1.2
5/24/21	JW	review email from Epiq regarding follow up question on cost of class cert notice	J.
5/24/21	JW	continued review of notice plan draft	.7
5/25/21	JW	continued preparation of plaintiff's position on case management order	.9
5/26/21	JW	finalize group case management order for plaintiff's position	1.2
5/26/21	JW	review final class administration notice	.3
5/27/21	JW	review 30b6, notice plan final and calendar order final before it is sent to opposing counsel	1.1
5/28/21	JW	review suggested follow up discovery based on Fifth Third's response	.1
6/2/21	JW	review email from Fifth Third counsel requesting call	.1
6/2/21	JW	prepare update letter to class reps regarding class certification	1.2
6/2/21	JW	continue preparation of letter to class reps	.3
6/2/21	JW	review email from Fifth Third counsel regarding availability for conference call	.1
6/3/21	JW	prepare for conference call with Fifth Third counsel regarding case management order	.6
6/3/21	JW	conference call with co-counsel in advance of call with Fifth Third counsel	.5

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Date	Attorney	Description	Time
6/3/21	JW	conference call with Fifth Third counsel regarding notice plan and discovery order	1.1
6/3/21	JW	continue review of documents to respond to Fifth Third's request for continued discussion on case management order	.5
6/3/21	JW	review additional topics for 5/3 30b6 deposition	.1
6/3/21	JW	review email to Epiq regarding notice changes	.1
6/7/21	JW	reviewed revised notice plan and email to fifth third counsel regarding revised notice plan	,2
6/9/21	JW	review email from defense counsel regarding attaching proposed edits to notice plan	.1
6/9/21	JW	review edited notice plan	.2
6/9/21	JW	emailed with co counsel regarding discovery plan and fifth third draft notice plan	.4
6/10/21	JW	review emails with Epiq regarding Fifth Third's proposed edits.	.2
6/10/21	JW	review emails between defense counsel and plaintiff's counsel regarding proposed edits to notice plan re: publication	.5
6/10/21	JW	review final declaration from Epiq re: class notice	.2
6/11/21	JW	review defense counsel email attaching revised CMS	.1
6/11/21	JW	review proposed final revisions provided by Fifth Third to CMS	.2
6/11/21	JW	correspond with co counsel regarding proposed final revisions	.3
6/11/21	JW	review email from defense counsel regarding refusal as to term "payday"	.1
6/14/21	JW	review email from defense counsel attaching proposed edits to Cert Notice and Epiq declaration	.1
6/14/21	JW	review defense edits to cert notice	.1
6/14/21	JW	review defense edits to Epiq declaration	.1
6/15/21	JW	review our final edits to notice and epiq declaration based on defenses edits	.2

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Date	Attorney	Description	Time
6/15/21	JW	finalize letter and cover email addresses to clients	.3
6/16/21	JW	review operative complaint to review response to defense counsel regarding requesting for certain language to be removed from notice	.2
6/16/21	JW	review email from defense counsel requesting removal of reference to allegations in the complaint	.1
6/21/21	JW	review final notice documents with all edits made by parties	.3
6/21/21	JW	review final CMS	.2
6/21/21	JW	review emails from Cam Azari regarding making edits to final notice drafts	.2
6/22/21	JW	review final edits to CMS from Fifth Third	.2
6/27/21	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussed final notice plan. Discussed lettrs being sent to class reps. Discussed discovery plan moving forward. Discuss CMS and proposed edits by Fifth Third.	.8
6/30/21	JW	review fifth third's final edits to notice plan and declaration for notice plan.	.3
6/30/21	JW	review proposed order granting motion to provide notice to class and approving notice plan	.1
7/8/21	JW	review email from Epiq attaching example data points dictionary and how to send data documents	.1
7/8/21	JW	reviewed Epiq's how to send data to epiq document	.1
7/8/21	JW	reviewed epiq's example data dictionary.	.1
7/14/21	JW	review order granting plaintiff's motion to approve notice plan	.1
7/14/21	JW	review order setting case management deadlines	.1
7/22/21	JW	review correspondence between Plaintiffs counsel and Fifth Third and Epiq regarding data required to send out notice in accordance with Court's order	.3
7/22/21	JW	review defendants supplemental responses to plaintiffs 3 <sup>rd</sup> rfps and 4 <sup>th</sup> roggs	.2
8/3/21	JW	prepare for discovery meeting with co-counsel	.8

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Date	Attorney	Description	Time
8/3/21	JW	call with co-counsel regarding discovery and summary judgment	1.0
8/3/21	JW	review records to prepare draft discovery	.8
8/4/21	JW	begin reviewing case discovery to prepare supplemental discovery	.8
8/12/21	JW	revise and update Good faith letter regarding discovery to Fifth Third	1.2
8/12/21	JW	review emails between defense counsel, and class administrator regarding conference call	.3
8/13/21	JW	review Fifth Third counsel's email regarding follow up questions from Epiq notice data	.1
8/13/21	JW	review fifth Third's discovery requests to date to determine whether to request to supplement.	2.6
8/13/21	JW	conference call regarding motion for summary judgment and discovery	1.1
8/13/21	JW	review fifth thirds second set of Interrogatories	.1
8/13/21	JW	review email from epiq confirming follow up questions regarding class notice	.1
8/13/21	JW	review Fifth Third second set of Request for Production	.1
8/16/21	JW	finalize discovery	2.3
8/16/21	JW	review and finalize good faith letter to Fifth Third	.2
8/17/21	JW	review telephone script notice for class members prepared by Epiq	.2
8/19/21	JW	reviewed email from Karl Fanter regarding good faith letter and request to respond in September	.1
8/19/21	JW	prepare email to Epiq confirming acceptance of IVR script	.1
8/19/21	JW	review email from Epiq acknowledging acceptance of IVR script	.1

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<u>Date</u>	Attorney	Description	Time
8/19/21	JW	review updated email verisions of notice from epiq	.3
8/24/21	JW	review email from Fifth Third counsel regarding response to good faith letter	.1
8/24/21	JW	review final notice versions and draft website from Epiq and email from Brian Pinkerton	.5
8/25/21	JW	review and edit 30b6 notice in Fifth Third	.3
8/25/21	JW	review email notice from Epiq	.1
8/25/21	JW	review email from Epiq responding to Plaintiff's question regarding email notice	.1
8/25/21	JW	review email from defense counsel to epiq approving notice website with caveat of activating link	.1
8/25/21	JW	review email from Eqip regarding suppressing undeliverable emails and attachment with emails	.2
9/2/21	JW	review documents produced by Fifth Third	.1
9/2/21	JW	review Fifth Third letter regarding our good faith letter	.1
9/3/21	JW	prepare for telephone conference regarding discovery requests	.8
9/3/21	JW	Telephone conference re discovery requests	.4
9/3/21	JW	review final version of 30b6	.1
9/3/21	JW	review previous discovery responses of plaintiffs to responds to new discovery	.4
9/3/21	JW	prepare emails to plaintiffs regarding new discovery requests	.3
9/3/21	JW	review email to Fifth Third good faith	.1
9/8/21	JW	call with fifth thread counsel re discovery	.6

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Date	Attorney	Description	Time
9/8/21	JW	follow up call with co counsel to discuss outstanding discovery issues	.3
9/8/21	JW	conference call regarding Fyock updated discovery	.1
9/8/21	JW	conference call with Harrison regarding case status and updated discovery	.2
9/10/21	JW	review email from Defense counsel regarding needing to reschedule meet and confer	.1
9/10/21	JW	review new statements from Laskaris	.2
9/13/21	JW	review email from defense counsel regarding rescheduling meet and confer	.1
9/13/21	JW	review documents, prior discovery and draft discovery responses to finalize discovery	1.2
9/14/21	JW	zoom conference with Laskaris	.4
9/14/21	JW	review documents sent by Laskaris	.1
9/14/21	JW	review letter from Fifth Third counsel regarding supplemental discovery letter regarding amendment to 2015 terms and condition	.1
9/14/21	JW	review supplement discovery document provided by Fifth Third	.1
9/14/21	JW	review summary of good faith call with Fifth Third counsel	.1
9/15/21	JW	prepare email to	.1
9/15/21	JW	prepare emails to Fyock	.1
9/20/21	JW	review discover to prepare and revise ESI Search Term list and revise term list	.7
9/20/21	JW	prepare email to Horn	.1

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<u>Date</u>	Attorney	<u>Description</u>	Time
9/20/21	JW	review draft dismissal of Horn and Klopfenstein	.1
9/20/21	JW	review email from defense counsel regarding requested verification pages	.1
9/22/21	JW	review email from Fifth Third Counsel regarding objection to data beyond 2013, but agreement to provide data	.1
9/23/21	JW	review Fifth Third's responses to 4 <sup>th</sup> RFPs, 5 <sup>th</sup> roggs, amended responses to 3 <sup>rd</sup> RFPS and response to request for 30b6.	.4
9/23/21	JW	Reviewed final of voluntary dismissal of Klopfenstein and Horn	.1
9/24/21	JW	review updated notice receipt results form Epiq	.1
9/25/21	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussion regarding discovery and deadlines moving forward.  Discussed dismissal of Horn and Klopfenstein claims.	.4
9/29/21	JW	review email from defense counsel re 30b6	.1
9/30/21	JW	review email from defense counsel to Judge Barrett attaching motion for class action trial plan	.1
9/30/21	JW	review defendant's motion for class action trial plan	.2
9/30/21	JW	review proposed order on defendant' motion for class action trial plan	.1
10/1/21	JW	prepare exhibit A to subpoena to Oliver Wyman	1.2
10/1/21	JW	review email from Epiq attaching notice status report	.1
10/1/21	JW	review notice status report	.1
10/6/21	JW	review emails from counsel regarding meet and confer on 30b6	.2
10/8/21	JW	finalize and serve subpoena to Oliver Wyman	.4

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Date	Attorney	Description	Time
10/8/21	JW	teleconference with fifth third counsel regarding 30 b6 meet and confer	.5
10/8/21	JW	begin researching	.8
10/12/21	JW	continued research	1.5
10/12/21	JW	prepare bankruptcy section for response to motion to bifurcate trial plan	3.4
10/13/21	JW	review and edit final good faith letter to opposing counsel	.2
10/13/21	JW	review emails from defense counsel confirming new 30b6 date	.2
10/14/21	JW	review edit second draft of plaintiff's response to defendant's motion to bifurcate trial plan	.1
10/14/21	JW	review email from Epiq re: draft declaration and opt out request	,1
10/14/21	JW	review proposed draft declaration	.1
10/14/21	JW	review opt outs attached to email by epiq	.3
10/15/21	JW	review additional edits to response to defendant's motion for bifurcated trial plan.	.1
10/18/21	JW	review email from defense counsel regarding confirming status of 30b6 meet and confer	.1
10/21/21	JW	review information on proposed experts re: APR term	.3
10/21/21	JW	review final edits to response in opposition to defendant's motion for bifurcated trial plan	.2
10/25/21	JW	review email from Fifth Third attaching correspondence related to 8th production	.1

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Date	Attorney	Description	Time
10/25/21	JW	review letter from Fifth Third with password to access 8th production of documents	.1
10/25/21	JW	review email from defense counsel attaching discovery letter	.1
10/25/21	JW	review discovery good faith letter	.2
10/25/21	JW	review letter from Fifth Third regarding document production	.1
10/26/21	JW	review email from Brian Pinkerton regarding class cert notice	.1
10/29/21	JW	review email from Oliver Wyman counsel regarding availability for meet and confer	.1
10/29/21	JW	prepare email to Oliver Wyman counsel regarding meet and confer	J
10/29/21	JW	review records, discovery correspondence etc., regarding discovery disputes with Fifth Third	.8
10/29/21	JW	review case law regarding	.3
11/1/21	JW	review final revisions to Fifth Third 30b6 notice	.2
11/1/21	JW	review records to prepare for good faith conference with Fifht Third	.6
11/1/21	JW	prepare ESI list for	.3
11/1/21	JW	conference call with Fifth Third counsel regarding discovery disputes	.8
11/1/21	JW	review and finalize edits to 30b6 notice	.1
11/2/21	JW	review and edit follow up email to defense counsel summarizing meet and confer	-1
11/2/21	JW	review letter regarding 9th production from defendant	.1
11/2/21	JW	review email from defense counsel regarding summary of meet and confer	.1

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Date	Attomey	Description	Time
11/3/21	JW	review prior discovery to prepare for 30b6 deposition	.8
11/3/21	JW	prepare for call with Oliver Wyman counsel	.4
11/3/21	JW	conference call with Oliver Wyman counsel	.3
11/3/21	JW	prepare email to Oliver Wyman counsel summarizing agreed extension related to subpoena.	.2
11/4/21	JW	review email from defense counsel regarding native file issue with produced discovery	.1
11/5/21	JW	review fifth Third reply in support of motion or bifurcated trial plan	.2
11/5/21	JW	review discovery in advance of deposition	.8
11/5/21	JW	virtually attend fifth Third deposition	4.5
11/6/21	JW	review and edit proposed letter to opposing counsel regarding settlement negotiations in light of deposition	.1
11/8/21	JW	review email from defense counsel regarding meet and confer on 30b6	.1
11/9/21	JW	review email from Fifth Third counsel with counter-proposal to ESI terms	.1
11/9/21	JW	review attachments to ESI proposal email	.3
11/12/21	JW	review email form Lakaris	.1
11/12/21	JW	review email regarding Fifth Third's response to documents not viewable produced through discovery.	.1
11/16/21	JW	review letter re 11 production from Fifth Third	.1
11/16/21	JW	review email from Fifth Third counsel re 11th production	.1

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<u>Date</u>	Attorney	<u>Description</u>	<u>Time</u>
11/16/21	JW	review final counterproposals to Fifth Third suggested revisions to ESI search terms	.1
11/17/21	JW	review email from defense counsel regarding plaintiff's deficient discovery responses	.1
11/17/21	JW	review letter from defense counsel regarding deficient discovery responses from plaintiffs	.1
11/18/21	JW	review transcript of Fifth Third corporate rep	.8
11/24/21	JW	review email from Fifth Third counsel regarding status of agreement to produce documents	.1
11/29/21	JW	review correspondence from Oliver Wyman Counsel regarding production in response to subpoena	.2
11/29/21	JW	review documents produced by Oliver Wyman	1.1
11/29/21	JW	review fifth third's counterproposal to our counterproposal on ESI search terms	.1
11/29/21	JW	review email regarding discovery negotiations from Fifth Third counsel	.1
11/29/21	JW	review letter from defense counsel regarding 12th production of documents	.1
11/30/21	AW	review and edit response to fifth third 11.17 good faith letter	.2
11/30/21	JW	review prior discovery response to prepare letter in response to Fifth Third 11.17 good faith letter	1.2
11/30/21	JW	prepare response to Fifth Third 11.17 good faith letter	.8
12/1/21	JW	review email from defense counsel attaching letter and proposed second amended answer	.1

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Date	Attorney	Description	Time
12/1/21	JW	review letter requesting consent for Fifth Third to file second amended answer	.1
12/1/21	JW	Review Fifth Third redlined proposed second amended answer.	.2
12/2/21	JW	review documents produced by Plaintiff Fyock	.5
12/2/21	1M	prepare email to counsel for Oliver Wyman following up on production	.1
12/3/21	JW	prepare Fiserv subpoena and exhibit	1.3
12/3/21	JW	review letter from Fifth Third counsel regarding 13th production of documents	.1
12/6/21	JW	review email from Oliver Wyman counsel regarding search for missing word document.	Л
12/8/21	JW	review transcripts to prepare amended responses to discovery	2.6
12/8/21	JW	begin prepare revised answers to interrogatories.	.8
12/8/21	JW	review email from defense counsel regarding response to November 21 good faith letter	.1
12/8/21	JW	review letter from Fifth Third regarding 14th production of documents	.1
12/8/21	JW	prepare email in response to email regarding good faith letter attaching formal response letter	.1
12/8/21	JW	review email from Oliver Wyman counsel confirming no additional documents	.1
12/8/21	JW	prepare email in response to Oliver Wyman counsel document confirming no additional documents	.1
12/8/21	JW	review email from Fifth Third regarding status of Plaintiffs position on leave to amend answer	.1

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Date	Attorney	Description	Time
12/8/21	JW	review email from Fifth Third regarding status of updated discovery responses from Defendant	,1
12/10/21	JW	review amended responses to interrogatories served by Fifth Third	.2
12/10/21	JW	review email from Fiserv regarding status of subpoena.	.1
12/13/21	JW	begin working on demand letter	.6
12/13/21	JW	review letter from defense counsel re 15 production by fifth third	.1
12/13/21	JW	review emails from plaintiffs regarding review of amended rogg answers.	.3
12/14/21	JW	review email from Fifth Third counsel regarding meet and confer	.1
12/14/21	JW	conference with co-counsel regarding discovery	.5
12/15/21	JW	review defendants' motion to amend answer and affirmative defense and exhibits	.4
12/15/21	JW	prepare Carreker subpoena	.4
12/15/21	JW	review email to Judge Barrett from Fifth Third regarding proposed order to amend affirmative defense	1
12/15/21	JW	review proposed order granting leave to amend answer and affirmative defenses.	.1
12/15/21	JW	review email from Plaintiff Fyock regarding	.1
12/15/21	JW	review email from Brian Pinkerton with draft declaration from Epiq	,1
12/15/21	JW	review outstanding discovery issues in preparation for meet and confer call	3
12/15/21	JW	reviewed letter regarding 16th production by Fifth Third	

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Date	Attorney	Description	Time
12/16/21	JW	review email from fifth third counsel regarding final production expectation	L
12/17/21	JW	review email from defense counsel regarding initial disclosures	.1
12/17/21	JW	review initial disclosures	.1
12/17/21	JW	review email from Fifth Third counsel regarding discovery letter and privilege log	.1
12/17/21	JW	review discovery letter from Fifth Third	.1
12/17/21	JW	give initial review of privilege log	.8
12/18/21	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussed motion to amend and affirmative defense proposed by Fifth Third.  Advised of updated costs and projected costs moving forward.	.6
12/22/21	JW	review email from Fiserve counsel regarding subpoena	.1
12/22/21	JW	all regarding disco and document search	1.2
12/23/21	JW	review document production log	.2
12/23/21	JW	prepare email to Fiserve counsel regarding subpoena	.1
12/27/21	JW	review email from Fiserve regarding scheduling phone conference	.1
12/27/21	JW	began review of discovery produced by 5/3	1.2
1/5/22	JW	continued review of discovery produced by 5/3	2.1
1/5/22	JW	review email from Fiserve counsel regarding phone conference availability	.1
1/5/22	JW	review email from Fifth Third counsel regarding previously submitted privilege log	.1

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Date	Attorney	Description	Time
1/6/22	JW	call with Fifth Third regarding discovery	.2
1/6/22	JW	began review of revised summary judgment motion	.5
1/6/22	JW	continued review of discovery produced by 5/3	2.6
1/7/22	JW	conference call regarding discovery and motion for summary judgment	1.0
1/7/22	JW	review stipulation to authenticity	.1
1/7/22	JW	conference regarding summary judgment and discovery	.8
1/7/22	JW	continued review of discovery produced by 5/3	.5
1/10/22	JW	continued preparing demand to Fifth Third	1.5
1/10/22	JW	phone conference with Fiserve counsel regarding subpoena	.2
1/10/22	JW	prepare summary of phone conference with Fiserve counsel	.1
1/10/22	JW	telephone conference with Fiserve counsel re subpoena	.2
1/10/22	JW	continued review of Fifth Third production	.6
1/11/22	JW	continued review of fifth third production	1.2
1/12/22	JW	review and provide suggested edits of expert report	.7
1/12/22	JW	review message from opposing counsel regarding Fifth Third 20-21 production	.1
1/13/22	JW	continued review of fifth third production	2.3
1/14/22	JW	call to review and discuss expert	1.1
1/16/22	JW	continued review of fifth third production	2.0

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Date	Attorney	Description	Time
1/19/22	JW	continue review of Fifth Third production	1.2
1/19/22	JW	review fifth third counsel email regarding consent motion to extend time	.1
1/19/22	JW	review fifth third suggested edits to expert disclosure deadline extension.	.1
1/19/22	JW	review final consent motion to extend expert disclosure deadlines	.2
1/20/22	JW	re-review initial disclosures to look up Bruce Howard employment status	.1
1/20/22	JW	continued review of Fifth Third production	1.4
1/20/22	JW	review revisions to experts report	-3
1/20/22	JW	review emails from fifth third counsel regarding how handle judge not ruling on consent motion to extend discovery deadline	.2
1/21/22	JW	review and discuss expert	2.1
1/22/22	JW	review records looking for document that states fifth third's average repayment term	1.6
1/23/22	JW	finish fifth third production review of folder 15	2.1
1/26/22	JW	review emails regarding data glitch on discovery responses from fifth third	.2
1/29/22	JW	review hot does from supplemental production	.2
1/30/22	JW	review document in fifth third production re apr calculation exceeding 120	-,1
1/31/22	JW	review document with fifth third admission that it charged at least 120 apr	.1
2/3/22	JW	conference call with Fiserv/Carrekar counsel re subpoenas	.2

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Date	Attorney	<u>Description</u>	Time
2/3/22	JW	review email from Fiserv/Carrekar counsel confirming not responsive records/information	.1
2/3/22	JW	prepare email confirming release of Fiserv/Carrekar from any further obligation pursuant to the subpoena	.1
2/11/22	JW	review final draft of summary judgment	.8
2/11/22	JW	review minor edits from Aaron McReynolds to summary judgment motion	.4
2/12/22	JW	review email from Mike Simkovic regarding scheduling meeting	.1
2/16/22	JW	review notice of telephone status conference	.1
2/16/22	JW	review emails with court and counsel regarding status conference	.4
2/16/22	JW	review email from opposing counsel regarding status of discovery in advance of case management conference.	.1
2/18/22	JW	review edits to expert Simovic's report	.3
2/18/22	JW	review email from Carrekar counsel confirming no responsive documents to the subpoena.	.1
2/18/22	JW	prepare email to Carrekar counsel confirming no responsive documents to subpoena	.1
2/18/22	JW	review discovery issues and motion, discuss with co-counsel in preparation for case management conference.	1.0
2/18/22	JW	call with expert Simkovic	1.1
2/19/22	JW	hours reviewing hot docs for additional depositions and to add as exhibits to summary judgment	1.7
2/21/22	JW	review email from Fifth Third counsel regarding issues to discuss in advance of case management conference	.1

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Date	Attorney	Description	Time
2/21/22	JW	prepare for call with opposing counsel in advance of status conference	.5
2/21/22	JW	telephone conference with opposing counsel regarding status conference	.3
2/21/22	JW	review email from Fifth Third counsel regarding issues to discuss in advance of case management conference	.1
2/22/22	JW	status conference with Judge Barrett	,5
2/22/22	JW	review and conference regarding status conference and motion for summary judgment	1,1
2/22/22	JW	draft paragraph in facts section of summary judgment motion adding hot docs	.6
2/22/22	JW	review order granting fifth third motion to amend answer and affirmative defense	.1
2/22/22	JW	attend status conference	.2
2/22/22	JW	review minute entry on status conference	.1
2/23/22	JW	finalize draft of demand	1.6
2/23/22	JW	review order on leave to file amended answer by 3/1	.1
2/23/22	JW	review notice to reset deadlines from Court	.1
2/23/22	JW	review Fifth Third's amended answer	.2
2/24/22	JW	complete review of Fifth Third production	3.2
2/28/22	JW	conference call with Fifth Third counsel regarding depositions	.2
2/28/22	JW	conference call with co-counsel to decide on Fifth Third proposal regarding depositions	.5
2/28/22	JW	review amended affirmative defenses to decide if any additional discovery needed	.1

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Date	Attorney	Description	Time
3/L/22	JW	follow up call with Fifth third counsel regarding depositions	.2
3/1/22	JW	research truth in lending good faith defense	.4
3/2/22	JW	review email and proposed motion to amend discovery schedule with exhibit from Fifth Third	.2
3/2/22	JW	review notice of withdrawal from attorney Penny Handy	.1
3/3/22	JW	review email from fifth third counsel regarding trial dates	.1
3/4/22	JW	review email from defense counsel re confirming not agreement on trial date	.1
3/4/22	JW	review consent motion to extend discovery deadlines	.1
3/7/22	JW	review defendants' response to Judge Barret's clerk's email requesting trial date	.1
3/9/22	JW	review email from judge Barrett chambers regarding April trial date	.1
3/9/22	JW	review email from defense counsel re April trial date	.1
3/9/22	JW	review email from defense counsel requesting confirmation on plaintiff's damages cutoff	.1
3/9/22	JW	review Fifth Third amended response to rog 11	
3/9/22	JW	review email from defense counsel regarding update on data overlay	.1
3/10/22	JW	review email confirming subpoena service on Bruce Howard	
3/10/22	JW	review summary of documents issues from Disco	
3/11/22	JW	research research	.4
3/13/22	JW	reviewed summary of privilege log issues	
3/15/22	JW	notice of withdrawal of counsel by attorney Johnson	

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Date	Attorney	Description	Time
3/15/22	JW	review order denying joint motion to set supplemental calendar as moot	.1
3/15/22	JW	review order granting motion for extension of time	.1
3/17/22	JW	review	.1
3/17/22	JW	review and edit draft email to defense counsel regarding data stipulation	.1
3/24/22	JW	review final summary judgment draft	.8
3/28/22	JW	review email from defense counsel regarding depositions being held via zoom vs. in person	:1
3/29/22	JW	review expert reports and edit demand to include expert reports	2.2
3/30/22	JW	review final draft and outstanding issues related to summary judgment motion	.8
4/1/22	JW	reviews revised letter regarding privilege log	.2
4/2/22	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussion of summary judgement motion. Review of expert reports.  Status of trial date and outstanding discovery and remaining depositions.	.5
4/4/22	JW	reviewed emails from defense counsel regarding scheduling deposition	.2
4/8/22	JW	review emails from defense attorneys and Bruce Howard attorneys regarding availability for deposition	.2
4/11/22	JW	review notices of deposition for Mark Earhardt, Thomas Carpenter and Thomas Kappes	3
4/11/22	JW	review Dia Rasinau motion to appear pro hac	.1
4/12/22	JW	review order granting motion to appear pro hac from Día	.1
4/18/22	JW	1 review consent motion for extension of time to file answer	.1

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Date	Attorney	<u>Description</u>	Time
4/20/22	JW	review email from Fifth Third counsel regarding time for conference call	.1
4/20/22	JW	review emails from Bruce Howard counsel and fifth third counsel regarding deposition dates	.2
4/20/22	JW	review email from defense counsel regarding motion to sealreview email from defense counsel regarding motion to seal	.1
4/20/22	JW	review answer	.2
4/20/22	JW	review order deeming answer timely	.1
4/21/22	JW	review letter form defense counsel regarding 25th production of documents	.1
4/22/22	JW	review summary of Tom Kappes deposition	.1
4/22/22	JW	virtually attend deposition of Kappas	3.8
4/22/22	JW	review multiple emails from defense counsel regarding filing discovery under seal for motion for summary judgment	.2
4/25/22	JW	review clerk's notice of noncompliance with pdf filing	.1
4/25/22	JW	begin preparing for Tom Carpenter deposition	3.6
4/26/22	JW	1 review email from opposing counsel regarding remote deposition of Carpenter	.1
4/26/22	JW	prepare email responding to opposing counsel email regarding carpenter deposition	.1
4/26/22	JW	review notice of change of address for defense counsel	.1
4/26/22	JW	prepare amended notice of deposition of Tom Carpenter	.2
4/27/22	JW	review amended notice of taking Bruce Howard Deposition	.1

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Date	Attorney	Description	Time
4/27/22	JW	finalize outline and exhibits for tom Carpenter deposition	2.3
4/28/22	JW	review letter from fifth third regarding claw back and replacement document based on privlege	.2
4/28/22	JW	attend depositions of Tom Carpenter and Mark Erhardt	7.2
4/28/22	JW	review updated draft of demand	.3
4/29/22	JW	call to discuss demand and depositions	1.2
5/3/22	JW	review letter and updated privilege log from Fifth Third	.3
5/3/22	JW	review Fifth Third cross notice of Howard deposition	.1
5/9/22	JW	review steven Pryser motion to appear pro hac vice	.1
5/9/22	JW	review email from defense counsel requesting status conference	.1
5/12/22	JW	review email from Judges clerk re status conference	.1
5/12/22	JW	review email from defense counsel regarding availability for status conference	.1
5/12/22	JW	review notice of status conference	.1
5/13/22	JW	review work-product privilege between former unrepresented employee and corporate	.3
5/13/22	JW	review email from Howard counsel regarding depo availability	.1
5/13/22	JW	attend Bruce Howard deposition	6.0
5/13/22	JW	debrief call on Bruce Howard deposition	.3
5/16/22	JW	review edits and revisions to Simkovic report	

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Date	Attorney	<u>Description</u>	Time
5/17/22	JW	review minute entry from court regarding case management	.1
5/17/22	JW	Review Simkovic report and consult on edits	1.2
5/18/22	JW	review multiple emails from expert Simkovic re conference call	.3
5/18/22	JW	Review Simkovic and Pat Oliver reports and discuss same via email	.5
5/18/22	JW	Review Howard transcript	.7
5/19/22	JW	review email from Barrett's clerk regarding follow up status conference	.1
5/19/22	JW	review emails from defense counsel agreeing to extension of expert report deadline	.2
5/19/22	JW	review email from defense counsel regarding availability for status conference	.1
5/19/22	JW	Review email from Barrett clerk	.1
5/19/22	JW	Review carpenter transcript	.8
5/20/22	JW	Review simkovic edits	.4
5/20/22	JW	Review follow up email from Barretts Clerk	.1
5/20/22	JW	Review email from defense counsel regarding status conference	.1
5/20/22	JW	Review notice of hearing	.1
5/20/22	JW	Attend case management conference	.2
5/20/22	JW	Review minutes entry from case management	.1
5/20/22	JW	Review order granting motion to seal	.1

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Date	Attorney	Description	Time
5/24/22	JW	Review various emails from Simkovic and report edits	.6
5/25/22	JW	review expert reports from defendant and attachments	1.4
5/25/22	JW	Review multiple emails from Simkovic	.2
5/25/22	JW	Review finalized expert reports	.7
5/25/22	JW	Review expert reports and exhibits of Defendants experts	1.2
5/26/22	JW	review proposed joint motion to extend sj briefing deadlines	.1
5/27/22	JW	conference call regarding rebuttal experts	.5
5/27/22	JW	review emails from Simkovic regarding updating reports and bills	.3
5/27/22	JW	review email to Judge Barret with proposed order re sj briefing deadline	.1
5/27/22	JW	review proposed order on summary judgment briefing deadlines	.1
5/27/22	JW	Review joint motion to amend motion for extension of time	.1
5/31/22	JW	reviewed order granting joint motion for briefing schedule	,1
6/1/22	JW	Review multiple correspondence from Simkovic	.4
6/2/22	JW	call with Simkovic and counsel regarding rebuttal report	1.3
6/2/22	JW	review and prepare supplemental report issues for Simkovic	.3
6/2/22	JW	Conference call with Simkovic regarding rebuttal	.5
6/2/22	JW	Review Fifth Third competitors APR terms	.1
6/2/22	JW	Review correspondence with Simkovic	_2

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Date	Attorney	Description	Time
6/2/22	JW	Review email from defense counsel regarding depo dates	.1
6/8/22	JW	Review multiple correspondence from Simkovic	.6
6/9/22	JW	Review CVs for potential marking rebuttal expert	.4
6/12/22	JW	Review Simkovic rebuttal draft	.3
6/12/22	JW	Review multiple correspondence from Simkovic	.3
6/13/22	JW	read draft rebuttal report by Michael Simkovic	.4
6/13/22	JW	Review emails from Simkovic regarding revisions to rebuttal report	.2
6/16/22	JW	Review edits to Simkovic rebuttal report	.3
6/16/22	JW	Review email from Simkovic regarding continued edits to rebuttal report	.1
6/17/22	JW	Review emails from Simkovic regarding refining report	.2
6/17/22	JW	Call to discuss expert reports	.5
6/17/22	JW	Review edits to Simkovic report	.2
6/18/22	JW	Review email from Simkovic and his edits to report	.2
6/19/22	JW	Review email from Simkovic regarding waiting to review further	.1
6/19/22	JW	Revise Simkovic report	.3
6/20/22	JW	Review emails from Simkovic regarding receiving revisions to report	.3
6/21/22	JW	Review Simkovic edits to his report	.3
6/21/22	JW	Review Simkovic invoice	.1

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Date	Attorney	Description	Time
6/22/22	JW	finalize Simkovic report	.7
6/22/22	JW	telephone conference with Simkovic	.2
6/23/22	JW	Zoom conference with Simkovic	.3
6/23/22	JW	Finalize Simkovic report	1.2
6/24/22	JW	Review email from defense counsel attaching rebuttal reports	.1
6/24/22	JW	Review rebuttal report of Grice	.3
6/25/22	JW	Quarterly review of firm cases. Status update on Fifth Third. Discussion of case management conference. Update on most recent depositions, Howard, Erhardt and Carpenter. Discussion of demand.  Discussion of rebuttal	1.5
6/29/22	JW	Review motion for leave to appear pro hac by Pellegrino	ı.i
6/30/22	JW	Review order granting pro hac motion from Pellegrino	- 41
7/5/22	JW	Call regarding expert assignments for deposition	1.0
7/5/22	JW	Review email from defense counsel regarding expert depo scheduling	,1
7/6/22	JW	Review multiple emails from defense counsel regarding expert depo scheduling	3
7/7/22	JW	Review multiple emails from defense counsel regarding expert depo scheduling	
7/8/22	JW	Review multiple emails from defense counsel regarding expert depo scheduling	
7/11/22	JW	Review email from defense counsel regarding depos schedule	- 3

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Date	Attorney	Description	Time
7/13/22	JW	Review multiple emails from defense counsel regarding depo schedules of experts	.3
7/14/22	JW	Review Plaintiff's notice of depositions of Grice, Wilcox, and Green	.3
7/15/22	JW	Review invoices and emails regarding expert retainers	.4
7/25/22	JW	Review notice of substitution of counsel for William Hopkins	.1
7/27/22	JW	Begin preparation Simkovic	.8
7/27/22	JW	Review notice to	.1
7/28/22	JW	Prepare for Simkovic	2.1
7/28/22	JW	Review emails from Simkovic regarding depositions	.4
7/29/22	JW	Continue preparing for Simkovic	1.4
7/29/22	JW	Attend Grice deposition	2.8
7/29/22	JW	Simkovic	2.7
8/8/22	JW	Review Grice rough transcript	.5
8/9/22	JW	Review email from Simkovic	.2
8/9/22	JW	Attend final prep session of Simkovic	2.5
8/11/22	JW	Virtually attend Simkovic's deposition	7.0
8/25/22	JW	review and analyze issues regarding fifth third's motion for summary judgment	.4
9/7/22	JW	prepare notice and bankruptcy sections of response to Fifth Third summary judgment	3.1

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Date	Attorney	<u>Description</u>	Time
9/22/22	JW	continued preparing response to fifth third motion for summary judgment	.8
9/30/22	JW	review and edit response to Fifth Third Summary Judgment	1.3
10/1/22	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussed Fifth Third Summary judgment on TILA and r	1.2
10/7/22	JW	review and discuss reply brief for SJ	1.2
10/18/22	JW	research case law for reply in support of motion for summary judgment	4.2
10/19/22	JW	reseachred case law for reply in support of motion for summary judgment TILA	2.3
10/19/22	JW	began preparing reply in support of motion for summary judgment TILA	3.6
10/20/22	JW	review edits to reply in support of summary judgment	.8
10/20/22	JW	review and edit reply brief	.5
10/21/22	JW	continued edits of reply in support of summary judgment	.9
10/21/22	JW	conference re reply to summary judgment	1.2
11/1/22	JW	review and edit reply brief	.5
11/2/22	JW	review final edits to Reply brief	.3
11/2/22	JW	review email from opposing counsel regarding interrogatories marked confidential.	.1
12/15/22	JW	revise demand	1.2

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Date	Attorney	Description	Time
12/17/22	JW	Quarterly review of firm cases. Status update on Fifth Third.  Discussion regarding reply brief. Discussion regarding amended demand to be prepared. Discussion of settlement potential and status of case moving forward. Advised of updated costs and projected costs moving forward	1,1
12/22/22	JW	Meeting to discuss	1.2
12/26/22	JW	review	.3
1/5/23	JW	review email from defense counsel regarding settlement demand response	.1
1/5/22	JW	review letter from defense counsel regarding settlement demand response	.1
1/5/23	JW	review cost proposals for trial tech teams for mock trial, focus group and trial	.2
1/6/23	JW	review quarter 3 financials for Fifth Third	.9
1/6/23	JW	discuss	1.2
1/9/23	JW	review witnesses for witness list	.4
1/9/23	JW	review witness list	.1
1/13/23	JW	review proposed schedule and email to Judge's clerk regarding pretrial deadlines	A
1/13/23	JW	review proposed scheduling order	.2
1/13/23	JW	review final draft of settlement demand response	1
1/13/23	JW	call regarding scheduling	1.0
1/17/23	JW	review email from Judge Barrett's clerk regarding status conference availability	

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Date	Attorney	Description	Time
1/18/23	JW	review notice of case management conference	.1
1/19/23	JW	conference call in advance of CMC	.4
1/19/23	JW	attend CMC	.3
1/19/23	JW	start review of Simkovic deposition and highlighting	1.9
1/19/23	JW	review minute entry from CMC	.1
1/21/23	JW	review	.4
1/24/23	JW	review	1.4
1/25/23	JW	continue review of simkovic transcript for trial	1.6
1/27/23	JW	review jury instructions	.3
1/30/23	JW	review revised jury instructions	.2
2/1/23	JW	continue review of Simkovic deposition	1.2
2/4/23	JW	continue review of depositions	2.3
2/6/23	JW	review order by judge Barrett on similar motion to dismiss against fifth third	.4
2/6/23	JW	continue review of depositions	2.3
2/7/23	JW	continue review of depositions to prepare for trial	2.4
2/8/23	JW	continue reviewing depositions for	1.2
2/10/23	JW	continue reviewing depositions	.9

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Date	Attorney	Description	Time
2/13/23	JW	review email from defense counsel regarding draft scheduling order	.1
2/18/23	JW	Meeting re: trial prep.	1.1
2/18/23	JW	review proposed topics of motions in limine for trial	.5
2/19/23	JW	review additional motion in limine topics	.2
2/21/23	JW	review motion in limine to exclude grice and green	.3
2/22/23	JW	review email from defense counsel regarding stipulated date to respond to motions in limine re: Daubert	.1
2/22/23	JW	review email from defense counsel attaching MILs to exclude plaintiffs experts	.1
2/22/23	JW	review motion to exclude oliver and Simkovic	.3
3/2/23	JW	review pretrial order submission	.1
3/2/23	JW	continue preparing exhibit list and reviewing exhibits	4.2
3/2/23	JW	review and edit response to Walker MIL	.5
3/3/23	JW	Travel and meet in D.C. for	19.0
3/4/23	JW	review motion in limine regarding class actions	.1
3/5/23	JW	continue preparation of exhibit list and review of exhibits	2.6
3/6/23	JW	finalize exhibit list and review of exhibits	4.8
3/6/23	JW	telephone conference regarding	.2
3/6/23	JW	review response to MIL to exclude Oliver and Simkovic	.3

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Date	Attorney	Description	Time
3/8/23	JW	review email from defense counsel regarding trial issues	.1
3/8/23	JW	continue review of exhibits and list	-8
3/8/23	JW	prepare email to defense counsel regarding trial issues	.1
3/9/23	JW	finalize draft exhibits and review exhibits	3.2
3/9/23	JW	review proposed jury instructions and jury verdict form	.3
3/10/23	JW	review trial order of presentation	.1
3/10/23	JW	review initial exhibit list of fifth third	.1
3/10/23	JW	finalize exhibt list	1.3
3/10/23	JW	prepare email to defense counsel attaching exhibits and exhibit list	.1
3/10/23	JW	prepare email to Steve Pyser regarding trial	.1
3/12/23	JW	prepare designations for tom carpenter deposition	2.6
3/12/23	JW	review jury instructions and verdict form edits	.4
3/13/23	JW	prepare proposed stipulations for trial	1.2
3/14/23	JW	review MIL and jury instructions edits	A
3/14/23	JW	review proposed stipulations edits	.1
3/14/23	JW	review and edit proposed stipulations	.2
3/16/23	JW	continue work on stipulations, jury instruction, designations, MILs	4.3

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Date	Attorney	Description	Time
3/17/23	JW	finalize stipulations, jury instructions, designations, MILs	7.6
3/17/23	JW	work on joint pretrial statement	.5
3/17/23	JW	review email and attachments from defense counsel with 3.17.23 agreed production of information	.7
3/17/23	JW	research TILA bench trial issues	1.2
3/19/23	JW	prepare joint pretrial statement	1.2
3/20/23	JW	finalize draft of final pretrial statement	2.6
3/20/23	JW	review potential themes of case	.4
3/20/23	JW	email opposing counsel regarding meeting Wednesday	.1
3/20/23	JW	continue preparing pretrial order	1.3
3/20/23	JW	prepare email to opposing counsel regarding time available for meet and confer	.1
3/21/23	JW	review fifth third draft pretrial order and appendixes	.8
3/21/23	JW	review email from fifth third counsel attaching pretrial order	.1
3/21/23	JW	finalize and prepare draft pretrial order and appendixes	4.8
3/21/23	JW	review email from opposing counsel regarding meet and confer	.1
3/21/23	JW	finalize draft of final pretrial statement	2.6
3/21/23	JW	review potential themes of case	.4
3/21/23	JW	email opposing counsel regarding meeting Wednesday	

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Date	Attorney	Description	Time
3/22/23	JW	prepare for call with Fifth Third	4.2
3/22/23	JW	call with opposing counsel regarding pretrial order, jury instructions, etc.	2.6
3/22/23	JW	begin review of defendant's exhibits for objections	1.2
3/22/23	JW	prepare amended exhibit list	.2
3/22/23	JW	review numerous emails from opposing counsel	.3
3/23/23	JW	review pleadings, records, etc regarding follow up to joint pretrial order meet and confer	.7
3/23/23	JW	prepare email attaching amended exhibit list to opposing counsel	-d
3/23/23	JW	review email from opposing counsel regarding follow up question to exhibit list	.1
3/23/23	JW	prepare email responding to opposing counsel's email regarding exhibit list.	.1
3/23/23	JW	review witness objections	.1
3/24/23	JW	review trial and witness proposed objections	.3
3/24/23	JW	review proposed comments and edits to Defendant's jury instructions	.2
3/25/23	JW	23 Quarterly review of firm cases. Status update on Fifth Third. Trial strategy discussion.  Review of appendixes and pretrial order. Review of pre-trial statement. Discussion of proposed jury instructions and review of exhibits to be used at trial. Discussion of witness preparation and strategies for direct. Review of defense	4.2
3/27/23	JW	experts and discussion of strategies for cross.  review docket entries regarding outstanding motions, review pretrial order and confer on strategery for pretrial conference	3.6

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Date	Attorney	Description	Time
3/27/23	JW	review exhibits for proposed joint exhibit list and continue edited pretrial order	4.6
3/28/23	JW	review proposed edits to email to judge Barrett	.3
3/28/23	JW	finalize edits to joint pretrial order	3.2
3/28/23	JW	review transcripts and prepare objections to defendant's depo designations	2.8
3/28/23	JW	prepare email to defense counsel attaching pretrial order	.1
3/29/23	JW	continue review of transcripts and prepare objections to defendants depo designations	.8
3/29/23	JW	review and analyze order on motion for summary judgment	1.4
5/8/23	JW	review motion for attorney's fees	.2
7/19/23	JW	review email from fifth third counsel regarding motion for attorney's fee conference	.1
7/31/23	JW	review email from defense counsel to Judge's Clerk	.1
8/1/23	JW	reviewed email from fifth third counsel regarding proposed scheduling order for fee motions	.1
8/3/2023	JW	review email from Judge Barret's chambers regarding request for status conference.	.1
8/09/2023	JW	Review and edit time and declarations for mtion for attorneys fees	6.4
8/10/2023	JW	Review and edit time and initial declaration for mtion for attorneys fees	.8
9/18/2023	JW	Review and edit joint declaration	.2
9/18/2023	JW	Begin editing time sheets to only include TILA /intertwined time	1.6

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Date	Attorney	<u>Description</u>	Time
9/19/23	JW	Continue edit of time sheets and finalize firm resume	3.9
10/25/2023	JW	review and edit Plaintiff's opposition to Fifth Third's Motion to Strike Plaintiffs Supplemental Declaration	.9
12/11/23	JW	prepare for case management conference	.8
12/11/23	JW	case management conference	.4
12/11/23	JW	post case management conference call to discuss briefing, discovery etc.	.9
12/11/23	JW	review minutes of case management conference	.1
12/12/23	JW	prepare interrogatories re plaintiffs claim for attorneys fees	.4
12/20/23	JW	Review draft revised motion for fees with declaration	.6
12/20/23	JW	Revise and finalize timesheets and declaration for motion for fees	.9

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Date	Attorney	Description	Time
12/15/12	AW	Quarterly review of cases; Status update on Fifth Third case; discussed strategy moving forward against 5thThird, discussed for complaint against Fifth-Third, review of current complaint, suggested amendments to complaint, TILA discussion and discussion of adding counts to complaints.	.2
3/16/13	AW	Quarterly review of firm; Status update on Fifth Third case; discussed potential defenses to complaint, discussed motion for extension to complaint additional; discussion about costs moving forward.	1.3
4/18/13	AW	Review and edit response to motion to dismiss conference with JW	1.0
6/4/13	AW	Finalized response to Klopfenstein counsel's motion to be appointed interim class counsel	0.8
6/2913	AW	Quarterly review of firm cases; discussed status of Fifth Third cases.  Discussed leadership structure, costs moving forward, discussion of venue and transfer choice of law, TILA implications and choice of law provisions.	1.7
9/29/13	AW	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed transfer of venue and preferred choice of venue; , discussed lead plaintiff's counsel committee. Discussed law regarding contacting former employees of Fifth Third. Discussed recent status conference.	2.3
10/7/13	AW	Reviewed and edited first complete draft of consolidated complaint	.9
12/21/13	AW	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed consolidated complaint,  Advised of updated costs and projected costs moving forward.	1.5
1/17/14	AW	Reviewed and revised cash advanced section and general sections of response to Motion to Dismiss	1.2
3/29/14	AW	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed status of motion to dismiss, discussed response to motion to dismiss; discussed reply brief motion to dismiss.	1.6
6/21/14	AW	Quarterly review of firm cases; Status update on Fifth Third case;  Discussed reply brief and potential responses from Fifth Third.	1.4
9/27/14	AW	Quarterly review of firm cases; Status update on Fifth Third; discussed Fifth Third's MTD,	1.1

Date Attorney Description Time AW Quarterly review of firm cases; Status update on Fifth Third; 12/13/14 .8 Discussed pending Motion to dismiss and discussed steps moving forward. Advised of updated costs and discussion of projected costs moving forward. 3/21/15 AW Quarterly review of firm cases; Status update on Fifth Third; .4 discussion of motion to dismiss status and steps for moving forward. AW Quarterly review of firm cases; Status update on Fifth Third. 2.3 6/29/15 Discussed status of abuse of discretion for plaintiff's amended complaint. Discussed motion for reconsideration. Discussed results of status conference. Reviewed discovery and responses and discussed confidentiality order submitted by Fifth Third. 9/19/15 AW Quarterly review of firm cases; Status update on Fifth Third. 1.3 Discussed protective order, discovery responses. AW Quarterly review of firm cases; Status update on Fifth Third. 12/12/15 1.7 Discussed status of settlement offer. Discussed status conference. Discussed mediation and discussed mediation settlement statement. Advised of updated costs and discussion of projected costs moving forward. Quarterly review of firm cases; Status update on Fifth Third. .7 3/19/16 AW Discussed settlement status and strategy for mediation. 6/25/16 AW Quarterly review of firm cases; Status update on Fifth Third. Reviewed proposed letter sent to Judge regarding settlement conference. AW Quarterly review of firm cases. Status update on Fifth Third. 9/24/16 1.2 Discussed Fifth Third Term Sheet. 12/17/16 AW Quarterly review of firm cases. Status update on Fifth Third. 1.3 Discussed settlement status, class size and review of specific terms of settlement. Advised of updated costs and discussion of projected costs moving forward. 3/26/17 AW Quarterly review of firm cases. Status update on Fifth Third. Status of 1.6 settlement and discussion of the breakdown of the damages. 6/17/17 AW Quarterly review of firm cases, Status update on Fifth Third. .6 Discussed settlement status and proposed breakdown of damages.

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Date	Attorney	Description	Time
9/23/17	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed status conference with Judge and reviewed and discussed summary of status conference. Discussed settlement status	.9
5/10/18	AW	Conference with JW regarding settlement position	.1
6/29/19	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed new strategies moving forward.	2.1
9/21/19	AW	Quarterly review of firm cases. Status update on Fifth Third, Discussed recent phone conference with defense counsel. Discussed discovery issues and status of outstanding responses.	.9
12/14/19	AW	Quarterly review of firm cases. Status update on Fifth Third, Discussed upcoming depositions and preparation of witnesses. Discussed discovery issues and status of responses. Discussed discovery disputes.  Advised of updated costs and projected costs moving forward.	1.3
3/28/20	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed recent depositions of Fyock, Harrison, Discussed email from counsel of 30(b)(6) deposition and proposed edits. Discussed and reviewed demand letter. Discussed covid status on case and issues moving forward. Discussed mediation and proposed strategies.	1.5
4/14/20	AW	Begin revisions of motion for class certification full draft	.8
4/16/20	AW	Review and edit Declaration to Appoint Class Counsel	Л
4/18/20	AW	Research TILA statue and revise issues	.5
4/20/20	AW	Review briefs and comments for same	.8
4/27/20	AW	Review motion for summary judgment	1.0
6/20/20	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed TILA statute and properly defining class. Discussed class certification status. Discussed Ohio summary judgment statute and preparation for strategies moving forward based on findings of appellate court. Discussed on going discovery. Discussed proposed mediation dates and work around with Covid. Discussed ex-parte position to be sent to Judge. Discussed notice of settlement conference and strategies to be implemented.	2.3
8/21/20	AW	Finalize and review of brief	1.0
8/31/20	AW	Continued review and edits to reply in support of certification	1.0
9/1/20	AW	Continued review and edit of reply in support of class certification	.7
9/26/20	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed proposed mediation and issues re: Covid. Discussed bankruptcy issues and impact on class. Discussed class certification and TILA claims.  Discussed mediation statement sent to judge	1.4

# EXHIBIT 9 Part B

This exhibit was split into two attachments to abide by the Southern District of Ohio's CM/ECF PDF file size limitations.

Date	Attorney	Description	Time
12/19/20	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed settlement conference. Advised of updated costs and projected costs moving forward.	.3
4/3/21	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed granting of class certification. Discussed potential appeal by Fifth Third.	.5
6/27/21	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed final notice plan. Discussed letters being sent to class reps. Discussed discovery plan moving forward. Discuss CMS and proposed edits by Fifth Third.	.8
9/25/21	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussion regarding discovery and deadlines moving forward. Discussed dismissal of Horn and Klopfenstein claims	.4
12/18/21	AW	Quarterly review of firm cases. Status update on Fifth Third, Discussed motion to amend and affirmative defense proposed by Fifth Third.  Advised of updated costs and projected costs moving forward.	.6
4/2/22	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussion of summary judgement motion. Review of expert reports. Status of trial date and outstanding discovery and remaining depositions	.5
6/25/22	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussion of case management conference. Update on most recent depositions, Howard, Erhardt and Carpenter. Discussion of demand.  Discussion of rebuttal reports from Hart, Green, Wilcox and Grice	1.9
9/7/22	AW	Review and comments on draft bankruptcy sections, conference with JW	1.6
10/1/22	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussed Fifth Third Summary judgment on TILA	1,2
10/21/22	AW	Review and edit summary judgement reply and comments regarding same	.7
12/17/22	AW	Quarterly review of firm cases. Status update on Fifth Third. Discussion regarding reply brief. Discussion regarding amended demand to be prepared. Discussion of settlement potential and status of case moving forward. Advised of updated costs and projected costs moving forward.	1,1

### KEVIN MCLAUGHLIN FIFTH THIRD TIME

<u>Date</u>	Attorney	<u>Description</u>	Time
09/20/12	KM	Conference with Jason Whittemore regarding potential class action against Fifth Third	0.2
12/04/12	KM	Initial client meeting with Daniel and Lori Laskaris	1.1
12/15/12	KM	Quarterly review of cases; Status update on Fifth Third case; discussed strategy moving forward against 5thThird, discussed for complaint against Fifth-Third, review of current complaint, suggested amendments to complaint, TILA discussion and discussion of adding counts to complaints.	.2
1/11/13	KM	Reviewed and revised draft Complaint.	.6
2/25/13	KM	Teleconference with Fifth Third counsel regarding whether we would be willing to discuss negotiating a settlement and request for meeting to discuss case.	.5
2/25/13	KM	Teleconference with Steve Owings, Jason Whittemore, and Brent Walker regarding strategy moving forward with Fifth Third case and contacting Plaintiff's counsel in Ohio and what data we would require from Fifth Third to discuss settlement.	.3
03/01/13	KM	Conference with Jason Whittemore regarding response to plaintiff's counsel in Ohio case request for teleconference.	.2
03/01/13	KM	Teleconference with plantiff's counsel in ohio case to discuss strategy moving forward with litigation	.9
03/04/13	KM	Meeting with Steve Owings and Jason Whittemore regarding strategy moving forward with Fifth Third case.	1.8
03/05/13	KM	Meeting with Steve Owings, Jason Whittemore and Brent Walker regarding whether or not to consolidate case with Ohio plaintiffs' case.	1.3
03/07/13	KM	Reviewed Fifth Third's Unopposed Motion for Extension of Time to Respond to Complaint	.1

Date	Attorney	Description	Time
03/07/13	KM	Reviewed Notice of Attorney Appearance by Aaron Weiss.	.1
03/07/13	KM	Reviewed proposed order by Fifth Third granting motion for extension of time to respond to complaint.	.1
3/16/13	KM	Quarterly review of firm; Status update on Fifth Third case; discussed potential defenses to complaint, discussed motion for extension to complaint additional; discussion about costs moving forward.	1.3
03/25/13	KM	Reviewed Fifth Third's proposed Motion to Transfer.	.3
04/02/13	KM	Reviewed Fifth Third's Motion to Dismiss or Transfer Venue	.3
04/02/13	KM	Teleconference with Ben Barnow and Jason Whittemore regarding strategy with Fifth Third Litigation	.2
04/02/13	KM	Teleconference with Steve Owings and Jason Whittemore to discuss teleconference with Ben Barnow regarding strategy with Fifth Third Litigation	.2
04/04/13	KM	Teleconference with Center for Responsible Lending regarding extent of Fifth Third's payday lending practice.	1.1
04/04/13	KM	Teleconference with co-counsel regarding teleconference with Fifth Third and upcoming teleconference with Ohio plaintiff's counsel.	.4
04/04/13	KM	Teleconference with Ohio Plaintiff's counsel	.3
4/17/13	KM	Reviewed and Revised Draft Response to Motion to Dismiss or Transfer Venue	1.1
4/17/13	KM	Reviewed e-mail from Alex Owings attaching his draft portion of response to Motion to Dismiss or Transfer Venue	.1
4/17/13	KM	Reviewed Alex Owings draft portion of response to Motion to Dismiss or Transfer Venue.	.2
4/24/13	КМ	Reviewed Fifth Third's Unopposed Motion for Extension of time to file reply to Plaintiffs response to motion to dismiss or transfer venue	.1

Date	Attorney	Description	Time
4/25/13	KM	Reviewed Order Granting Fifth Third's Motion for Extension of Time to File Reply to Plaintiff's Response to Motion to Dismiss or Transfer Venue	.1
5/6/13	KM	Reviewed letter from Hassan Zavareei intention to be appointed interim class counsel and enclosed Motion for Appointment as Interim Class Counsel and enclosed motion.	.5
5/6/13	KM	Reviewed Fifth Third's Reply to Plaintiff's Response in Opposition to Motion to Dismiss or Transfer	.2
5/13/13	KM	Teleconference with co counsel to discuss responding to Ohio Plaintiff's counsel's motion for appointment as interim class counsel	.4
5/14/13	KM	Reviewed Order transferring case to Southern District of Ohio	.1
5/15/13	КМ	Teleconference with co-counsel regarding whether it is in best interest of class to file MDL motion	.6
5/16/13	KM	Reviewed Judge Bertlesman Order of Recusal	.1
5/20/13	KM	Reviewed and edited draft motion for extension of time to respond to Klopfenstien counsel's motion to be named interim class counsel	.4
5/24/13	KM	Teleconference with co-counsel regarding summary of status conference	.3
5/28/13	KM	Reviewed Order granting Motion to allow Jason Whittemore to appear pro hac vice	.1
5/28/13	КМ	Reviewed Order granting Motion to allow Kevin McLaughlin to Appear Pro Hac Vice	.1
5/30/13	КМ	Teleconference with co-counsel regarding points to address in response to Klopfenstein counsel's motion to be appointed interim class counsel.	.2

Date	Attorney	Description	Time
6/03/13	КМ	Reviewed and edited response to Klopfenstein counsel's motion to be appointed interim class counsel	.9
6/6/13	КМ	Reviewed Fifth Third's Motion to Stay Pending Ruling on Motion to Dismiss in Klopfenstein	.2
6/10/13	КМ	Reviewed letter from Plaintiffs' counsel in Klopfenstein in reply to our letter of a proposed leadership structure.	.2
6/12/13	KM	Teleconference with co-counsel regarding preparation for status conference before Judge Barrett on June 13, 2013	.7
6/13/13	КМ	Reviewed Notice of Teleconference set for 06/27/13 at 12:30 by Judge Barrett	.1
6/13/13	КМ	Reviewed minute entry of status conference before Judge Barrett on 06/13/13	.1
6/14/13	КМ	Reviewed and edited motion to extend time to respond to motion to stay pending ruling on motion to dismiss in Klopfenstein	.5
6/18/13	КМ	Reviewed Klopfenstein plaintiffs' motion for leave to file their reply in support of their motion to be appointed interim class counsel.	Л
6/25/13	КМ	Reviewed Order granting Laskaris's Motion to Extend Time to Respond to Motion to Stay by Fifth Third	.1
6/25/13	KM	Reviewed Order denying Klopfenstein's' Motion for leave to file reply in response to Laskaris's response in opposition to motion for class counsel.	-1
6/27/13	КМ	Telephonically attended status conference before Judge Barrett	.6
6/27/13	KM	Reviewed minute entry from status conference	.1
6/28/13	КМ	Teleconference with Jason Whittemore to discuss summary of 06/27/13 status conference.	.3
6/2913	KM	Quarterly review of firm cases; discussed status of Fifth Third cases. Discussed leadership structure, costs moving forward, discussion of venue and transfer choice of law, TILA implications and choice of law provisions.	1.7

Date	Attorney	Description	Time
7/12/13	KM	Teleconference with Jason Whittemore regarding summary of status conference on interim lead class counsel with Judge Barrett and Klopfenstein counsel.	.2
9/26/13	KM	Teleconference with plaintiffs' counsel to discuss	.6
9/29/13	KM	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed transfer of venue and preferred choice of venue; discussed lead plaintiff's counsel committee.	2.3
10/4/13	KM	Reviewed and edited draft general background and facts section for consolidated complaint	1.2
10/15/13	KM	Made final edits to consolidated complaint	1.0
10/16/13	КМ	Reviewed draft motion to seal exhibit to consolidated complaint	.1
10/18/13	KM	Reviewed Order granting motion to seal exhibit to consolidated complaint	.1
10/18/13	KM	Reviewed Notice of Correction to Amended Complaint	.1
12/20/13	KM	Reviewed Order granting Fifth Third's motion for leave to file additional pages in Motion to Dismiss	Л
12/21/13	KM	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed consolidated complaint  Advised of updated costs and projected costs moving forward.	1.5
1/3/14	KM	Reviewed Order Granting Motion for Extension to file reply to Fifth Third's Motion to Dismiss.	.1

Date	Attorney	Description	Time
1/10/14	КМ	Reviewed and edited draft response to Fifth Third Cash Advance Exception Section for Response to Motion to Dismiss	1.5
1/21/14	КМ	Reviewed final version of response to Motion to Dismiss	.3
2/3/14	KM	Reviewed Fifth Third's motion for extension of time to file reply brief.	Л
2/3/14	KM	Reviewed Order Granting Fifth Third's Motion for extension of time to file reply brief.	.1
2/28/14	КМ	Reviewed Fifth Third's motion for extension of pages in reply brief	.1
2/28/14	КМ	Reviewed Fifth Third's Reply to Plaintiffs' Response to Motion to Dismiss	.5
3/5/14	KM	Reviewed order granting Fifth Third's motion for extension of pages in reply brief.	A
3/29/14	КМ	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed status of motion to dismiss, discussed response to motion to dismiss; discussed reply brief motion to dismiss.	1.6
6/21/14	KM	Quarterly review of firm cases; Status update on Fifth Third case;  Discussed reply brief and potential responses from Fifth Third.	1.4
8/12/14	KM	Reviewed Fifth Third's Notice of Supplemental Authority with attached authority in support of Motion to Dismiss	.1
8/18/14	KM	Reviewed Fifth Third's response to Plaintiffs' Notice of Supplemental Authority	.1
9/27/14	KM	Quarterly review of firm cases; Status update on Fifth Third; discussed Fifth Third's MTD,	1.1
12/13/14	KM	Quarterly review of firm cases; Status update on Fifth Third; Discussed pending Motion to dismiss and discussed steps moving forward. Advised of updated costs and discussion of projected costs moving forward.	.8

Date	Attorney	Description	Time
3/21/15	КМ	Quarterly review of firm cases; Status update on Fifth Third; discussion of motion to dismiss status and steps for moving forward.	.4
3/30/15	KM	Reviewed Order on Motion to Dismiss	.2
4/23/15	КМ	Reviewed Order granting Fifth Third's Motion for Extension of Time to Answer complaint	.1
4/27/15	KM	Reviewed Fifth Third's Answer	.3
6/29/15	KM	Quarterly review of firm cases; Status update on Fifth Third.  Discussed status of abuse of discretion for plaintiff's amended complaint. Discussed motion for reconsideration. Discussed results of status conference. Reviewed discovery and responses and discussed confidentiality order submitted by Fifth Third.	2.3
8/31/15	KM	Reviewed Notice of Status Conference	.1
9/8/15	KM	Reviewed Fifth Third's notice of withdrawal by attorney Aaron Weis	.1
9/19/15	KM	Quarterly review of firm cases; Status update on Fifth Third. Discussed protective order, discovery responses.	1.3
10/15/15	KM	Reviewed status conference minutes	.1
11/16/15	КМ	Reviewed Notice of Rescheduling Status Conference	.1
12/12/15	KM	Quarterly review of firm cases; Status update on Fifth Third. Discussed status of settlement offer. Discussed status conference. Discussed mediation and discussed mediation settlement statement. Advised of updated costs and discussion of projected costs moving forward.	1.7
3/19/16	KM	Quarterly review of firm cases; Status update on Fifth Third. Discussed settlement status and strategy for mediation.	.7
6/25/16	KM	Quarterly review of firm cases; Status update on Fifth Third. Reviewed proposed letter sent to Judge regarding settlement conference.	.9

Date	Attorney	Description	Time
9/24/16	КМ	Quarterly review of firm cases. Status update on Fifth Third. Discussed Fifth Third Term Sheet.	1.2
10/6/16	KM	Reviewed final MOU from defendant	.2
12/17/16	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed settlement status, class size and review of specific terms of settlement. Advised of updated costs and discussion of projected costs moving forward.	1.3
1/30/17	KM	Reviewed and edited various versions proposed demand letter	.2
3/22/17	KM	Reviewed Minute Entry from Judge Barrett	.1
3/26/17	КМ	Quarterly review of firm cases. Status update on Fifth Third. Status of settlement and discussion of the breakdown of the damages.	1.6
4/12/17	KM	Reviewed Fifth Third's letter to Judge Barrett regarding mediation	.2
6/17/17	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed settlement status and proposed breakdown of damages.	.6
8/9/17	KM	Reviewed update on call with Judge Barrett	,1
8/30/17	КМ	Reviewed update on scheduled call with Judge Barrett for 9/5/17	.1
9/7/17	KM	Reviewed email from Judge's Clerk regarding scheduling conference call	.1
9/20/17	KM	Prepared for status conference call with Court	.3
9/20/17	KM	Telephone status conference with Court	.7
9/23/17	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed status conference with Judge and reviewed and discussed summary of status conference. Discussed settlement status	.9

Date	Attorney	Description	Time
11/15/17	КМ	Attended telephone conference with Fifth Third counsel regarding scheduling litigation as stay removed	.5
12/16/17	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed Mediation, Discussed pending stay. Discussed appeal	2.1
4/23/18	KM	Reviewed final draft of Plaintiff's Notice of Appeal	,1
6/28/19	KM	Reviewed Order granting Motion for hearing	.1
6/29/19	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed new strategies moving forward. Discussed class certification cases.	2.1
7/1/19	KM	Reviewed minute entry from court	.1
7/31/19	KM	Reviewed Minute Entry from Court	.1
9/11/19	KM	Reviewed ORDER granting [117] Motion for Leave to Appear Pro Hac Vice of Anna C. Haac	.1
9/21/19	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed recent phone conference with defense counsel. Discussed discovery issues and status of outstanding responses.	,9
10/16/19	KM	Reviewed Notice of Appearance by Dante Marinucci	.1
10/16/19	КМ	Reviewed NOTICE of Appearance by Sam Anthony Camardo	.1
10/16/19	КМ	Reviewed AMENDED ANSWER to [68] Amended Complaint	.2
10/29/19	KM	Reviewed NOD of Lori Laskaris	.1
10/29/19	KM	Reviewed NOD of Diana Horn	.1

<u>Date</u>	Attorney	Description	Time
10/29/19	KM	Reviewed NOD of Danielle Laskaris	.1
10/29/19	KM	Reviewed NOD of Williams Klopfenstein	.1
10/29/19	KM	Reviewed NOD of Lyn Adanich	.1
10/29/19	KM	Reviewed NOD of Adam MCKinney	.1
10/29/19	KM	Reviewed NOD of Donald Adanich	.1
10/29/19	KM	Reviewed NOD of Brian Harrison	.1
10/29/19	KM	Reviewed NOD of Janet Fyock	.1
10/31/19	KM	Reviewed Minute Entry for proceedings held before Judge Michael R. Barrett	.1
11/18/19	KM	Reviewed amended notice of depo to d. laskaris	.1
11/18/19	KM	Reviewed amended notice of depo to L. laskaris	.1
11/26/19	KM	Reviewed amended notices of deposition	.1
12/14/19	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed upcoming depositions and preparation of witnesses. Discussed discovery issues and status of responses. Discussed discovery disputes.  Advised of updated costs and projected costs moving forward.	1.3
12/16/19	KM	Reviewed Order granting Joint Motion to Amend Agreed Calendar	.1
12/23/19	KM	Reviewed Mtn to Appear pro hac Erich Schork	.1
1/3/20	KM	Reviewed STIPULATION of Dismissal of Plaintiff Lyn Adanich	.1
1/3/20	KM	Reviewed NOTICE by Plaintiffs Donald E. Adanich	.1
2/10/20	KM	Reviewed Amended Notice of Taking Deposition	.1

<u>Date</u>	Attorney	<u>Description</u>	Time
2/20/20	KM	Reviewed MOTION for Leave to Appear Pro Hac of Enu A. Mainigi	.1
2/20/20	KM	Reviewed MOTION for Leave to Appear Pro Hac of Craig D. Singer	.1
2/20/20	KM	Reviewed MOTION for Leave to Appear Pro Hac of Kenneth C. Smurzynski	.1
2/20/20	KM	Reviewed MOTION for Leave to Appear Pro Hac of Risha Asokan	.1
2/24/20	KM	Reviewed the NOTICE of Hearing:	.1
2/24/20	KM	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Enu A. Mainig	.1
2/24/20	KM	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Craig D. Singer	.1
2/24/20	KM	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Kenneth C. Smurzynski	.1
2/24/20	KM	Reviewed NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Risha Asokan	.1
3/24/20	KM	Reviewed email from Judge Barrett's clerk regarding mediation	.1
3/25/20	KM	Reviewed stuarts final edits to mediation statement to judge	.2
3/28/20	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed recent depositions of Fyock, Harrison. Discussed email from counsel of 30(b)(6) deposition and proposed edits. Discussed and reviewed demand letter. Discussed covid status on case and issues moving forward. Discussed mediation and proposed strategies.	1.5
5/5/20	KM	review and edit plaintiff's motion for summary judgment	.8
6/3/20	KM	Reviewed minute entry from the Court	.1
6/8/20	KM	reviewing follow up email from Judge Barrett's law clerk regarding scheduling mediation	.1

Date	Attorney	Description	Time
6/10/20	KM	Reviewed Notice of Settlement Conference	.1
6/20/20	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed TILA statute and properly defining class. Discussed class certification status. Discussed Ohio summary judgment statute and preparation for strategies moving forward based on findings of appellate court. Discussed on going discovery. Discussed proposed mediation dates and work around with Covid. Discussed ex-parte position to be sent to Judge. Discussed notice of settlement conference and strategies to be implemented.	2.3
7/17/20	KM	review defendants' motion to file under seal	.1
7/21/20	КМ	Reviewed notice of sealed document	.1
7/21/20	КМ	Reviewed ORDER granting [139] Motion to File Document Under Seal	.1
8/6/20	КМ	Reviewed Order granting Joint stipulation to extend deadline for plf to file Reply in support of Class Certification	.1
8/11/20	KM	Reviewed minute entry from court	.1
9/2/20	КМ	final review of reply in support of class certification	.3
9/15/20	КМ	reviewing defense counsel's response as to why sur-reply necessary	J
9/15/20	КМ	reviewing defense counsel's request to file sur-reply	.1
9/23/20	КМ	reviewing notice of status conference	.1
9/24/20	КМ	review of status conference minutes	.1
9/24/20	KM	Reviewed Minute Entry for proceedings	.1

Date	Attorney	Description	Time
9/26/20	KM	Quarterly review of firm cases, Status update on Fifth Third.  Discussed proposed mediation and issues re: Covid. Discussed bankruptcy issues and impact on class. Discussed class certification and TILA claims.  Discussed mediation statement sent to judge	1.4
9/30/20	KM	Reviewed Minute Entry for settlement conference	.1
12/19/20	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed settlement conference. Advised of updated costs and projected costs moving forward.	.3
2/5/21	KM	review order granting defendant's motion to file sur-reply	.1
2/5/21	KM	review Fifth Third's Sur-Reply in opposition to class certification	.2
2/23/21	КМ	review notice of withdrawal of counsel Risha Asokan	1.
2/26/21	KM	review court's order granting motion for class certification	.3
4/3/21	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed granting of class certification. Discussed potential appeal by Fifth Third.	.5
4/6/21	KM	review Fifth Third Motion to allow Amy Mikinlay to appear pro hac vice	.1
5/18/21	КМ	review class certification order regarding findings related to discovery	.2
5/24/21	KM	review and edit draft case management report	.3
5/26/21	KM	review final class administration notice	.2
6/27/21	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussed final notice plan. Discussed lettrs being sent to class reps. Discussed discovery plan moving forward. Discuss CMS and proposed edits by Fifth Third.	.8
6/30/21	KM	review fifth third's final edits to notice plan and declaration for notice plan.	.1

Date	Attorney	Description	Time
9/25/21	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussion regarding discovery and deadlines moving forward.  Discussed dismissal of Horn and Klopfenstein claims	.4
9/30/21	KM	review defendant's motion for class action trial plan	.2
10/1/21	КМ	review notice status report	.1
11/5/21	KM	review fifth Third reply in support of motion or bifurcated trial plan	.2
12/15/21	KM	review defendants' motion to amend answer and affirmative defense and exhibits	3
12/15/21	KM	review email to Judge Barrett from Fifth Third regarding proposed order to amend affirmative defense	.1
12/15/21	KM	review proposed order granting leave to amend answer and affirmative defenses.	J
12/18/21	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed motion to amend and affirmative defense proposed by  Fifth Third  Advised of updated costs and projected costs moving forward.	.6
2/11/22	KM	review final draft of summary judgment	.4
2/16/22	KM	review notice of telephone status conference	.1
2/22/22	KM	review order granting fifth third motion to amend answer and affirmative defense	.1
2/22/22	KM	review minute entry on status conference	.1
2/23/22	КМ	review order on leave to file amended answer by 3/1	.1
2/23/22	КМ	review notice to reset deadlines from Court	.1
2/23/22	KM	review Fifth Third's amended answer	.2

Date	Attorney	Description	Time
2/28/22	КМ	review amended affirmative defenses to decide if any additional discovery needed	.1
3/29/22	КМ	review and revise demand	.4
3/30/22	КМ	review final draft and outstanding issues related to summary judgment motion	.5
4/2/22	КМ	Quarterly review of firm cases. Status update on Fifth Third. Discussion of summary judgement motion. Review of expert reports. Status of trial date and outstanding discovery and remaining depositions	.5
4/18/22	КМ	1 review consent motion for extension of time to file answer	.1
4/20/22	КМ	review order deeming answer timely	.1
4/28/22	KM	review updated draft of demand	.2
5/12/22	KM	review email from Judges clerk re status conference	.1
5/12/22	KM	review notice of status conference	.1
5/17/22	КМ	review minute entry from court regarding case management	.1
5/19/22	KM	review email from Barrett's clerk regarding follow up status conference	.1
5/20/22	КМ	Review minutes entry from case management	.1
5/27/22	КМ	review proposed order on summary judgment briefing deadlines	.1
5/27/22	КМ	Review joint motion to amend motion for extension of time	.1
6/25/22	КМ	Quarterly review of firm cases. Status update on Fifth Third.  Discussion of case management conference. Update on most recent depositions, Howard, Erhardt and Carpenter. Discussion of demand.	1.9
		Discussion of rebuttal reports from Hart, Green, Wilcox and Grice	

<u>Date</u>	Attorney	Description	Time
6/29/22	KM	Review motion for leave to appear pro hac by Pellegrino	.1
6/30/22	KM	Review order granting pro hac motion from Pellegrino	J -
10/1/22	KM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed Fifth Third Summary judgment on TILA and response brief strategies.	1.2
10/20/22	KM	continued edits of reply in support of summary judgment	.5
12/17/22	KM	Quarterly review of firm cases. Status update on Fifth Third. Discussion regarding reply brief. Discussion regarding amended demand to be prepared. Discussion of settlement potential and status of case moving forward. Advised of updated costs and projected costs moving forward.	1.1
1/13/23	KM	review final draft of settlement demand response	.1
1/17/23	KM	review email from Judge Barrett's clerk regarding status conference availability	.1
1/18/23	KM	review notice of case management conference	.1
1/27/23	KM	review jury instructions	.2
2/6/23	КМ	review order by judge Barrett on similar motion to dismiss against fifth third	.2
2/18/23	KM	review motion in limine to exclude Hart	.2
2/21/23	KM	review motion in limine to exclude grice and green	.2
3/2/23	KM	review pretrial order submission	.1
3/19/23	KM	Review joint pretrial statement	.5
3/21/23	KM	Review draft pretrial order and appendixes	.6

Date	Attorney	Description	Time
3/25/23	KM	Quarterly review of firm cases. Status update on Fifth Third. Trial strategy discussion.  Review of order of proof. Review of appendixes and pre-trial order. Review of pre-trial statement. Discussion of proposed jury instructions and review of exhibits to be used at trial. Discussion of witness preparation and strategies for direct. Review of defense experts and discussion of strategies for cross. Review of defense exhibits.	4.2

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# Case: 1:12-cv-00851-MRB Doc #: 303-11 Filed: 12/26/23 Page: 21 of 78 PAGEID #: 10655 MICHAEL MCLAUGHLIN FIFTH THIRD TIME

Date	Attorney	Description	Time
12/15/12	ММ	Quarterly review of cases; Status update on Fifth Third case; discussed strategy moving forward against 5thThird, discussed for complaint against Fifth-Third, review of current complaint, suggested amendments to complaint, TILA discussion and discussion of adding counts to complaints.	2.1
3/16/13	MM	Quarterly review of firm; Status update on Fifth Third case; discussed potential defenses to complaint, discussed motion for extension to complaint additional; discussion about costs moving forward.	1.3
6/29/13	ММ	Quarterly review of firm cases; discussed status of Fifth Third cases. Discussed leadership structure, costs moving forward, discussion of venue and transfer choice of law, TILA implications and choice of law provisions.	1.7
9/29/13	MM	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed transfer of venue and preferred choice of venue; discussed lead plaintiff's counsel committee.  Discussed recent status conference.	2.3
10/16/13	MM	Reviewed draft motion to seal exhibit to consolidated complaint.	.1
10/18/13	MM	Reviewed Notice of Correction to Amended Complaint	.1
12/16/13	MM	Reviewed Fifth Third's Motion to Dismiss Consolidated Complaint	.5
12/20/13	MM	Reviewed Order granting Fifth Third's motion for leave to file additional pages in Motion to Dismiss.	.1
12/21/13	MM	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed consolidated complaint,  Advised of updated costs and projected costs moving forward.	1.5
1/3/14	ММ	Reviewed Order Granting Motion for Extension to file reply to Fifth Third's Motion to Dismiss.	.1
1/16/14	ММ	Reviewed article discussing regulatory review of banks providing pay day advances	.1
1/17/14	ММ	Reviewed article regarding Fifth Third cancelling Early Access loan program	.1
1/21/14	MM	Reviewed final version of response to Motion to Dismiss	.7
2/3/14	MM	Reviewed Fifth Third's motion for extension of time to file reply brief.	.1

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Date	Attorney	Description	Time
2/3/14	ММ	Reviewed Order Granting Fifth Third's Motion for extension of time to file reply brief.	.1
2/28/14	MM	Reviewed Fifth Third's motion for extension of pages in reply	.1
2/28/14	MM	Reviewed Fifth Third's Reply to Plaintiffs' Response to Motion to Dismiss	.8
3/5/14	MM	Reviewed order granting Fifth Third's motion for extension of pages in reply brief.	.1
3/29/14	MM	Quarterly review of firm cases; Status update on Fifth Third Case; Discussed status of motion to dismiss, discussed response to motion to dismiss; discussed reply brief motion to dismiss.	1.6
6/16/14	MM	Read recent Supreme Court of Ohio opinion	.6
6/21/14	MM	Quarterly review of firm cases; Status update on Fifth Third case;	1.4
		Discussed reply brief and potential responses from Fifth Third.	
8/12/14	ММ	Reviewed and edited proposed supplemental authority in opposition to Fifth Third's Motion to Dismiss	.2
8/18/14	MM	Reviewed Fifth Third's response to Plaintiffs' Notice of Supplemental Authority	,1
9/27/14	ММ	Quarterly review of firm cases; Status update on Fifth Third; discussed Fifth Third's MTD,	1.1
12/13/14	ММ	Quarterly review of firm cases; Status update on Fifth Third; Discussed pending Motion to dismiss and discussed steps moving forward. Advised of updated costs and discussion of projected costs moving forward.	.8
3/21/15	ММ	Quarterly review of firm cases; Status update on Fifth Third; discussion of motion to dismiss status and steps for moving forward.	.4
3/30/15	MM	Reviewed Fifth Third's response to Plaintiffs' Notice of Supplemental Authority	.4
4/27/15	MM	Reviewed Fifth Third's Answer	.3
6/25/15	ММ	Prepared suggested edits to confidentiality order proposed by Fifth Third	.2
6/29/15	ММ	Quarterly review of firm cases; Status update on Fifth Third.  Discussed status of abuse of discretion for plaintiff's amended complaint. Discussed motion for reconsideration. Discussed results of status conference. Reviewed discovery and responses and discussed confidentiality order submitted by Fifth Third.	2.3

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Date	Attorney	Description	Time
7/15/15	MM	Reviewed final letter to Fifth Third regarding discovery responses	.2
7/16/15	MM	Reviewed final protective order for approval	.5
8/7/15	MM	Reviewed e-mail from Fifth Third counsel Karl Fanter attaching discovery request response letter	.1
8/31/15	MM	Reviewed Notice of Status Conference	.1
9/19/15	MM	Quarterly review of firm cases; Status update on Fifth Third.  Discussed protective order, discovery responses.	1.3
9/23/15	MM	Reviewed summary of Fifth Third's production in response to discovery requests	.1
10/15/15	MM	Reviewed status conference minutes	.1
11/25/15	MM	Reviewed minute entry regarding request from judge for ex parte summary for purposes of mediation	.1
12/4/15	MM	Reviewed initial draft of mediation letter to Judge Barrett	.2
12/5/15	MM	Reviewed comments and suggestions for edits from co-lead	.4
12/9/15	MM	Reviewed and edited final draft of letter to Judge Barrett	.3
12/12/15	ММ	Quarterly review of firm cases; Status update on Fifth Third.  Discussed status of settlement offer. Discussed status conference.  Discussed mediation and discussed mediation settlement statement.  Advised of updated costs and discussion of projected costs moving forward.	1.7
3/19/16	MM	Quarterly review of firm cases; Status update on Fifth Third. Discussed settlement status and strategy for mediation	.7
6/25/16	ММ	Quarterly review of firm cases; Status update on Fifth Third. Reviewed proposed letter sent to Judge regarding settlement conference.	.9
9/20/16	MM	Reviewed email from Hassan regarding Fifth Third's agreement to	.1
9/23/16	MM	Reviewed proposed term sheet for settlement	.2
9/24/16	ММ	Quarterly review of firm cases, Status update on Fifth Third.  Discussed Fifth Third Term Sheet.	1.2
11/10/16	MM	Reviewed draft settlement agreement	.4
11/28/16	MM	Reviewed initial class size information provided by Fifth Third.	.1

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Date	Attorney	Description	Time
12/1/16	MM	Reviewed initial draft of class action settlement	.8
12/12/16	MM	Reviewed email from Defense counsel regarding status of review of initial settlement agreement draft	.1
12/17/16	MM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed settlement status, class size and review of specific terms of settlement. Advised of updated costs and discussion of projected costs moving forward.	1.3
12/23/16	MM	Reviewed email correspondence regarding defense counsel's response to our concerns with current settlement in light of damages	.3
1/13/17	MM	Reviewed draft demand letter	.2
1/14/17	MM	Reviewed email from Judge Barrett's clerk regarding checking with the Judge on potential conference	.1
1/30/17	MM	Reviewed summary of call with Judge Barrett	.1
1/30/17	MM	Reviewed and edited various versions proposed demand letter	.2
2/10/17	MM	Reviewed letter from Fifth Third in response to our demand letter	.1
3/10/17	MM	Reviewed final version of email to defense counsel	.1
3/17/17	MM	Reviewed final demand letter to Fifth Third	.1
3/22/17	MM	Reviewed Minute Entry from Judge Barrett	.1
3/26/17	ММ	Quarterly review of firm cases. Status update on Fifth Third. Status of settlement and discussion of the breakdown of the damages.	1.6
3/31/17	MM	Reviewed final mediation letters to Judge Barrett and to defense counsel	.2
4/12/17	MM	Reviewed Fifth Third's letter to Judge Barrett regarding mediation	.2
6/17/17	MM	Quarterly review of firm cases. Status update on Fifth Third. Discussed settlement status and proposed breakdown of damages.	.6
9/23/17	ММ	Quarterly review of firm cases. Status update on Fifth Third.  Discussed status conference with Judge and reviewed and discussed summary of status conference. Discussed settlement status.	.9
12/16/17	ММ	Quarterly review of firm cases. Status update on Fifth Third. Discussed Mediation, Discussed pending stay. Discussed appeal	2.1

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Date	Attorney	Description	Time
6/16/19	MM	Reviewed additional research on Class Cert cases	.1
6/20/19	MM	Reviewed edits of co-counsel	.2
6/20/19	MM	Reviewed statement documents of from client re; data expert call	.2
6/20/19	MM	Reviewed email from Co-counsel w/ case law re: class certification	.5
6/20/19	ММ	Reviewed email and memo on Second Revised Memo Resolving Ambiguous Terms in Adhesion Contracts	.2
6/21/19	MM	Reviewed email from Art Olsen at Cassistech	.1
6/28/19	MM	Reviewed Order granting Motion for hearing	.1
6/29/19	MM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed new strategies moving forward. Discussed class certification cases. Discussed upcoming case management order.  Discussed ambiguity of terms in adhesion contracts. Discussed discovery strategy and best approaches to take.	2.1
9/21/19	ММ	Quarterly review of firm cases. Status update on Fifth Third. Discussed recent phone conference with defense counsel. Discussed discovery issues and status of outstanding responses.	.9
7/1/19	ММ	Reviewed minute entry from court	.1
7/11/19	MM	final review of as served Second Interrogatories to Def. copy	.1
7/23/19	MM	Reviewed proposed discovery plan from defense counsel	.1
7/29/19	MM	Reviewed revised draft of discovery plan	.1
7/31/19	MM	Reviewed Minute Entry from Court	,1
8/16/19	MM	Reviewed Initial Discovery to Plaintiffs	.4
8/18/19	MM	Reviewed case from the 6th circuit	.3
8/30/19	MM	Reviewed Def's Rule 26 disclosures	.1
9/5/19	MM	Reviewed email from co-counsel regarding discovery letter	.1
9/6/19	MM	Reviewed email with additional edits	
10/16/19	MM	Reviewed AMENDED ANSWER to [68] Amended Complaint	.2
10/29/19	MM	Reviewed payday loan summary	.1
10/29/19	MM	Reviewed email from co-counsel re: description of codes	.1
10/29/19	MM	Reviewed email from defense counsel attaching letter and NOD	
10/29/19	MM	Reviewed 10/29/19 letter from defense counsel	A
10/29/19	MM	Reviewed email from co-counsel about scheduling a meet and confer	.1

Case: 1:12-cv-00851-MRB Doc #: 303-11 Filed: 12/26/23 Page: 26 of 78 PAGEID #: 10660 Description Time Date Attorney 10/29/19 MM Reviewed email from co-counsel about laying out position in writing .1 10/30/19 MM Reviewed email from Karl Fanter re; production .1 10/31/19 MM Reviewed Minute Entry for proceedings held before Judge Michael .I R. Barrett 11/7/19 MM Reviewed PIf's Amended responses to discovery 3 11/8/19 MM review and suggest edits to letter re; dismissal of Klopfenstein and 2 Adanich 11/29/19 MM Reviewed motion to amend agreed calendar .1 11/29/19 Reviewed draft proposed order to amend calendar .1. MM Reviewed email from D. Marinucci 12/2/19 MM .1 12/2/19 MM Reviewed production log .1 Reviewed records forwarded by co-counsel regarding fifth third terms 12/2/19 .6 MM and conditions .1 12/2/19 MM Reviewed good faith email to fifth third regarding terms and conditions 12/4/19 MM Reviewed email from OC re: Mtn to Amend Calendar .I 12/6/19 MM Reviewed email from OC re: proposed order .1 12/9/19 MM reviewed email from Dante Marinucci regarding good faith letter .1 12/14/19 MM Quarterly review of firm cases. Status update on Fifth Third. 1.3 Discussed upcoming depositions and preparation of witnesses. Discussed discovery issues and status of responses. Discussed discovery disputes. Advised of updated costs and projected costs moving forward 12/16/19 MM Reviewed Order granting Joint Motion to Amend Agreed Calendar .1 MM Reviewed draft of Motion to Dismiss for Klopfenstein and Horn .1 1/8/20 .9 1/8/20 MM review deposition transcript of Lori Laskaris 1/8/20 MM review deposition transcript of Daniel Laskaris .6 3/16/20 MM Reviewed email from Co-counsel to OC .1 3/16/20 MM Reviewed reply email from OC re: 30(b)(6) Deposition .1 3/16/20 MM Reviewed reply email from co-counsel re: 30(b)(6) Deposition .1 3/16/20 MM Reviewed email from OC 30(b)(6) Deposition .1 3/23/20 MM Final review and edits to demand letter 2 3/25/20 MM Reviewed stuarts final edits to mediation statement to judge .2

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Date	Attorney	Description	Time
3/28/20	ММ	Quarterly review of firm cases. Status update on Fifth Third.  Discussed recent depositions of Fyock, Harrison. Discussed email from counsel of 30(b)(6) deposition and proposed edits. Discussed and reviewed demand letter. Discussed covid status on case and issues moving forward. Discussed mediation and proposed strategies	1.5
4/10/20	ММ	review correspondence regarding TILA and breach of contract statute of limitations for purposes of defining class	.2
4/20/20	MM	review final version and edits for class certification brief.	.7
6/10/20	MM	Reviewed Notice of Settlement Conference	.1
6/20/20	ММ	Quarterly review of firm cases. Status update on Fifth Third.  Discussed TILA statute and properly defining class. Discussed class certification status. Discussed Ohio summary judgment statute and preparation for strategies moving forward based on findings of appellate court. Discussed on going discovery. Discussed proposed mediation dates and work around with Covid. Discussed ex-parte position to be sent to Judge. Discussed notice of settlement conference and strategies to be implemented.	2.3
7/8/20	MM	review email to opposing counsel regarding data request	,1
7/17/20	MM	reviewing exhibit attached to defense counsel email regarding filing under seal	şI
7/17/20	MM	review email from defense counsel regarding motion to seal	.1
7/21/20	ММ	Reviewed ORDER granting [139] Motion to File Document Under Seal	.1
7/29/20	MM	review of email from defense counsel agreeing to stipulation for deadline to file reply brief	.1
7/31/20	MM	reviewing email from defense counsel confirming approval of proposed joint stipulation	.1
9/2/20	MM	final review of reply in support of class certification	.3
9/24/20	MM	review of status conference minutes	1
9/24/20	MM	Reviewed Minute Entry for proceedings	
9/26/20	MM	Quarterly review of firm cases, Status update on Fifth Third.  Discussed proposed mediation and issues re: Covid. Discussed bankruptcy issues and impact on class. Discussed class certification and TILA claims.  Discussed mediation statement sent to judge.	1.4
12/19/20	ММ	Quarterly review of firm cases. Status update on Fifth Third.  Discussed settlement conference. Advised of updated costs and projected costs moving forward.	

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Date	Attorney	Description	Time
4/3/21	ММ	Quarterly review of firm cases. Status update on Fifth Third. Discussed granting of class certification. Discussed potential appeal by Fifth Third.	.5
4/20/21	MM	review finalized 4th roggs and 3rd rtp to fifth third	.2
4/22/21	ММ	review email from Cam Azari regarding information needed to prepare adequate notice to class members	.1
4/27/21	ММ	review email from Epiq regarding information needed on former addresses.	-,1
4/29/21	MM	review email from Cam Azari regarding draft certification notice	.1
4/29/21	MM	review draft notice from Epiq	.4
5/7/21	ММ	review email from Fifth Third counsel confirming status of request for information necessary to provide notice to class	1
5/14/21	М	review email form Fifth Third counsel regarding status of notice information.	.1
5/18/21	ММ	review email from Fifth Third Counsel regarding draft Calendar Order and discovery status	.1
5/21/21	MM	review email from Fifth Third providing notice information for class	.1
5/24/21	MM	review revised draft notice plan	.4
5/24/21	MM	review final draft of notice plan	.2
6/3/21	MM	review additional topics for 5/3 30b6 deposition	.1
6/3/21	MM	review email to Epiq regarding notice changes	.1
6/7/21	ММ	reviewed revised notice plan and email to fifth third counsel regarding revised notice plan	.2
6/9/21	MM	review email from defense counsel regarding attaching proposed edits to notice plan	.1
6/9/21	MM	review edited notice plan	.2
6/10/21	MM	review emails with Epiq regarding Fifth Third's proposed edits.	.2
6/10/21	ММ	review emails between defense counsel and plaintiff's counsel regarding proposed edits to notice plan re: publication	.5
6/10/21	MM	review final declaration from Epiq re: class notice	.2
6/11/21	MM	review defense counsel email attaching revised CMS	.1
6/11/21	MM	review proposed final revisions provided by Fifth Third to CMS	.2
6/14/21	ММ	review email from defense counsel attaching proposed edits to Cert Notice and Epiq declaration	.1

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<u>Date</u>	Attorney	<u>Description</u>	Time
6/14/21	MM	review defense edits to cert notice	.1
6/14/21	MM	review defense edits to Epiq declaration	.1
6/16/21	MM	review defense edits to Epiq declaration	.1
6/21/21	MM	review final CMS	.2
6/21/21	MM	review emails from Cam Azari regarding making edits to final notice drafts	.2
6/22/21	MM	review final edits to CMS from Fifth Third	.2
6/27/21	MM	Quarterly review of firm cases. Status update on Fifth Third. Discussed final notice plan. Discussed lettrs being sent to class reps. Discussed discovery plan moving forward. Discuss CMS and proposed edits by Fifth Third.	.8
6/30/21	MM	review fifth third's final edits to notice plan and declaration for notice plan.	.3
6/30/21	MM	review proposed order granting motion to provide notice to class and approving notice plan	.1
7/8/21	MM	review email from Epiq attaching example data points dictionary and how to send data documents	.1
7/8/21	MM	reviewed Epiq's how to send data to epiq document	.1
7/8/21	MM	reviewed epiq's example data dictionary.	.1
7/14/21	MM	review order granting plaintiff's motion to approve notice plan	.1
7/14/21	MM	review order setting case management deadlines	.1
8/13/21	MM	review fifth thirds second set of Interrogatories	.1
8/13/21	MM	review email from epiq confirming follow up questions regarding class notice	.1
8/13/21	MM	review Fifth Third second set of Request for Production	.1
8/16/21	MM	review and finalize good faith letter to Fifth Third	.2
8/17/21	MM	review telephone script notice for class members prepared by Epiq	.2
8/19/21	MM	reviewed email from Karl Fanter regarding good faith letter and request to respond in September	.1
8/19/21	MM	prepare email to Epiq confirming acceptance of IVR script	.1
8/19/21	MM	review email from Epiq acknowledging acceptance of IVR script	.1
8/19/21	MM	review updated email verisions of notice from epiq	.3

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Date	Attorney	Description	Time
8/24/21	MM	review email from Fifth Third counsel regarding response to good faith letter	.1
8/25/21	MM	review email notice from Epiq	1.
8/25/21	ММ	review email from Epiq responding to Plaintiff's question regarding email notice	.1
8/25/21	MM	review email from defense counsel to epiq approving notice website with caveat of activating link	,1
9/2/21	MM	review documents produced by Fifth Third	.1
9/2/21	MM	review Fifth Third letter regarding our good faith letter	.1
9/3/21	MM	review final version of 30b6	.1
9/3/21	MM	review email to Fifth Third good faith	.1
9/20/21	MM	review draft dismissal of Horn and Klopfenstein	1.
9/23/21	MM	Reviewed final of voluntary dismissal of Klopfenstein and Horn	.1
9/25/21	MM	Quarterly review of firm cases, Status update on Fifth Third. Discussion regarding discovery and deadlines moving forward. Discussed dismissal of Horn and Klopfenstein claims.	.4
9/29/21	MM	review email from defense counsel re 30b6	.1
9/30/21	ММ	review email from defense counsel to Judge Barrett attaching motion for class action trial plan	.1
9/30/21	MM	review defendant's motion for class action trial plan	.2
9/30/21	MM	review proposed order on defendant' motion for class action trial plan	.1
10/1/21	MM	review email from Epiq attaching notice status report	.1
10/14/21	MM	review email from Epiq re: draft declaration and opt out request	.1
10/14/21	MM	review proposed draft declaration	.1
10/15/21	ММ	review additional edits to response to defendant's motion for bifurcated trial plan.	.1
10/18/21	ММ	review email from defense counsel regarding confirming status of 30b6 meet and confer	.1
10/21/21	MM	review information on proposed experts re: APR term	.3
10/21/21	MM	review final edits to response in opposition to defendant's motion for bifurcated trial plan	.2
10/25/21	ММ	review email from Fifth Third attaching correspondence related to 8th production	-,1

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Date	Attorney	Description	Time
10/25/21	MM	review letter from Fifth Third with password to access 8 <sup>th</sup> production of documents	.1
10/25/21	MM	review email from defense counsel attaching discovery letter	.1
10/25/21	MM	review discovery good faith letter	.2
10/25/21	MM	review letter from Fifth Third regarding document production	.1
10/26/21	MM	review email from Brian Pinkerton regarding class cert notice	.1
10/29//21	MM	review email from Oliver Wyman counsel regarding availability for meet and confer	.1
11/1/21	MM	review final revisions to Fifth Third 30b6 notice	.2
11/1/21	MM	review and finalize edits to 30b6 notice	.1
11/5/21	MM	review fifth Third reply in support of motion or bifurcated trial plan	.2
11/8/21	MM	review email from defense counsel regarding meet and confer on 30b6	.1
11/9/21	MM	review email from Fifth Third counsel with counter-proposal to ESI terms	.1
11/9/21	MM	review attachments to ESI proposal email	.3
11/12/21	MM	review email form Lakaris confirming completion of ESI search terms	.1
11/12/21	MM	review email regarding Fifth Third's response to documents not viewable produced through discovery.	.1
11/16/21	MM	review letter re 11 production from Fifth Third	.1
11/16/21	MM	review email from Fifth Third counsel re 11th production	.1
11/16/21	MM	review final counterproposals to Fifth Third suggested revisions to ESI search terms	.1
11/17/21	MM	review email from defense counsel regarding plaintiff's deficient discovery responses	.1
11/17/21	MM	review letter from defense counsel regarding deficient discovery responses from plaintiffs	.1
11/18/21	MM	review transcript of Fifth Third corporate rep	.8
11/24/21	MM	review email from Fifth Third counsel regarding status of agreement to produce documents	.1
11/29/21	MM	review correspondence from Oliver Wyman Counsel regarding production in response to subpoena	.2
11/29/21	MM	review documents produced by Oliver Wyman	1.1

Case: 1:12-cv-00851-MRB Doc #: 303-11 Filed: 12/26/23 Page: 32 of 78 PAGEID #: 10666 Date Attorney Description Time 11/29/21 review fifth third's counterproposal to our counterproposal on ESI MM .I search terms 11/29/21 MM review email regarding discovery negotiations from Fifth Third .1 counsel 11/29/21 review letter from defense counsel regarding 12th production of MM .1 documents 12/3/21 MM review letter from Fifth Third counsel regarding 13th production of .1 documents review email from Oliver Wyman counsel regarding search for 12/6/21 MM .1 missing word document. review letter from Fifth Third regarding 14th production of 12/8/21 MM .1 documents 12/13/21 MM review letter from defense counsel re 15 production by fifth third .1 12/17/21 MM review email from Fifth Third counsel regarding discovery letter and .1 privilege log 12/17/21 MM review discovery letter from Fifth Third .1 MM 12/17/21 give initial review of privilege log .8 12/18/21 Quarterly review of firm cases. Status update on Fifth Third. MM .6 Discussed motion to amend and affirmative defense proposed by Fifth Third. Advised of updated costs and projected costs moving forward. 12/22/21 MM review email from Fiserve counsel regarding subpoena .1 all regarding disco and document search 1.2 12/22/21 MM .2 12/23/21 MM review document production log 12/23/21 MM prepare email to Fiserve counsel regarding subpoena .1 12/27/21 review email from Fiserve regarding scheduling phone conference MM .1 MM began review of discovery produced by 5/3 1.2 12/27/21 1/5/22 MM continued review of discovery produced by 5/3 2.1 1/5/22 review email from Fiserve counsel regarding phone conference MM .1 availability 1/5/22 MM. review email from Fifth Third counsel regarding previously .1 submitted privilege log 1/10/22 MM continued review of Fifth Third production .6

1.2

continued review of fifth third production

1/11/22

MM

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Date	Attorney	<u>Description</u>	Time
1/16/22	MM	continued review of fifth third production	2.0
1/19/22	MM	continue review of Fifth Third production	1.2
1/19/22	MM	review fifth third counsel email regarding consent motion to extend time	.1
1/19/22	MM	review fifth third suggested edits to expert disclosure deadline extension.	.1
1/29/22	MM	review hot does from supplemental production	.2
2/11/22	MM	review final draft of summary judgment	.3
2/11/22	MM	review minor edits from Aaron McReynolds to summary judgment motion	.4
2/22/22	MM	review minute entry on status conference	.1
2/23/22	MM	finalize draft of demand	.4
3/4/22	MM	review email from defense counsel re confirming not agreement on trial date	.1
3/9/22	MM	review email from judge Barrett chambers regarding April trial date	1
3/9/22	MM	review email from defense counsel re April trial date	.1
3/9/22	MM	review email from defense counsel requesting confirmation on plaintiff's damages cutoff	.1
3/9/22	MM	review Fifth Third amended response to rog 11	.1
3/10/22	MM	review email confirming subpoena service on Bruce Howard	.1
3/10/22	MM	review summary of documents issues from Disco	.1
3/13/22	MM	reviewed summary of privilege log issues	.2
3/24/22	MM	review final summary judgment draft	.4
3/28/22	MM	review email from defense counsel regarding depositions being held via zoom vs. in person	.1
4/2/22	MM	Quarterly review of firm cases. Status update on Fifth Third. Discussion of summary judgement motion. Review of expert reports. Status of trial date and outstanding discovery and remaining depositions.	.5
4/20/22	MM	review answer	.2
4/28/22	MM	review updated draft of demand	.3
5/12/22	MM	review email from Judges clerk re status conference	.1
5/17/22	MM	review minute entry from court regarding case management	.1

Description Time Date Attorney 5/18/22 MM review email from Fifth Third counsel confirming data stipulation on .1 damages 5/18/22 MM Review Howard transcript .7 Review email from Barrett clerk .1 5/19/22 MM Review minutes entry from case management .1 5/20/22 MM .2 5/20/22 MM Review Oliver latest draft .1 5/20/22 MM Review order granting motion to seal 5/26/22 MM review proposed joint motion to extend sj briefing deadlines .1 5/31/22 MM reviewed order granting joint motion for briefing schedule .1 6/1/22MM Review correspondence re rebutting economist report .2 6/2/22MM Review Fifth Third competitors APR terms .1 6/12/22 MM Review Simkovic rebuttal draft .3 6/13/22 MM read draft rebuttal report by Michael Simkovic .4 6/13/22 MM Review emails from Simkovic regarding revisions to rebuttal report .2 6/14/22 MM Review correspondence and research economist/marketing rebuttal .3 experts MM Review resumes of potential marketing rebuttal experts 6/15/22 .4 .2 MM Review edits to Rosen report 6/17/22 MM Review edits to Simkovic report .2 6/19/22 MM Review email from Simkovic regarding waiting to review further .1 6/20/22 MM Review emails from Simkovic regarding receiving revisions to report .3 6/21/22 MM Review Simkovic edits to his report .3 6/21/22 MM Review Simkovic invoice .1 .2 6/21/22 MM Review final Rosen report 6/22/22 MM finalize Simkovic report .3 6/23/22 MM Zoom conference with Simkovic .3 6/23/22 MM Finalize Simkovic report .2 6/24/22 MM Review email from defense counsel attaching rebuttal reports .1 Review multiple emails from Walker regarding question on possible .3 6/24/22 MM revision to report 6/24/22 MM Review rebuttal report of Grice .3

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Date	Attorney	Description	Time
6/25/22	MM	Quarterly review of firm cases. Status update on Fifth Third. Discussion of case management conference. Update on most recent depositions, Howard, Erhardt and Carpenter. Discussion of demand.  Discussion of rebuttal reports from Hart, Green, Wilcox and Grice	1.9
7/5/22	ММ	Review email from defense counsel regarding expert depo scheduling	.1
10/1/22	MM	Quarterly review of firm cases. Status update on Fifth Third.  Discussed Fifth Third Summary judgment on TILA and	1.2
10/19/22	MM	research	.6
10/20/22	MM	review edits to reply in support of summary judgment	.3
10/20/22	MM	review and edit reply brief	.2
11/2/22	MM	review final edits to Reply brief	
12/17/22	ММ	Quarterly review of firm cases, Status update on Fifth Third.  Discussion regarding reply brief. Discussion regarding amended demand to be prepared. Discussion of settlement potential and status of case moving forward. Advised of updated costs and projected costs moving forward.	1.1
1/5/23	MM	review email from defense counsel regarding settlement demand response	+
1/5/23	ММ	review letter from defense counsel regarding settlement demand response	4.
1/19/23	MM	review minute entry from CMC	
3/2/23	MM	review pretrial order submission	- 2
3/25/23	MM	Quarterly review of firm cases. Status update on Fifth Third, Trial strategy discussion.  Review of appendixes and pretrial order. Review of pre-trial statement. Discussion of proposed jury instructions and review of exhibits to be used at trial. Discussion of witness preparation and strategies for direct. Review of defense experts and discussion of strategies for cross. Review of defense exhibits.	4.3

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Date	Paralegal	Description	Time
10/22/12	VK	Copied and mailed letter to Florida Bar regarding request for approval of advertisement.	.1
10/31/12	VK	Reviewed email from JW re:	.1
10/31/12	VK	Reviewed email from JW re:	.1
11/5/12	VK	Reviewed email from JW re:	.2
12/18/12	VK	Scanned 141 page 5/3 early Access Summary of Key Features	.1
12/20/12	VK	Prepared Case open form for office	.1
2/12/13	VK	Filed complaint	,2
2/12/13	VK	Prepared letter to Sheriff with Summons	,1
2/12/13	VK	Downloaded and saved Complaint/Civil Cover Sheet, Judicial Assignment, Clerks notice re: venue and Summons	,1
03/06/13	VK	Downloaded and saved Clerk's Notice re: venue	.1
03/06/13	VK	Downloaded and saved Judicial Assignment	.1
03/07/13	VK	Downloaded and saved Fifth Third's Unopposed Motion for Extension of Time to Respond to Complaint	.1
03/07/13	VK	Downloaded and saved Notice of Attorney Appearance by Aaron Weiss.	.1

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Date	Paralegal	Description	Time
03/08/13	VK	Downloaded and saved endorsed order granting Fifth Third's Motion for Extension of Time to Respond to Complaint.	.1
3/25/13	VK	Downloaded and saved Fifth Third's proposed Motion to Transfer.	.1
03/26/13	VK	Downloaded and saved Notice of Attorney Appearance by Alex Owings .	.1
4/2/13	VK	Downloaded and saved Fifth Third's Motion to Dismiss or Transfer Venue	.1
4/2/13	VK	Downloaded and saved Fifth Third's Unopposed Motion to Request Hearing on Motion to Dismiss or Transfer Venue	.1
4/2/13	VK	Downloaded and saved M/Pro Hac Vice - G. Karl Fanter	.1
4/2/13	VK	Downloaded and saved M/Pro Hac Vice - Brett Wall	.1
04/03/13	VK	Downloaded and saved Order on M/Pro Hac Vice - G. Karl Fanter	.1
04/03/13	VK	Downloaded and saved Order M/Pro Hac Vice - Brett Wall	.1
4/18/13	Vk	Downloaded and saved Response to Motion to Dismiss or Transfer Venue	.1
4/24/13	VK	Downloaded and saved Fifth Third's Unopposed Motion for Extension of time to file reply to Plaintiffs response to motion to dismiss or transfer venue	.1
4/25/13	JW	Downloaded and saved Order Granting Fifth Third's Motion for Extension of Time to File Reply to Plaintiffs Response to Motion to Dismiss or Transfer Venue	.1
5/6/13	VK	Downloaded and saved letter from Hassan Zavareei intention to be appointed interim class counsel and enclosed Motion for Appointment as Interim Class Counsel and enclosed motion.	.1
5/6/13	VK	Downloaded and saved Fifth Third's Reply to Plaintiff's Response in Opposition to Motion to Dismiss or Transfer	.1
5/14/13	VK	Downloaded and saved Order transferring case to Southern District of Ohio	.1
5/14/13	VK	Downloaded and saved Notice from Clerk of transferring case to S.D. of Ohio.	.1

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<u>Date</u>	Paralegal	<u>Description</u>	Time
5/14/13	VK	Downloaded and saved Notice of assigning Judge Bertelsman to case in S.D. of Ohio.	.1
5/14/13	VK	Downloaded and saved Notice of assigning magistrate judge Stephanie Bowman to case in S.D. of Ohio.	.1
5/14/13	VK	Downloaded and saved Reviewed clerk's acknowledgement of receipt of case in S.D. of Ohio.	.1
5/14/13	VK	Downloaded and saved Clerks Notice requiring counsel to be admitted pro hac vice in Southern District of Ohio.	.1
5/16/13	VK	Downloaded and saved Judge Bertlesman Order of Recusal	.1
5/17/23	VK	Downloaded and saved NOA of additional counsel	.1
5/20/13	VK	Prepared shell of Kevin McLaughlin Affidavit for Pro Hac Vice admission	.1
5/20/13	VK	Prepared shell of Jason Whittemore Affidavit for Pro Hac Vice admission	.1
5/20/13	VK	Downloaded and saved order transferring case to Judge Michael A. Barrett	.1
5/20/13	VK	Prepared email to Adaira Davis pf Ronald Johnson (local counsel) with Affidavits of JW and KM for Pro hac Vice	.1
5/20/13	VK	Reviewed email from Adaira Davis regarding pro hac vice motion	.1
5/24/13	VK	Reviewed email from Adaira Davis regarding checks for Pro-Hac Vice admittance	.1
5/28/13	VK	Downloaded and saved Order granting Motion to allow Kevin McLaughlin to Appear Pro Hac Vice	.1
5/28/13	VK	Downloaded and saved Order granting Motion to allow Jason Whittemore to appear pro hac vice	.1
5/28/13	VK	Downloaded and saved Fifth Thid's Motion to Stay	.1
5/29/13	VK	Downloaded and saved – Notice of Returned Mail from Clerk	.1

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Date	Paralegal	Description	Time
6/5/13	VK	Downloaded and saved M/Pro Hac Vice - AO	.1
6/5/13	VK	Downloaded and saved M/Pro Hac Vice - SO	.1
6/13/13	VK	Downloaded Notice of Teleconference set for 06/27/13 at 12:30 by Judge Barrett	.1
6/13/13	VK	Downloaded minute entry of status conference before Judge Barrett on 06/13/13	.1
6/14/23	JW	Downloaded and saved Klopfenstein plaintiffs' motion for leave to file their reply in support of their motion to be appointed interim class counsel.	.1
6/25/13	VK	Downloaded and Saved Order granting Laskaris's Motion to Extend Time to Respond to Motion to Stay by Fifth Third	.1
6/25/13	VK	Downloaded and Saved Order denying Klopfenstein's' Motion for leave to file reply in response to Laskaris's response in opposition to motion for class counsel.	.1
6/27/13	VK	Downloaded and Saved minute entry from status conference	.1
7/09/13	VK	Downloaded and saved Response to Fifth Third's Motion to Stay pending ruling on Klopfenstein motion to dismiss	.1
7/10/13	VK	Downloaded and saved Klopfenstien's reply in support of motion for appointment of interim class counsel.	.1
7/11/13	VK	Reviewed email from Case Administrator of Ohio southern district	.1
8/20/13	VK	Downloaded and saved Notice of Status Conference	.1
8/30/13	VK	Downloaded and saved Plf Consent Mtn to Consolidate Cases (Doc. #65)	.1

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Date	Paralegal	Description	Time
9/12/13	VK	Downloaded and saved Order Consolidating cases	.1
9/16/13	VK	Downloaded and saved Order Granting Pro-Hac Vice - Jasper Ward (Doc. #66).	.1
9/16/13	VK	Downloaded and saved Order Granting Pro-Hac Vice - Jasper Ward (Doc. #67)	.1
10/15/13	VK	Downloaded and saved consolidated class action complaint	.1
10/16/13	VK	Downloaded and saved motion to seal exhibit to consolidated complaint.	.1
10/18/13	VK	Downloaded and saved Order granting motion to seal exhibit to consolidated complaint	.1
10/18/13	VK	Downloaded and saved Notice of Correction to Amended Complaint	.1
11/26/13	VK	Downloaded and saved as filed joint motion for extension of time to respond to Complaint drafted by Fifth Third	.1
12/16/13	VK	Downloaded and Saved Defendant's Motion for Leave to file excess pages in Motion to Dismiss Consolidated Complaint	.1
12/16/13	VK	Downloaded and Saved Order granting Fifth Third's motion for extension of time to respond to Consolidated Complaint	.1
12/16/13	VK	Downloaded and Saved Fifth Third's Motion to Dismiss Consolidated Complaint	.1
12/20/13	VK	Downloaded and saved Order granting Fifth Third's motion for leave to file additional pages in Motion to Dismiss.	.1
1/3/14	VK	Downloaded and saved Order Granting Motion for Extension to file reply to Fifth Third's Motion to Dismiss.	.1

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Date	Paralegal	Description	Time
1/21/14	VK	Downloaded and saved Plfs response to Motion to Dismiss	.1
2/03/14	VK	Downloaded and saved Fifth Third's motion for extension of time to file reply brief.	.1
2/03/14	VK	Downloaded and saved Order Granting Fifth Third's Motion for extension of time to file reply brief.	.1
2/28/14	VK	Downloaded and saved Fifth Third's motion for extension of pages in reply brief	.1
2/28/14	VK	Downloaded and saved Fifth Third's Reply to Plaintiffs' Response to Motion to Dismiss	.1
3/5/14	VK	Downloaded and saved order granting Fifth Third's motion for extension of pages in reply brief.	.1
3/7/14	JW	Downloaded and saved letter from Fifth Third counsel attaching notice of manual filing and exhibits along with attachments	.1
8/12/14	VK	Downloaded and saved Fifth Third's Notice of Supplemental Authority with attached authority in support of Motion to Dismiss	.1
8/13/14	VK	Downloaded and saved Plaintiffs' Notice of Supplemental Authorities (Doc. #86)	.1
8/18/14	VK	Downloaded and saved Fifth Third's response to Plaintiffs' Notice of Supplemental Authority	.1
3/30/15	VK	Downloaded and saved Order on Motion to Dismiss	.1
4/9/15	VK	Downloaded and Saved notice of hearing/status conference	.1
4/13/15	VK	Downloaded and saved unopposed motion for extension of time to respond to Complaint	.1
4/15/15	VK	Downloaded and saved notice of status conference	.1

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Date	Paralegal	<u>Description</u>	Time
4/23/15	VK	Downloaded and saved Order granting Fifth Third's Motion for Extension of Time to Answer complaint	.1
4/27/15	VK	Downloaded and saved Fifth Third's Answer	.1
6/15/15	VK	Saved letter from Fifth Third Counsel regarding discovery responses and request for confidentiality order	.1
6/16/15	VK	Downloaded and Saved discovery responses and proposed confidentiality order from Fifth Third	.1
7/8/15	VK	Calendared meet and confer	.1
7/15/15	VK	Saved letter to Fifth Third regarding discovery responses	.1
7/16/15	VK	Saved final protective order	.1
7/21/15	VK	Downloaded and Saved Joint MOTION for Protective Order by Defendant Fifth Third Bank	.1
08/7/15	VK	Saved letter from Defense counsel regarding discovery conference and position on outstanding issues	.1
8/28/15	VK	Downloaded and saved Stipulated Protective Order	.1
8/31/15	VK	Downloaded and saved Notice of Status Conference	.1
9/4/15	VK	Downloaded and saved letter from Fifth Third counsel enclosing documents responsive to discovery request	.1
9/8/15	VK	Downloaded and saved Fifth Third's notice of withdrawal by attorney Aaron Weis	.1
9/9/15	VK	Calendared 10/15/15 status conference	.1
9/23/15	AM	Saved summary of Fifth Third's production in response to discovery requests	.1

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Date	Paralegal	Description	Time
9/24/15	AM	Calendared call with co-counsel	.1
10/15/15	AM	Downloaded and saved status conference minutes	.1
11/16/15	AM	Downloaded and saved Notice of Rescheduling Status Conference.	.1
11/16/15	AM	Calendared Status Conference	.1
12/9/15	AM	Downloaded and saved letter to Judge Barrett	.1
9/26/16	AM	Calendared Telephone conference with co-counsel in preparation for call with Court	.1
9/26/16	AM	Calendared call with Court	.1
11/28/16	AM	Calendared Conference call with co-lead to discuss class size and potential damages to class members	.1
11/30/16	JW	Calendared Conference call with defense counsel to discuss settlement	.1
1/12/17	AM	Calendared Conference call with defense counsel regarding setting up conference with court	.1
1/31/17	JW	Saved demand letter to defendant	.1
2/10/17	AM	Saved letter from Fifth Third in response to our demand letter	.1
3/8/17	JW	Calendared Conference call with Fifth Third counsel	.1
3/17/17	JW	Saved final demand letter to Fifth Third	,1
3/22/17	AM	Calendared Conference call with Judge Barrett	.1
3/22/17	AM	Downloaded and saved Minute Entry from Judge Barrett	.1

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Date	Paralegal	Description	Time
3/31/17	AM	Saved mediation letters to Judge Barrett and to defense counsel	.1
4/12/17	AM	Saved Fifth Third's letter to Judge Barrett regarding mediation	.1
5/10/17	AM	Calendared conference call with co-counsel	.1
9/11/17	AM	Downloaded and saved Notice of Status Conference for September 20, 2017	.1
9/13/17	AM	Calendared 9/20/17 hearing	.1
9/20/17	AM	Downloaded and saved minute entry of status conference	.1
10/18/17	AM	Changed Flight reservations for Jason Whittemore	.1
10/30/17	AM	Downloaded and saved notice of appearance by Jim Burke	.1
11/6/17	AM	Contacted airlines about flight cancellation fees	.1
11/9/17	AM	Downloaded and saved Reviewed minute entry from mediation	.1
11/9/17	AM	Calendared conference call	.1
11/14/17	AM	Prepared email to co-counsel to coordinate a telephone conference	.1
11/14/17	AM	Calendared conference call with co-counsel counsel	.1
12/12/17	AM	Calendared conference call with co-counsel counsel	.1
12/13/17	AM	Prepared email-to counsel with conference call information	.1
5/1/18	AM	Calendared Telephone Mediation Conference	.1
5/30/19	AM	Saved letter to def counsel re: outstanding discovery	.1

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Date	Paralegal	Description	Time
6/20/19	AM	Prepared draft of Motion to Set Case Management Conference	.I
6/21/19	AM	Downloaded and saved Plaintiffs' Motion for Case Management Conference and to Lift Stay [DK 113]	í.
6/28/19	AM	Downloaded and saved Order granting Motion for hearing	.1
6/28/19	AM	Saved letter from co-counsel to Fifth -Third re: discovery	.1
7/1/19	AM	Calendared teleconference with co-counsel to prepare for case management conference	.1
7/1/19	AM	Downloaded and saved minute entry from court	.1
7/1/19	AM	Prepared draft discovery plan	.2
7/8/19	AM	Prepared email to co-counsel with Def's discovery responses	.1
7/11/19	AM	Calendared Phone conf w/ defense counsel re; joint discovery plan	.1
7/11/19	AM	Saved Plfs Second Interrogatories to Def. copy	.1
7/15/19	AM	Calendared conference call with co-counsel	.1
7/23/19	AM	Calendared Conference call with opposing counsel	.1
7/30/19	AM	Filed, Downloaded and Saved Joint Class Certification Discovery Plan [DK 115]	.1
7/31/19	AM	Downloaded and saved Minute Entry from Court	.1
8/5/19	AM	Downloaded and saved Agreed Amended Calendar Order [DK 116]	.1
8/14/19	AM	Calendared Conference w/ opposing counsel to discuss discovery	.1
8/22/19	AM	Spoke with Laskaris	.1

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Date	Paralegal	Description	Time
8/22/19	AM	Prepared email to Laskaris with	,2
8/23/19	AM	Reviewed reply email from Laskaris	.1
8/23/19	AM	Downloaded and Saved Fifth Third's Amended Responses to Interrogatories from Plaintiff's First Set of Interrogatories and Responses to Plaintiff's Second Set of Interrogatories	.1
8/23/19	AM	Fifth Third's Amended Responses to Document Request from Plaintiff's First Request for Production of Documents	.1
8/26/19	AM	Prepared Draft of Rule 26 disclosures	.2
8/29/19	AM	Bates stamped documents to serve with Rule 26 Disclosures	.3
8/29/19	AM	Calendared Conference call with defense counsel	-1
8/30/19	AM	Prepared email to all counsel serving Plaintiff's Rule 26 Disclosures	.1
8/30/19	AM	Downloaded and Saved Def's Rule 26 disclosures	.1
9/4/19	AM	Downloaded and Saved Motion for Leave to Appear Pro Hac Vice of Anna C. Haac	.1
9/6/19	AM	Downloaded and Saved NOTICE of Change of Address by Ben Barnow	.1
9/11/19	AM	Downloaded and Saved ORDER granting [117] Motion for Leave to Appear Pro Hac Vice of Anna C. Haac	.1
9/16/19	AM	Prepared a Dropbox link for Plfs Responsive Documents	1
9/18/19	AM	Calendared good faith conference call with defense counsel	.1
9/19/19	AM	Prepared email to co-counsel with Dropbox link	.1
9/19/19	AM	Pulled Bankruptcy docket for Laskaris	.1
9/26/19	AM	Prepared email to Alex Jones	.1

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Date	Paralegal	Description	Time
9/27/19	AM	Drafted decelerations for client's signatures	.1
9/27/19	AM	Prepared email to co-counsel with unsigned declarations	.1
9/27/19	AM	Downloaded and saved Plaintiff's Responses to Defendant Fifth Third Bank's First Set of Requests for Production of Documents	.1
9/27/19	AM	Downloaded and Saved Plaintiffs' Answers to Defendant Fifth Third Bank's Set of Interrogatories	.1
9/27/19	AM	Prepared email to co-counsel with signed declarations	.1
10/9/19	AM	Downloaded and saved letter from defense counsel re: Second RTP	.1
10/16/19	AM	Downloaded and saved Notice of Appearance by Dante Marinucci	.1
10/16/19	AM	Downloaded and saved NOTICE of Appearance by Sam Anthony Camardo	.1
10/16/19	AM	Downloaded and saved AMENDED ANSWER to [68] Amended Complaint	.1
10/24/19	AM	Downloaded and Saved FTP discovery docs	.1
10/24/19	AM	Prepared email to co-counsel with dropbox link to FTP discovery docs	.1
10/24/19	AM	Prepared email to defense counsel with signed declaration sheet for protective order	.1
10/29/19	AM	Downloaded and saved 10/29/19 letter from defense counsel	.1
10/29/19	AM	Downloaded and saved NOD of Lori Laskaris	.1
10/29/19	AM	Downloaded and saved NOD of Diana Horn	.1
10/29/19	AM	Downloaded and saved NOD of Danielle Laskaris	.1
10/29/19	AM	Downloaded and saved NOD of Williams Klopfenstein	.1

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Date	Paralegal	Description	Time
10/29/19	AM	Downloaded and saved NOD of Lyn Adanich	.1
10/29/19	AM	Downloaded and saved NOD of Adam MCKinney	.1
10/29/19	AM	Downloaded and saved NOD of Donald Adanich	.1
10/29/19	AM	Downloaded and saved NOD of Brian Harrison	.1
10/29/19	AM	Downloaded and saved NOD of Janet Fyouck	.1
10/30/19	AM	Prepared email to Laskaris	.1
10/30/19	AM	Reviewed reply email from Laskaris regarding	.1
10/30/19	AM	Downloaded and saved Minute Entry for proceedings held before Judge Michael R. Barrett	.1
11/5/19	AM	Calendared Conference call with co-counsel	.1
11/1/19	AM	Call with Ms. Laskaris regarding	.1
11/1/19	AM	Prepared email to Laskaris	.1
11/1/19	AM	Reviewed reply email from Laskaris	.1
11/1/19	AM	Prepared reply email to Ms. Laskaris	-,1
11/6/19	AM	Calendared Conference call with defense counsel	.1
11/12/19	AM	Downloaded and saved PIf's Amended responses to discovery	1
11/18/19	AM	Downloaded and saved amended notice of depo to d. laskaris	.1
11/18/19	AM	Downloaded and saved amended notice of depo to L. laskaris	.1

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Date	Paralegal	Description	Time
11/22/19	AM	Downloaded and saved Notice of Withdrawal of Co-Counsel James E. Burke for Fifth Third Bank	.1
11/22/19	AM	Received call from Ms. Laskaris regarding	.1
11/22/19	AM	Downloaded and saved Fifth Third's Second Amended Response to Interrogatories	.1
11/25/19	AM	Prepared email to S. Scott regarding	.1
11/25/19	AM	Reviewed reply email to S. Scott regarding	.1
11/26/19	AM	Downloaded and saved Defendant's Notice of Taking Video Deposition of Plaintiff Daniel Laskaris	.1
11/26/19	AM	Downloaded and saved Defendant's Notice of Taking Video Deposition of Plaintiff Lori Laskaris	.1
11/26/19	AM	Prepared email to Laskaris	.1
11/26/19	AM	Reviewed email from Laskaris	.1
11/26/19	AM	Prepared email to S. Scott	,1
11/26/19	AM	Prepared email to defense counsel regarding Laskaris deposition	.1
11/26/19	AM	Reviewed email to defense counsel regarding Laskaris deposition	.1
11/26/19	AM	Prepared email to Laskaris	.1
11/26/19	AM	Reviewed reply email from Laskaris regarding	.1
11/26/19	AM	Prepared reply email to Laskaris regarding	.1
11/26/19	AM	Prepared email to co-counsel	.1
12/2/19	AM	Prepared email to Laskaris	.1

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Date	Paralegal	Description	Time
12/2/19	AM	Reviewed reply email from Laskaris	-1
12/6/19	AM	Downloaded and Saved Joint Motion to Amend Agreed Calendar Order [DK 124]	.1
12/9/19	AM	Phone call with Ms. Laskeris	.1
12/9/19	AM	Researched a meeting location near client for deposition prep meeting	.2
12/9/19	AM	Emailed court reporter's office near client for deposition prep meeting	.1
12/9/19	AM	Reviewed reply email from Court reporters office	.1
12/9/19	AM	Reviewed email from co-counsel regarding dropbox for discovery documents	.1
12/10/19	AM	Prepared Reply email with Dropbox link	.1
12/10/19	AM	Reviewed email from court reporter confirming use of their location for depo prep meeting	.1
12/10/19	AM	Prepared email to clients	.1
12/11/19	AM	Prepared email to Laskaris	.1
12/11/19	AM	Scheduled conference call between Laskaris and counsel	.1
12/11/19	AM	Prepared email to Laskaris	.1
12/11/19	AM	Reviewed reply email from Laskaris	.1
12/12/19	AM	Prepared email to Laskaris	.1
12/16/19	AM	Phone call to Laskaris	,1
12/16/19	AM	Prepared email to co-counsel	.1

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Date	Paralegal	Description	Time
12/16/19	AM	Downloaded and Saved Order granting Joint Motion to Amend Agreed Calendar	.1
12/17/19	AM	Reviewed confirmation email from Court Reporter's office for depo prep	.1
12/17/19	AM	Prepared email to co-counsel	.1
12/18/19	AM	Prepared email to defense counsel confirming deposition of Laskaris	1
12/18/19	AM	Prepare deposition folder for depo of Laskaris	.2
12/18/19	AM	Received reply email from defense counsel	.1
12/18/19	AM	Saved Plfs Response letter to Fifth Third Discovery disputes	
12/19/19	AM	Reviewed email from court reporter with invoice for depo prep meeting	.1
12/20/19	AM	Saved 12.20.19 discovery follow-up letter to fifith third	-,1
12/23/19	AM	Downloaded and Saved Mtn to Appear pro hac Erich Schork	.1
12/27/19	AM	Downloaded and Saved Order granting Mtn to Appear pro hac Erich Schork	
12/30/19	AM	Calendared telephone conference with co-counsel regarding 30b6 notice and depositions	.1
1/6/20	AM	Called Vertitext reporting regarding the transcript of the 12/19/19 deposition	.1
1/6/20	AM	Researched and called court reporters in Nashville area	.2
1/6/20	AM	Reviewed email from Veritext about deposition transcript	
1/6/20	AM	Prepared email to Brian Harrison	.1
1/6/20	AM	Downloaded and saved STIPULATION of Dismissal of Plaintiff Lyn Adanich	.1

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Date	Paralegal	Description	Time
1/6/20	AM	Downloaded and saved NOTICE by Plaintiffs Donald E. Adanich	.1
1/8/20	AM	Downloaded and saved deposition transcript of Lori Laskaris	.1
1/8/20	AM	Downloaded and saved deposition transcript of Daniel Laskaris	.1
1/8/20	AM	Saved 1/8/20 letter re: discovery	.1
1/13/20	AM	Prepared email to co-counsel	,1
1/15/20	AM	Prepared email to Brian Harrison	.1
1/15/20	AM	Saved 1.15.20 letter from defense counsel regarding plaintiffs' 30(b)(6) deposition notice.	.1
1/16/20	JW	Downloaded and saved revised NOD re: Fyock	.1
1/16/20	JW	Calendared deposition of Fyock	.1
1/17/20	AM	Saved 1/17/20 letter regarding discovery deficiencies response letter	,1
1/18/20	AM	Saved revised NOD for Brian Harrison	,1
1/18/20	AM	Calendared deposition of Brian Harrison	.1
1/21/20	AM	Calendared telephone conference with co-counsel regarding discovery response letter	.1
1/21/20	AM	Saved ltr to Fifth Third re: 30b6 objections	.1
1/21/20	AM	Prepared deposition folder for Harrison Deposition	.2
1/21/20	AM	Researched and reserved flight for JW to travel to Nashville	,1
1/21/20	AM	Prepared email to co-counsel regarding depositions transcripts costs	.1

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Date	Paralegal	Description	Time
1/22/20	AM	Prepared email to Alex Davis	J.
1/23/20	AM	Reviewed reply email from Alex Davis	.2
1/23/20	AM	Prepared email to co-counsel	Л
1/23/20	AM	Prepared email to Alex Davis	.1
1/23/20	AM	Received reply email from Alex Davis	.1
1/27/20	AM	Calendared conference call with co-counsel re: demand and 30b6	.1
2/3/20	AM	Saved 5/3's letter re: discovery	.1
2/3/20	AM	Prepared email to Mr. Harrsion	.1
2/3/20	AM	Reviewed reply email from Mr. Harrison	.1
2/10/20	AM	Downloaded and Saved Amended Notice of Taking Deposition of Adma Mckinney	.1
2/10/20	AM	Calendared deposition of Adam McKinney	.I
2/10/20	AM	Downloaded and Saved discovery responses to 2 <sup>nd</sup> set of RFPs and Responses to 3 <sup>rd</sup> Set roggs	.1
2/11/20	AM	Calendared conference call with co-counsel regarding demand letter	.1
2/12/20	AM	Prepared email to co-counsel with deposition invoice for reimbursement	.1
2/20/20	AM	Downloaded and saved Reviewed MOTION for Leave to Appear Pro Hac of Enu A. Mainigi	.1
2/20/20	AM	Downloaded and saved MOTION for Leave to Appear Pro Hac of Craig D. Singer	.1
2/20/20	AM	Downloaded and saved MOTION for Leave to Appear Pro Hac of Kenneth C. Smurzynski	.1

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Date	Paralegal	Description	Time
2/20/20	AM	Downloaded and saved MOTION for Leave to Appear Pro Hac of Risha Asokan	.1
2/24/20	AM	Downloaded and saved the NOTICE of Hearing:	.1
2/24/20	AM	Downloaded and saved NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Enu A. Mainig	.1
2/24/20	AM	Downloaded and saved NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Craig D. Singer	.1
2/24/20	AM	Downloaded and saved NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Kenneth C. Smurzynski	.1
2/24/20	AM	Downloaded and saved NOTATION ORDER granting [132] Motion for Leave to Appear Pro Hac Vice of Risha Asokan	.1
2/25/20	AM	Calendared conference call with co-counsel	.1
3/3/20	AM	Received call from Laskaris Bankruptcy trustee's office	ş41
3/5/20	AM.	Saved letter from OC w/ 4th production of documents	-,1
3/5/20	AM	Saved additional production from Fifth Third	.1
3/6/20	AM	Worked on formatting mediation statement	.1
3/16/20	AM	Calendared telephone conference with co-counsel	.1
3/23/20	AM	Saved demand letter	
3/26/20	AM	Calendared telephone conference with co-counsel	
3/27/20	AM	Downloaded and saved Notice from Court re: settlement conf being changed to status conf and updated calendar	
3/27/20	AM	Saved letter to fifth third regarding status conference and effect of virus on procedure of case	
4/6/20	AM	Calendared status conference via telephone conference	

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Date	Paralegal	Description	Time
4/6/20	AM	Downloaded and saved Minute Entry for status conference	,1
4/15/20	AM	Calendared telephone conference with co-counsel to discuss class definition and other drafting issues for class certification brief	I.
4/16/20	AM	Saved additional production from Fifth Third	.1
4/16/20	AM	Saved letter from Fifth Third regarding production of documents	.1
4/18/20	AM	Calendared conference call with co-counsel	.1
4/20/20	AM	Downloaded and Saved motion for class certification	,1
4/28/20	AM	Downloaded and Saved Amended MOTION to Certify Class -	.1
5/18/20	AM	Calendared conference call with co-counsel	.1
6/3/20	AM	Calendared status conference	.1
6/3/20	JW	Downloaded and saved minute entry from the Court	,1
6/10/20	AM	Downloaded and saved Notice of Settlement Conference	.1
7/17/20	JW	Downloaded and saved defendants' motion to file under seal	.1
7/17/20	AM	Downloaded and saved response in opposition to motion for class cert and exhibits filed by Fifth Third	.1
7/21/20	AM	Downloaded and saved notice of sealed document	,1
7/21/20	AM	Downloaded and saved ORDER granting [139] Motion to File Document Under Seal	.1
7/27/20	AM	Prepared folders for Mediation and printed docs and/or put them on thumb drive	.3
7/31/20	AM	Prepared shell of joint stipulation to propose deadline for reply brief	.1

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Date	Paralegal	Description	Time
8/3/20	AM	Filed joint stipulation to propose deadline for reply brief	.1
7/31/20	AM	Downloaded and saved joint stipulation to propose deadline for reply brief	.1
8/3/20	AM	Calendared conference call with co-counsel	
8/6/20	AM	Downloaded and saved Order granting Joint stipulation to extend deadline for plf to file Reply in support of Class Certification	.1
8/7/20	AM	Downloaded and saved minute entry from court	.1
8/10/20	JW	Calendared conference call with co-counsel	.1
8/11/20	JW	Calendared status conference with Court regarding mediation.	.1
8/11/20	JW	Downloaded and saved minute entry from court	1
8/14/20	AM	Researched contact information for bankruptcy trustee	
9/2/20	AM	Downloaded and saved reply in support of class certification	
9/23/20	AM	Downloaded and saved notice of status conference	
9/23/20	AM	Calendared status conference	
9/23/20	AM	Calendared conference call with co-counsel	
9/24/20	AM	Downloaded and saved MOTION for Leave to File Sur-reply in Opposition to Plaintiffs' Motion for Class Certification	
9/24/20	AM	Downloaded and saved Minute Entry for proceedings	
9/28/20	AM	Downloaded and saved opposition to Fifth Third's motion to file sur-reply	
9/30/20	AM	Downloaded and saved Minute Entry for settlement conference	

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Date	Paralegal	Description	Time
2/1/21	AM	Calendared telephone conference with co-counsel	.1
2/5/21	AM	Downloaded and saved order granting defendant's motion to file sur-reply	.1
2/5/21	AM	Downloaded and saved Fifth Third's Sur-Reply in opposition to class certification	.1
2/23/21	AM	Downloaded and saved notice of withdrawal of counsel Risha Asokan	.1
3/26/21	AM	Downloaded and saved court's order granting motion for class certification	.1
3/26/21	AM	Calendared telephone conference with co-counsel regarding motion for class certification	.1
3/31/21	AM	Prepared email to Laskaris	.1
3/31/21	AM	Reviewed reply email from Laskaris	.1
3/31/21	AM	Calendared conference call with co-counsel	.1
4/1/21	AM	Prepared reply email to Lasakris	.1
4/6/21	AM	Reviewed email from Laskaris	.1
4/6/21	AM	Downloaded and saved Motion to appear Pro hac -Amy McKinley	.1
4/8/21	AM	Downloaded and saved Notice of Withdrawal of Co-Counsel Erich P. Schork [DK 152]	,1
4/15/21	AM	Downloaded and saved order granting pro hac motion for Amy McKinlay	.1
4/21/21	AM	Downloaded and saved Plaintiff's Fourth Set of Interrogatories to Defendant	.1
4/21/21	AM	Downloaded and saved Plaintiff's Third Request for Production to Defendant	,1
4/23/21	AM	Phone call with Lori Laskaris	.1

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Date	Paralegal	Description	Time
4/23/21	AM	Reviewed email from Laori Laskairs	,1
4/23/21	AM	Prepared reply email to Lori Laskaris	.1
4/23/21	AM	Reviewed 40 emails for Lori Laskaris and downloaded statements	.5
4/23/21	AM	Prepared email to co-counsel	.1
4/26/21	AM	Calendared telephone conference with defense counsel regarding notice to class	.1
5/20/21	AM	Downladed and saved Fifth Third's responses to Plaintiffs' recent set of discovery requests.	.1
6/3/21	AM	Calendared conference call with co-counsel in advance of call with Fifth Third counsel	.1
6/3/21	AM	Calendared conference call with Fifth Third counsel regarding notice plan and discovery order	.1
6/8/21	AM	Downloaded and saved Notice of Substitution of Counsel- Dennis R Lansdowne	,1
6/15/21	AM	Prepared email to Adam McKinney	.1
6/14/21	AM	Prepared email to Janet Fyock	.1
6/15/21	AM	Prepared email to Laskaris	.1
6/15/21	AM	Prepared email to Harrison	,1
6/16/21	AM	Reviewed reply email from Ms. Laskaris	.1
6/22/21	AM	Downloaded and saved Joint MOTION to Set Supplemental Calendar Order by Plaintiffs	.1
6/30/21	AM	Downloaded and saved Consent MOTION To Approve Plaintiff's Proposed Plan of Notice by Plaintiffs	1
7/14/21	AM	Downloaded and saved order granting plaintiff's motion to approve notice plan	.1

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Date	Paralegal	Description	Time
7/14/21	AM	Downloaded and saved order setting case management deadlines	.1
7/22/21	AM	Calendered new deadlines	.3
8/13/21	AM	Calendered conference call	.1
8/13/21	AM	Downloaded and saved fifth thirds second set of Interrogatories	.1
8/13/21	AM	Downloaded and saved Fifth Third second set of Request for Production	.1
8/16/21	AM	Saved 8/16/21 good faith letter to Fifth Third	.1
8/23/21	AM	Prepared service email to defense counsel of Plfs 4th RFP to Def and fifth roggs	.1
8/24/21	AM	Received reply email from co-counsel requesting word versions of Plfs 4th RFP to Def and fifth roggs	.1
8/24/21	AM	Prepared email to co-counsel with word versions of of Plfs 4th RFP to Def and fifth roggs	.1
9/2/21	AM	Saved Fifth-Thrid's 9/2/21 letter and discovery	.1
9/3/21	AM	Calendared Telephone conference re discovery requests	.1
9/6/21	AM	Reviewed email from Laskaris	.1
9/3/21	AM	Reviewed email from Harrison	.1
9/3/21	AM	Saved Plaintiffs' Notice of 30(b)(6) Deposition of Fifth Third	.1
9/8/21	AM	Calendared call with Brian Harrison call	.1
9/8/21	AM	Calendared conference call regarding	.1
9/13/21	AM	Calendared conference call with co-counsel	.1

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Date	Paralegal	Description	Time
9/13/21	AM	Prepared email to Laskaris	.1
9/13/21	AM	Reviewed reply email from Laskaris	.1
9/13/21	AM	Calendared zoom conference with Laskaris and sent them link	,1
9/13/21	AM	Downladed and saved Plaintiff Adam McKinney, Lori Laskaris, Daniel Laskaris, Janet Fyock, and Brian Harrison's Responses to Fifth Third's Second Set of Interrogatories and Second Set of Requests for Production of Documents.	.1
9/13/21	AM	Saved 9/13/21 letter from defense counsel	.1
9/14/21	AM	Prepared email to Harrison with Plfs responses to send interrogatories	.1
9/14/21	AM	Sent verification to Harrison via docusign	.1
9/14/21	AM	Prepared email to Lori Laskaris	.1
9/14/21	AM	Prepared email to Daniel Laskaris	.1
9/14/21	AM	Prepared email to Fyock	.1
9/14/21	AM	Sent verification to Daniel Laskaris ia docusign	.1
9/14/21	AM	Sent verification to Lori Laskaris via docusign	.1
9/14/21	AM	Sent verification to Fyock via docusign	.1
9/15/21	AM	Downloaded and saved Fifth Third's Amended responses to discovery	,1
9/16/21	AM	Prepared email to co-counsel with signed verifications	
9/16/21	AM	Telephone call to Ms. Laskaris requesting documents	1 3
9/16/21	AM	Reviewed email from Lori Laskaris	1

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Date	Paralegal	Description	Time
9/22/21	AM	Downloaded and saved (1) Fifth Third's responses and objections to the 4th set of RFPs, (2) Fifth Third's responses and objections to the 5th set of ROGs, (3) one amended response to the 3rd set of RFPs, and (4) a letter regarding your 30(b)(6) notice.	.1
9/22/21	AM	Downloaded and saved final of voluntary dismissal of Klopfenstein and Horn	.1
9/30/21	AM	Downloaded and saved defendant's motion for class action trial plan	.1
10/1/21	AM	Drafted shell of Subpoena of Schedule documents	.1
10/4/21	AM	Calendared conference call with co-counsel	.1
10/7/21	AM	Formatted subpoena to Oliver Wyman	.1
10/7/21	AM	Prepared email to process server with subpoena	.1
10/7/21	AM	Prepared email to court reporter with subpoena	.1
10/7/21	AM	Prepared email to defense counsel with subpoena	.1
10/7/21	AM	Received reply email from court reporter	.1
10/8/21	AM	Received reply email from process server	.1
10/12/21	AM	Pulled bankruptcy dockets for Laskaris	.2
10/13/21	AM	Received reply email from process server with Affidavit	.1
10/19/21	AM	Saved letter from counsel for Oliver Wyman	.1
10/21/21	JW	Downloaded and saved response in opposition to defendant's motion for bifurcated trial plan	.2
10/22/21	AM	Prepared email to counsel of Oliver Wyman for dates for conference call	.1
10/24/21	AM	Saved letter from Fifth Third with password to access 8 <sup>th</sup> production of documents	.1

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Date	Paralegal	Description	Time
10/25/21	AM	Saved 10.25.21 letter from Defense counsel	7.1
10/28/21	AM	Prepared email to counsel of Oliver Wyman for dates for conference call	.2
10/29/21	AM	Prepared 3 <sup>rd</sup> email to counsel of Oliver Wyman for dates for conference call	.1
11/1/21	AM	Calendered conference call with Fifth Third counsel regarding discovery disputes	.1
11/1/21	AM	Prepared email to Harrison	.1
11/1/21	AM	Prepared email to Laskaris	.1
11/1/21	AM	Saved Revised NOD of Fifth third corp rep	.1
11/2/21	AM	Received reply email from Mr. Harrison	i.i
11/2/21	AM	Calendared depo of 5/3 corp rep	.1
11/2/21	AM	Saved letter regarding 9th production from defendant	.1
11/2/21	AM	Prepared email to counsel for Oliver Wyman regarding telephone conf.	.1
11/2/21	AM	Prepared email to counsel for Oliver Wyman regarding telephone conf.	.1
11/16/21	AM	Saved letter re 10th production from Fifth Third	.1
11/16/21	AM	Saved Fifth Third 10th production	.1
11/17/21	AM	Saved letter from defense counsel regarding deficient discovery responses from plaintiffs	.1
11/18/21	AM	Downloaded transcript of Fifth Third corporate rep	.1
11/29/21	AM	Downladed and saved documents produced by Oliver Wyman	.1

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Date	Paralegal	Description	Time
11/29/21	AM	Saved letter from defense counsel regarding 12th production of documents	.1
11/30/21	AM	Drafted subpoena to Fistserv Carreker	.1
12/6/21	AM	Prepared email to process server with subpoena	.1
12/6/21	AM	Prepared email to defense counsel with subpoena	.1
12/7/21	AM	Received reply email to process server with subpoena	.1
12/7/21	AM	Prepared shell for new demand	.1
12/7/21	AM	Prepared shell of Supplemental Answers to Interrogatories	.2
12/13/21	AM	Prepared email to Laskaris	.1
12/23/21	AM	Received reply email to Laskaris	.1
12/13/21	AM	Prepared email for Fyock	.1
12/13/21	AM	Sent Verification to Lori Laskaris via Docusign	.1
12/13/21	AM	Sent Verification to Daniel Laskaris via Docusign	.1
12/13/21	AM	Prepared email for Harrison	.1
12/8/21	AM	Saved letter from Fifth Third regarding 14th production of documents	.1
12/13/21	AM	Saved letter from defense counsel re 15 production by fifth third	.1
12/14/21	AM	Calendared conference with co-counsel regarding discovery	.1
12/14/21	AM	Downloaded and Saved Motion for Leave to File Amended Answer	.1

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Date	Paralegal	Description	Time
12/15/21	AM	Sent Verification to Fyock via Docusign	.1
12/15/21	AM	Prepared email to process server with Subpoena to Carreker	.1
12/15/21	AM	Prepared email to defense counsel with subpoena	.1
12/15/21	AM	Reviewed reply email from process server	.1
12/15/21	AM	Prepared email about Fyock unsigned verification form	.1
12/15/21	AM	Phone call with Harrison	.2
12/15/21	AM	Bates stamped and put together additional documents that are being produced	.3
12/15/21	AM	Saved letter regarding 16th production by Fifth Third	.1
12/16/21	AM	Saved transcript of Mendelson deposition	.1
12/17/21	AM	Prepared email to co-counsel	.1
12/17/21	AM	Prepared email to counsel serving Plfs Supplemental Responses to Fifth Third RFP and production	.1
12/17/21	AM	Disco training	1,0
12/20/21	AM	Prepared email to Laskaris	.1
12/20/21	AM	Prepared verification form for Adam McKinney and emailed it to co-counsel	.1
12/20/21	AM	Received reply email from Laskaris	.1
12/20/21	AM	Prepared email to Harrison w	.1
12/20/21	AM	Reviewed account set up email from disco and set up login information	.2

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Date	Paralegal	Description	Time
12/20/21	AM	Prepared email to Disco representative	.1
12/21/21	AM	Reviewed reply email from process server regarding address for Carreker Corp	.1
12/21/21	AM	Prepared email to Process server	.1
12/21/21	AM	Reviewed reply email from Brain Harrison	.1
12/21/21	AM	Received reply email from Process Server about address.	.1
12/21/21	AM	Researched new location for deposition in WI and Edited subpoena with updated address for location of deposition	.3
12/22/21	AM	Prepared follow-up email regarding	.1
12/22/21	AM	Prepared follow-up email regarding	.1
12/22/21	AM	Reviewed reply email regarding Mckinney	.1
12/22/21	AM	Reviewed reply email regarding Fyock	.1
12/22/21	AM	Saved all verification froms and attached to Plfs Amended Answers to Fifth Third interrogatories and Prepared service email to counsel	.2
12/27/21	AM	Reviewed email from co-counsel with sharefile link	.1
12/29/21	AM	Calendared conference call with counsel for Fiserve	.1
1/3/22	AM	Prepared email to counsel for Flserve re: conf call	.1
1/5/22	AM	Prepared second email to counsel for Flserve re: conf call	.1
1/5/22	AM	Reviewed reply email and calendared new conference call date	.1
1/5/22	AM	Reviewed invoice from process server for service of subpoena on Carreker Corp	,1

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Date	Paralegal	<u>Description</u>	<u>Time</u>
1/5/22	AM	Prepared email to counsel for Fiserve with subpoena to Carreker	.1
1/19/22	AM	Downloaded and saved final consent motion to extend expert disclosure deadlines	.1
1/20/22	AM	Calendered conference call with Co-counsel	.1
1/28/22	AM	Prepared email to counsel for Fiserve re: phn conf	.1
1/28/22	AM	Reviewed reply email from counsel for Fiserve re: phn conf	.1
1/28/22	AM	Prepared response email to counsel for Fiserve re: phn conf	.1
1/28/22	AM	Reviewed reply email from counsel for Fiserve re: phn conf	.1
1/28/22	AM	Calendared phn conf w/ counsel for Fiserve	.1
2/16/22	AM	Downloaded and saved notice of telephone status conference	.1
2/16/22	AM	calendared status conference	.1
2/18/22	AM	Calendared call with expert Simkovic	.1
2/18/22	AM	Calendared conference with co-counsel	.1
2/21/22	AM	Calendared telephone conference with opposing counsel regarding status conference	.3
2/22/22	AM	Downloaded and saved minute entry on status conference	.1
2/22/22	AM	Downloaded and saved order on leave to file amended answer by 4/1	.1
2/23/22	AM	Fixed formatting on demand letter	.1
2/23/22	AM	Downloaded and saved order on leave to file amended answer by 3/1	.1

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Date	Paralegal	<u>Description</u>	Time
2/23/22	AM	Downloaded and saved notice to reset deadlines from Court	.1
2/23/22	AM	Downloaded and saved Fifth Third's amended answer	.1
2/28/22	AM	Calendared conference call with Fifth Third counsel regarding depositions	.1
2/28/22	AM	Calendared conference call with co-counsel to decide on Fifth Third proposal regarding depositions	.5
3/2/22	AM	Downloaded and saved notice of withdrawal from attorney Penny Handy	.1
3/3/22	AM	Calenderered zoom conference with expert Pat Oliver	.1
3/4/22	AM	Downloaded and saved consent motion to extend discovery deadlines	.1
3/8/22	AM	Submitted February Disco invoice to bookkeeper for payment	.1
3/9/22	AM	Submitted March Disco invoice to bookkeeper for payment	.1
3/9/22	AM	Submitted Janaury Disco invoice to bookkeeper for payment	.1
3/9/22	AM	Downloaded and saved Def's Amended response to Rog 11	.1
3/15/22	AM	Downloaded and saved notice of withdrawal of counsel by attorney Johnson	.1
3/15/22	AM	Downloaded and saved order denying joint motion to set supplemental calendar as moot	.1
3/15/22	AM	Downloaded and saved order granting motion for extension of time	.1
4/1/22	AM	Submitted Invoice for service on Bruce Howard to bookkeeper for payment	.1
4/8/22	AM	Submitted April Disco invoice to bookkeeper for payment	.1
4/11/22	AM	Downloaded and saved notices of deposition for Mark Earhardt, Thomas Carpenter and Thomas Kappes	.3

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Date	Paralegal	Description	Time
4/11/22	AM	Downloaded and saved Dia Rasinau motion to appear pro hac	.1
4/12/22	AM	Downloaded and saved order granting motion to appear pro hac from Dia	.1
4/18/22	AM	Downloaded and saved consent motion for extension of time to file answer	.1
4/20/22	AM	Calendared conference call w/ Defense counsel	.1
4/20/22	AM	Downloaded and saved order deeming answer timely	.1
4/21/22	AM	Saved letter form defense counsel regarding 25th production of documents	.1
4/22/22	AM	Downloaded and saved MOTION for Partial Summary Judgment on the Breach of Contract Claim	.1
4/22/22	AM	Dowloaded and saved Consent MOTION to Seal Exhibits 2, 4, 6, 8, and 12 to Plaintiffs' Memorandum	.1
4/22/22	AM	Calendared deposition of Kappas	.1
4/25/22	AM	Prepared email to court reporter requesting link for deposition	.1
4/25/22	AM	Calendared depositions of Carpenter and Erhardt	.1
4/25/22	AM	Downloaded and saved Clerk's Notice of Non-Compliance Local Rule 5.1 (c):	.1
4/26/22	AM	Downloaded and saved MOTION for Partial Summary Judgment on the Breach of Contract Claim	.1
4/26/22	AM	Downloaded and saved notice of change of address for defense counsel	.1
4/26/22	AM	Prepared email serving amended notice of deposition of Tom Carpenter	.1
4/27/22	AM	Prepared email serving amended notice of taking Bruce Howard Deposition	.1
4/27/22	AM	Prepared email to court reporter requesting name of court repeater and videographer	.1

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Date	Paralegal	Description	Time
4/27/22	AM	Reviewed reply email from court reporter with names of court repeater and videographer	.1
4/27/22	AM	Prepared email to defense counsel w/ names of court repeater and videographer	.1
4/27/22	AM	Prepared email to counsel with exhibits for Carpenter depo	.2
4/27/22	- AM -	Prepared email to counsel with link Carpenter depo	1
4/27/22	AM	Prepared email to defense counsel regarding link for Carpenter depo	.1
4/28/22	AM	Saved 4.28.22 Fifth Third Discovery letter	:1
4/28/22	AM	Prepared email to counsel with additional Carpenter depo exhibits	.1
4/28/22	AM	Prepared email to counsel with corrected Exhibit 16 for Carpernter depo	.1
5/3/22	AM	Downloaded and saved Fifth Third cross notice of Howard deposition	.1
5/3/22	AM	Saved 5/3/22 letter 5/3 Response to Plfs Privilege log	.1
5/6/22	AM	Downloaded and saved steven Pryser motion to appear pro hac vice	.1
5/9/22	AM	Downloaded and saved Order granting pro hac vice motion	.1
5/12/22	AM	Downloaded and saved notice of status conference	.1
5/17/22	AM	Downloaded and saved minute entry from court regarding case management	.1
5/18/22	AM	Downloaded Howard transcript	.1
5/19/22	AM	Prepared email to court reporter requesting Carpenter transcript	.1
5/19/22	AM	Reviewed reply email from Court Reporter	.1

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Date	Paralegal	Description	Time
5/19/22	AM	Downloaded and saved Carpenter transcript	.1
5/20/22	AM	Downloaded and saved notice of hearing	.1
5/20/22	AM	Calendared case management conference	.2
5/20/22	AM	Downloaded and saved minutes entry from case management	.1
5/20/22	AM	Downloaded and saved order granting motion to seal	.1
5/20/22	AM	Prepared email to co-counsel	1.1
5/20/22	AM	Downloaded and saved statistical entery	1
5/20/22	AM	Downloaded and saved notice of Redacted due to sealed restriction.	
5/25/22	AM	Downloaded and saved Grice expert report	,)
5/25/22	AM	Downloaded and saved Proof of Service of Plfs Expert Reports	1
5/27/22	AM	Downloaded and saved Joint MOTION to Amend/Correct [168] Order on Motion for Extension of Time	.1
5/27/22	AM	Calendared conference call regarding rebuttal experts	.1
5/31/22	AM	Downloaded and saved order granting joint motion for briefing schedule	.1
6/2/22	AM	Calendared Conference call with Simkovic regarding rebuttal	.1
6/8/22	AM	Prepared email to co-counsel with executed engagement eltter	,1
6/8/22	AM	Downloaded and saved notice from court that mail was returned undeliverable	l a
6/15/22	AM	Submitted Mayl Disco invoice to bookkeeper for payment	1

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<u>Date</u>	Paralegal	Description	Time
6/21/22	AM	Set up Zoom link and prepared email to co-counsel with Zoom information	.1
6/22/22	AM	Prepared email to Simkovic with draft of Expert rebuttal report	.1
6/22/22	AM	Reviewed reply email from Simkovic with final expert rebuttal report	.1
6/24/22	AM	Prepared email to co-counsel with Simkovic with final expert rebuttal report	.1
6/22/22	AM	Calendared telephone conference with Simkovic	.2
6/23/22	AM	Calendared Zoom conference with Simkovic	.1
6/29/22	AM	Downloaded and saved motion for leave to appear pro hac by Pellegrino	.1
6/30/22	AM	Downloaded and saved granting pro hac motion from Pellegrino	.1
7/5/22	AM	Calendared Call regarding expert assignments for deposition	.1
7/13/22	AM	Reviewed Def's Notice of Plfs Experts depositions	.1
7/25/22	AM	Downloaded and saved notice of substitution of counsel for William Hopkins	.1
7/27/22	AM	Downloaded and saved notice of Trail being set	.1
7/29/22	AM	Calendared Mock cross to prepare Simkovic	.1
8/8/22	AM	Downloaded and saved Grice transcript	.1
8/9/22	AM	Calendared final prep session of Simkovic	.1
8/11/22	AM	Calendared attend Simkovic's deposition	.1
8/19/22	AM	Downloaded and saved Supplemental MOTION for Summary Judgment	.1

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<u>Date</u>	Paralegal	Description	Time
8/19/22	AM	Downloaded and saved MOTION for Summary Judgment on Breach of Contract Clai	.1
8/22/22	AM	Calendared conference call with co-counsel	.1
10/3/22	AM	Downloaded and saved RESPONSE in Opposition re [185] Supplemental MOTION for Summary Judgment	.1
10/3/22	AM	Downloaded and saved RESPONSE in Opposition re [186] MOTION for Summary Judgment <i>on</i>	.1
10/4/22	AM	Downloaded and saved depo transcripts of experts	.1
10/5/22	AM	Calendared telephone conference with co-counsel	.1
10/21/22	AM	Calendared conference re reply to summary judgment	.1
11/2/22	AM	Downloaded and saved reply brief	.1
11/2/22	AM	Downloaded and saved reply brief exhibits	.1
11/30/22	AM	Downloaded and saved Notice of Change of Address	.1
12/22/22	AM	Calendared Meeting to discuss trial preparation and focus group	.1
12/23/22	AM	Downloaded and saved demand letter	.1
1/5/22	AM	Downloaded and saved letter from defense counsel regarding settlement demand response	.1
1/6/23	AM	Calendared conf re: focus team and pre trials motion in limines	.1
1/13/23	AM	Calendared call regarding scheduling	1.0
1/13/23	AM	Saved 1/13/23 letter re: Plfs Confidential Settlement Demand	.1
1/18/23	AM	review notice of case management conference	.1

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Date	Paralegal	Description	Time
1/19/23	AM	Calendared conference call in advance of CMC	.4
1/19/23	AM	Calendared CMC	.3
1/19/23	AM	Downloaded and saved minute entry from CMC	,1
1/23/23	AM	Telephone call with Laskaris	.1
1/23/23	AM	Prepared email about Fyock availability for trial	.1
1/25/23	AM	Prepared email to Laskaris	.1
1/25/23	AM	Reviewed reply email from Laskaris	.1
1/25/23	AM	Calendared telephone conference w/ Laksaris	.1
2/3/23	AM	Submitted Flight confirmation receipts to bookkeeper for reimbursement	Л
2/6/23	AM	Downloaded and saved order by judge Barrett on similar motion to dismiss against fifth third	.1
2/9/23	AM	Downloaded and saved Notice of Withdrawal of Counsel Dia Rasinariu	А
2/9/23	AM	Prepared email to Trial exhibits company about making exhibit	.1
2/9/23	AM	Received reply email from Trial exhibits company about making exhibit	.1
2/9/23	AM	Submitted hotel confirmation receipts to bookkeeper for reimbursement	.1
2/9/23	AM	Prepared email to Trial exhibits company about where to mail exhibit	.1
2/9/23	AM	Phone call w/ Trial exhibits company about making exhibit	.2
2/10/23	AM	Prepared email to Trial exhibits company about board	.1

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Date	Paralegal	Description	Time
2/10/23	AM	Reviewed reply email from Trial exhibits company	.1
2/10/23	AM	Prepared reply email to Trial exhibits company about board	.1
2/10/23	AM	Reviewed email from Trail exhibit company with proof	.1
2/10/23	AM	Prepared reply email with edit to Proof	.1
2/10/23	AM	Reviewed email from Trail exhibit company with final proof	.1
2/10/23	AM	Prepared email email to Trial exhibit company approving final proof	.1
2/13/13	AM	Prepared Dropbbox link to depo excperts and prepared email to co- counsel with link	.2
2/13/23	AM	Prepared email to co-counsel about issues with opening Zip-file	.1
2/14/23	AM	Reviewed reply email from Trial Exhibits company confirming boards were delivered	.1
2/16/23	AM	Submitted rental car receipts to Bookkeeper for reimbursement	.1
2/22/23	AM	Reviewed email with trial exhibits accompany invoice and submitted to bookkeeper for payment	.1
2/22/23	AM	Downloaded and saved motion to limine to exclude grice and green	.1
2/22/23	AM	Downloaded and saved motion to exclude walker	.1
2/22/23	AM	Downloaded and saved motion to exclude oliver and Simkovic	.1
2/27/23	AM	Prepared shell of Final Pre-trail Order	.1
2/28/23	AM	Downloaded and saved updated Exhibits folder	.1
2/28/23	AM	Began preparation of Exhibit List	.4

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Date	Paralegal	Description	Time
2/28/23	AM	Downloaded and saved MOTION for Leave to Appear Pro Hac Vice	.1
3/1/23	AM	Downloaded and saved Order on MOTION for Leave to Appear Pro Hac Vice	.1
3/2/23	AM	Began preparation of Exhibit List as per Judge Barrett's preferences	.3
3/2/23	AM	Pulled documents from Disco for Exhibits	1.0
3/2/23	AM	Prepared Dropbox link for exhibits and emailed it to Mr. Whittemore	.2
3/3/23	AM	Began preparation of Witness List	.3
3/3/23	AM	Worked on pulling additional documents for exhibits	.3
3/6/23	AM	Edited Exhibit list	.2
3/5/23	AM	Continued working on pulling documents for Exhibits	.5
3/6/23	AM	Continued working on pulling documents for Exhibits	2.0
3/6/23	AM	Calendared telephone conference regarding trial strategy	1
3/6/23	AM	Updated Dropbox link with Exhibits	.2
3/8/23	AM	Downloaded and saved RESPONSE in Opposition re [194] MOTION to Exclude Certain Expert Testimony of Dr. Jonathan Walker	.1
3/8/23	AM	Downloaded and saved RESPONSE in Opposition re [195] MOTION to Exclude the Expert Opinions and Testimony of Attorneys M. Patricia Oliver and Michael Simkov	.1
3/8/23	AM	RESPONSE in Opposition re [198] MOTION in Limine to Strike/Exclude the Testimony of Defendant's Experts Charles Grice and Joseph Green f	-,1
3/10/23	AM	Worked on editing exhibits in Dropbox link	1.0

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Date	Paralegal	Description	Time
3/10/23	AM	Prepared email to counsel with Plaintiff's Exhibit list and Dropbox link to Exhibtis	.1
3/10/23	AM	Prepared email to co-counsel requesting exhibit list updates	.1
3/10/23	AM	Downloaded and saved initial exhibit list of fifth third	.1
3/17/23	AM	Began preparation of draft joint pretrial statement	.1
3/21/23	AM	Put together Plaintiff's Trial Exhibits Folder and Fifth Third Trail Exhibit Fodlers	.2
3/21/23	AM	Calendared call with Fifth Third	.1
3/22/23	AM	Corrected bates numbers on an Exhibit	.1
3/22/23	AM	Began preparation of amended exhibit list	.2
3/29/23	AM	Downloaded and saved Order on motion for summary judgment	.1

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# EXHIBIT 10

#### Wagner, McLaughlin & Whittemore, P.A. Costs- In Re: Fifth Third Litigation

Date	Received From/Paid To	Explanation	Disbs
Oct 22/2012	The Florida Bar	Ad Review - Fifth Third Bank	150.00
Dec 20/2012	West Payment Center	Lexis/Westlaw Lexis Research 11/01/12 to 11/30/12 re: FifthThird Bank	63.55
Jan 14/2013	West Payment Center	Lexis/Westlaw Research 12/01/12to 12/31/12	154.46
Feb 12/2013	Sheriff	Sheriff of Leon County for Service of Process	40.00
Feb 20/2013	PACER	PACER Court Electronic Records 10/01/12 to 12/31/12	10.30
Mar 14/2013	3 VISA	Filing Fee paid to S.D. of Florida by VISA on 2/12/13	350.00
Apr 25/2013	PACER	Public Access to Court Electronic Records 01/01/13 to3/31/13	1.00
May 15/201	3 Clerk, Florida Supreme Court	Clerk, Florida Supreme Court - Certificate of Good Standing for Kevin McLaughlin & Jason Whittemore	2.00
May 24/201	Schachter Hendy and Johnson, P.S.C.	Reimbursement for Pro Hac Vice fee for Kevin McLaughlin and Jason Whittemore	400.00
May 28/201	3 Federal Express	Federal Express Inv# 2-279-24205	31.02
Jun 4/2013	Federal Express	Federal Express Inv# 2-286-75778; fifth-third	20.71
Jul 18/2013	West Payment Center	Lexis/Westlaw Research 06/01/2013 to 06/30/2013	85.10
Jul 19/2013	Whittemore Jason	Reimbursement to Jason Whittemore for travel expensesto Cincinnati for status conference on 7/12/13	293.15
Jul 19/2013	PACER	Public Access to Court Electronic Records 04/01/2013 to 06/30/2013	6.40
Jul 31/2013	VISA	Delta airfare to Cincinnati forstatus conference on 7/12/13	570.70
Feb 4/2014	PACER	Public Access to Court Electronic Records 10/01/2013 to 12/31/2013	0.30
Jan 20/2016	PACER Service Center	Public Access to Court Electronic Records 10/01/15 to12/31/15	1.00
Nov 2/2017	VISA	American Airlines Airfare re: travel to Cincinnati for Jason Whittemore and Kevin McLaughlin on 11/08/2017	230.60
Nov 9/2017	Whittemore Jason	Reimbursement to Jason Whittemore for Rental Car in Ohio for mediation on 11/08 to11/09/2017	67.68
Dec 12/2017	VISA	Delta Air for Jason Whittamore's 11/09/17 travel from Ohio to Tampa for Mediation	556.80
Feb 20/2018	PACER Service Center	Public Access to Court Records 10/01/2017 to 12/31/2017	2.40
Mar 23/2018	3 Whittemore Jason	Reimbursement to Jason Whittemore for travel to Ohio for mediation on 11/08/2017 to11/09/2017	455.65
Aug 28/2018	PACER Service Center	Access to Court Electronis REocirds Acct# 23683387	2.30
Aug 2/2019	PACER Service Center	Public Access to Court Records 04/01/2019 to 06/30/219	2.30
Dec 19/2019	Parliamentary Reporting, Inc.	Court Reporter	180.00
Jan 24/2020	Whittemore Jason	reimbursement to Jason Whittemore for parking and Uber in Nashville, TN re: depo prep of Mr. Harrison on 1/23/2020	67.79
Feb 11/2020	Expense Recovery	Telephone Expense Conference call on 12/16/2019	74.05
Feb 11/2020	Veritext LLC	Veritext LLC Midwest Region fortranscript services re: Daniel Laskaris and Lori Laskaris on12/19/2019	1094.20
Feb 13/2020	VISA	Southwest Airlines for travel to Nashville, TN on 1/23/2020 re: depo of Mr. Harrison	290.96
Feb 25/2020	Whittemore Jason	Reimbursement to Jason Whittemore for Travel expensesin Nashville, TN for depo of Brian Harrison on 2/4/2020	226.22
Feb 25/2020	Expense Recovery	Delta Airfare to and from Ohio on 3/17 -3/18/2020	355.60
Feb 25/2020	Spangenberg, Shibley & Liber LLP	Costs Reimbursement for Veritext INv# MW4127947	-1094.20
Mar 16/2020	) VISA	Southwest Airlines for airfare to/from Nashville, TN on 2/4/2020 to 2/5/2020	532.96
Mar 16/2020	) VISA	Hyatt hotel Nashville, TN 2/4/2020 -2/5/2020 for Jason Whittemore to attend deposition of Brian Harrison	305.21
Sep 17/2020	LexisNexis Risk Solutions	Lexis/Westlaw Legal Research 8/01/2020 to 8/31/2020	10.82
Nov 10/2021	. Wagner Karen	Wagner & Wagner Investigations and Process Service - Oliver Wyman, Columbus, Ohio	140.00
Jan 18/2022	Wagner Karen	Wagner & Wagner Investigations and Process Service - serve Fiserv, Inc. and Witness Fee check \$40.00	140.00
Mar 3/2022	Wagner Karen	Wagner & Wagner Investigations and Process Service - Carreker Corporation	200.00
Mar 3/2022	Wagner Karen	Wagner & Wagner Investigations and Process Service - Carreker Corporation Witness Fee Check	40.00
Mar 9/2022	CS Disco, Inc.	CS Disco, Inc.	173.14
Mar 9/2022	CS Disco, Inc.	CS Disco, Inc.	522.33
Mar 10/2022	2 CS Disco, Inc.	CS Disco, Inc.	831.87

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	Capital Process Services, Inc. CS Disco, Inc. CS Disco, Inc.	Capital Process Services, Inc. for Service of Process (Pay 1/3 of \$381.35) CS Disco, Inc. CS Disco, Inc. Replace lost check number 122666	127.12 235.78 235.78
May 9/2022	CS Disco, Inc.	CS Disco, Inc. Inv# 173143	277.80
Jun 16/2022	CS Disco, Inc.	CS Disco, Inc. Replace lost check number 122703	277.80
Jul 7/2022 Jul 11/2022	CS Disco, Inc. CS Disco, Inc.	CS Disco, Inc. Inv# 181399 CS Disco, Inc. Inv# 185071	194.29 173.54
Aug 8/2022	CS Disco, Inc.	CS Disco, Inc. Inv# 189128	173.60
Sep 8/2022	VISA	Orange County Civil Docs	9.74
	CS Disco, Inc.	CS Disco, Inc. Inv# 193316	173.54
Oct 18/2022	CS Disco, Inc.	CS Disco, Inc. Inv# 197595	173.54
Oct 25/2022	PACER Service Center	Public Access to Court Records	119.20
Nov 8/2022	CS Disco, Inc.	CS Disco, Inc. Inv# 201993	173.54
Jan 13/2023	CS Disco, Inc.	CS Disco, Inc. Inv# 206489	173.54
Jan 13/2023	CS Disco, Inc.	CS Disco, Inc. Inv# 211170	173.54

Total \$10,280.72

# EXHIBIT 11

#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

In re: Fifth Third Early Access Cash Advance Litigation Case No. 1:12-cv-00851-MRB

Judge Michael R. Barrett

#### <u>DECLARATION OF BEN BARNOW IN SUPPORT OF</u> <u>PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS</u>

I, Ben Barnow, hereby declare as follows:

- 1. I am an attorney admitted to practice law in the State of Illinois and the State of New York. I am the President of Barnow and Associates, P.C. ("Barnow and Associates"). This declaration is made in support of Plaintiffs' Motion for Attorneys' Fees and Costs. I have personal knowledge of all the facts stated herein based on my active participation in the prosecution of the above-captioned consolidated matter and my firm's business records, and, if called as a witness, I could and would competently testify thereto.
- 2. I include my firm resume here at Exhibit A, which demonstrates my firm's extensive experience in complex class action lawsuits.

#### Attorneys' Fees for TILA Claim

- 3. Barnow and Associates has expended 375.2 hours in this litigation through September 21, 2023, for a total lodestar of \$259,567.50.
- 4. Barnow and Associates attorneys who worked on this case maintained contemporaneous time records reflecting the work and time spent on all billable matters. In all instances, the Barnow and Associates timekeeper indicated the date and amount of time spent on a

task to the tenth of an hour, described the work that was performed during the indicated time period, and identified the case to which the time should be billed.

 A summary of the lodestar of each of the Barnow and Associates attorneys who worked on this matter is in the table below:

Attorney	Title	Billable	Billable	Billable Fees
		Rate	Hours	
Ben Barnow	President	\$1,050	97.8	\$102,690.00
Anthony L. Parkhill	Associate	\$725	1.0	\$725.00
Erich Schork	Associate	\$725	101.8	\$73,805.00
Sharon Harris	Associate	\$525	100.7	\$52,867.50
Blake Strautins	Associate	\$400	73.1	\$29,240.00
Riley W. Prince	Associate	\$250/\$475 <sup>1</sup>	0.8	\$240.00
TOTALS:			375.2	\$259,567.50

- I include herewith at Exhibit B the time records in this case for Barnow and Associates.
- 7. Barnow and Associates' rates are reasonable and have been approved by courts throughout the country. Our firm's current hourly rates for attorneys that worked on this matter and are still with the firm are as follows: \$1,050/hour for Ben Barnow (President of Barnow and Associates); \$725/hour for Anthony L. Parkhill (senior associate); and \$475 for Riley W. Prince (associate). These hourly rates are the current usual and customary rates set by my firm for each individual and used in all current litigation matters, as periodically adjusted according to market rates.

  See, e.g., Kesner v. UMass Mem'l Health Care, Inc., No. 2185 CV 01210 (Worcester Cnty., Mass. May 25,

<sup>&</sup>lt;sup>1</sup> Riley W. Prince worked at Barnow and Associates as a law clerk while in law school. The lesser rate reflects his rate during this time.

2023 (approving Barnow and Associates' current hourly rates); Kostka v. Dickey's Barbecue Rests., Inc., 2023 U.S. Dist. LEXIS 110058, \*11 (N.D. Tex. June 6, 2023) (approving a fee award for plaintiffs' counsel, including Barnow and Associates' current rates); In re BJC Healthcare Data Breach Litigation, No. 2022-CC09492 (Circuit Court of the City of St. Louis, Missouri Sep. 6, 2022(approving fee award of \$790,000, which included Barnow and Associates' fees at rates of \$1,050/hour for Ben Barnow, \$725/hour for Anthony L. Parkhill, and \$425/hour for Riley W. Prince); Yamagata v. Reckitt-Benckiser, LLC, 17-cv-03529, ECF No. 238 (N.D. Cal. Oct. 28, 2021) (awarding \$12,500,000 of reasonable attorneys' fees, costs, and expenses on the basis of evidence submitted, including time records for Ben Barnow (\$950/hr) and Anthony L. Parkhill (\$650/hr)). The rates reflect what would be charged to a fee-paying client in the private legal marketplace for complex litigation. The rates are also in line with the rates charged by other firms that handle complex cases and class actions. For former attorneys, the rate used is the attorneys' rate when they left Barnow and Associates.

#### Barnow and Associates' Costs & Expenses

- 8. To date, Barnow and Associates has incurred \$4,971.76 in reasonable and necessary costs and expenses in connection with this case and which are properly attributable to Plaintiffs' TILA claim. These sums correspond to certain actual out-of-pocket costs and expenses, as reflected in our firms' records, and are the type of expenses routinely charged to paying clients in the marketplace and, thus awarded by courts in full.
- 9. A summary of the costs and expenses that Barnow and Associates has expended in this litigation can be found in the table below:

Description	Amount
Attorney Admission Fees	\$501.00
Legal Research (PACER, Westlaw)	\$1,895.89

Travel Costs (including lodging, airfare, meals, transportation, etc.)	\$2,539.74
Postage	\$16.76
External Printing	\$4.75
Conference Call Charges	\$13.62
Total	\$4,971.76

- 10. Attached hereto as Exhibit C is an itemized list of Barnow and Associates' costs and expenses.
- 11. These do not include any costs or expenses that are solely attributable to Plaintiffs' breach of contract claim, such as expenses relating to the appeal of this Court's dismissal of that claim or incurred by Class Counsel for purposes of trying such claim.

I declare under the penalty of perjury that the foregoing is true and correct.

Ben Barnow

Executed this 25th day of September, 2023, in Chicago, Illinois.

## Exhibit A

## BEN BARNOW

#### BARNOW AND ASSOCIATES

a professional corporation
Attorneys at Law

Ben Barnow is nationally recognized for his experience in leading some of the nation's largest class actions. In that capacity, he has successfully led the prosecution of a number of large-scale class actions relating to consumer data security breaches, consumer protection issues, and antitrust violations. He has been appointed to and served in leadership positions in cases throughout the nation, in both state and federal courts, including MDL proceedings. His efforts have delivered resolutions in numerous significant cases, including cases against America Online, DaimlerChrysler, McDonald's, Microsoft, Shell Oil, Sony, TJX, and Toyota.

Ben Barnow graduated from the University of Wisconsin in 1966 with a Bachelor's degree in Business Administration. He received his Juris Doctor from the University of Michigan Law School in 1969. He is licensed to practice in the State of Illinois and the State of New York. Mr. Barnow is also admitted to practice before the Supreme Court of the United States, the United States Court of Appeals for the First, Third, Fifth, Sixth, Seventh, Eighth, and Ninth Circuits, the United States District Court for the Northern District of Illinois, the Central District of Illinois, the District of Colorado, the Eastern District of Wisconsin, the Western District of Wisconsin, and the Eastern District of Michigan. He is a member of the American Bar Association, the American Association for Justice, the Illinois State Bar Association, and the Chicago Bar Association. He has also served as a member of the Panel of Arbitrators of the American Arbitration Association. He is listed in Martindale-Hubbell with an AV rating.

During his over fifty-year legal career, Ben Barnow has represented both plaintiffs and defendants in many types of litigation and has engaged in significant transactional work. He was General Counsel to one of the world's largest public relations agencies and presided as chairman of certain of its retirement trusts. Ben Barnow was an Associate Professor at Northern Michigan University from 1969- 1971, where he taught business law and unfair competition. Mr. Barnow joined the law firm of Herrick, McNeill, McElroy & Peregrine in July 1971, where he became a partner in 1977.

As part of a series of articles by Law360 featuring notable plaintiff attorneys, Ben Barnow was recognized as a Titan of the Plaintiffs Bar, and Barnow and Associates, P.C. "a plaintiffs' class action outfit known for winning big-time antitrust and data breach settlements." Sindhu Sundar, Titan of the Plaintiffs Bar: Ben Barnow, Law360 (Oct. 8, 2014), https://www.law360.com/articles/585655/titan-of-the-plaintiffs-bar-ben-barnow (last visited June 3, 2019).

#### **Selected Cases**

#### **Data Security Breach Cases**

**Kesner v. UMass Memorial Health Care, Inc.** Serving as one of Settlement Class Counsel in this class action relating to a data breach that affected the personally identifiable information and personal health information of 209,000 persons, Ben Barnow helped create a fund of \$1,200,000 that allowed class members to select between a cash payment or reimbursement for lost expenses and time and credit monitoring services.

*Easter v. Sound Generations*. Ben Barnow was appointed as class counsel and crafted a settlement that made available cash payments, credit monitoring, and reimbursements for expenses and lost time dealing with the data incident for approximately 600,605 persons. The settlement provided a \$100,000 fund for class members whose Social Security numbers were affected in the data breach that was in addition to the other benefits provided under the settlement.

**Kostka v. Dickey's Barbecue Restaurants, Inc.** Appointed as one of class counsel in this data breach affecting approximately 725,000 Dickey's customers, Ben Barnow helped negotiate a settlement that created a \$2,350,000 common fund. The settlement allowed class members to select between a cash payment or credit monitoring services.

*McCullough v. True Health New Mexico, Inc.* Ben Barnow served as one of Class Counsel in this class action involving a medical data breach affecting a class of over 62,982 persons. Ben Barnow negotiated a settlement that allows class members to claim reimbursements for lost time and expenses that arose as a result of the data breach and obtain two years of credit monitoring and insurance services.

Cochran v. Kroger Co. Ben Barnow took a leading role in this litigation against Kroger involving a data breach of Accellion's File Transfer Appliance affecting a class of Kroger customers and employees. He was instrumental in negotiating a settlement that made benefits of \$5 million available to the settlement class. He was appointed as one of Class Counsel and the Settlement was finally approved.

*Hestrup, et al. v. DuPage Medical Group, Ltd.* Ben Barnow was appointed as one of Class Counsel in this medical data breach class action. He helped negotiate a settlement establishing a \$3 million fund for a class of approximately 655,000 persons. The settlement allowed for class members to select between reimbursement for damages incurred as a result of the data breach and alternative cash payments.

Lozano v. CodeMetro, Inc. Serving as Co-Lead Settlement Class Counsel in a case relating to a data breach of a medical industry business service provider, Ben Barnow secured a settlement making benefits of \$850,000 available to the class of approximately 98,700 persons. The plaintiff's claims against the defendant included claims for violations of the California Consumer Privacy Act and the California Confidentiality of Medical Information Act, claims that have only become more important in data breach litigation since.

*In re BJC Healthcare Data Breach Litig.* Ben Barnow served as Class Counsel in an action involving a medical data breach affecting a class of over 280,000 persons. Ben Barnow played a central role in negotiating a settlement allowing class members to claim reimbursements for certain expenses that arose as a result of the data breach.

*In re: Zappos.com Inc. Customer Data Security Breach Litigation.* Ben Barnow was one of Co-Lead Class Counsel and settlement class counsel in this litigation, which resulted in a landmark Ninth Circuit ruling recognizing the Article III standing of consumers harmed by data breaches. He also successfully opposed Zappos' petition for writ of certiorari to the Supreme Court of the United States, where he served as counsel of record for plaintiffs. After many years of litigation, he negotiated a settlement that was granted final approval. The Settlement provided Class Members with CAFA-compliant coupons that were redeemed for over \$5 million.

In Re: Sony Gaming Networks and Customer Data Security Breach Litigation, MDL No. 2258. The Honorable Anthony J. Battaglia appointed Ben Barnow to the Plaintiffs' Steering Committee—a committee of seven firms established to lead the litigation—in this MDL proceeding involving over 60 cases relating to a data security breach that affected approximately 50 million consumers in the United States and Canada. A settlement agreement was entered into and was granted final approval. At the final fairness hearing, Judge Battaglia remarked: "Just in the final analysis, the order, much like all the work by both sides throughout the case, has been impeccable, highly professional, and skilled. It's been a real pleasure dealing with you."

*In Re: TJX Retail Security Breach Litigation*, MDL No. 1838. Ben Barnow served as one of Co-Lead Settlement Class Counsel for the Consumer Track in this MDL proceeding relating to the theft of approximately 45 million credit and debit card numbers used at TJX stores and the personal information of over 454,000 TJX customers. Mr. Barnow took the lead in negotiating a settlement with TJX's attorneys that made available benefits valued at over \$200 million to the Class. The Honorable Judge Young granted final approval to the settlement, which he referred to as "excellent," and as containing "innovative" and "groundbreaking" elements.

In Re: Countrywide Fin. Corp. Customer Data Security Breach Litigation, MDL No. 1998. Ben Barnow served as one of Co-Lead Settlement Class Counsel in this forty-case MDL proceeding relating to a former Countrywide employee's theft and sale of millions of Countrywide customers' private and confidential information. Mr. Barnow negotiated a settlement that was granted final approval, making benefits valued at over \$650 million available to approximately 17 million Settlement Class Members. In the opinion granting final approval to the settlement, the Honorable Chief Judge Russell noted that "Co-Lead Settlement Counsel are nationally recognized in the field of class actions, particularly those involving security breaches," and stated that "the Court was impressed with Co-Lead Counsel and Countrywide counsels' knowledge and skill, as represented in the various motions and hearings that took place throughout this settlement process."

In Re: Heartland Payment Systems Inc., Data Security Breach Litigation, MDL No. 2046. Ben Barnow served as one of Co-Lead Counsel for the Consumer Track in this MDL proceeding relating to what, at the time, was reported as one of the largest data security breaches in history. Mr. Barnow negotiated a settlement on behalf of a Settlement Class that is estimated to include

more than 120 million members. Notice of the settlement was completed and only one objection was received. Final approval of the settlement was granted.

Winstead v. ComplyRight, Inc. Ben Barnow served as one of Co-Lead Settlement Class Counsel in this proceeding relating to the theft of approximately 665,000 individuals' private and confidential information (including Social Security numbers) from ComplyRight, Inc.'s web portal. Mr. Barnow and his Co-Lead Settlement Class Counsel negotiated a settlement that included the creation of a \$3,025,000 settlement fund and which allowed Settlement Class members to claim, at their selection, a cash payment, a protection plan option, or reimbursement of up \$200 in documented and unreimbursed out-of-pocket expenses incurred as a result of the Data Breach. Final approval of the settlement was granted.

Lockwood v. Certegy Check Services, Inc. Ben Barnow served as one of Co-Lead Settlement Class Counsel in this consolidated proceeding relating to the theft of approximately 37 million individuals' private and confidential information from Certegy Check Services, Inc.'s computer databases. Mr. Barnow organized all plaintiffs' counsel and pending cases without the benefit of an MDL and negotiated a settlement that was granted final approval, making benefits valued at over \$500 million available to Settlement Class Members. At the final fairness hearing, the Honorable Judge Merryday described the settlement as a "good deal," providing "a real benefit to a large class of persons" as "the result of the focused attention of skilled counsel for a protracted time."

*McGann v. Schnuck Markets, Inc.* Ben Barnow served as one of Co-Lead Settlement Class Counsel in this proceeding relating to the theft of the credit and debit card information of an estimated 777,000 individuals from point-of-sale terminals at affected Schnucks stores. Mr. Barnow negotiated a settlement that has been granted final approval, making significant benefits available to the Settlement Class.

**Rowe v. Unicare Life and Health Insurance Co.** Ben Barnow was Lead Counsel in this proceeding relating to the defendants' alleged failure to secure the private health information of approximately 220,000 individuals enrolled in the defendants' health insurance plans, resulting in such information being accessible to the public via the Internet. Mr. Barnow negotiated a settlement that was granted final approval, making benefits valued at over \$20 million available to Settlement Class Members. At the preliminary approval hearing, the Honorable Judge Hibbler described the efforts of the parties as "exemplary."

*Orr v. InterContinental Hotels Group, PLC.* Ben Barnow was appointed as one of Lead Class Counsel in this payment card data breach litigation. He successfully negotiated a class settlement providing a claim process for Class Members to seek reimbursement for certain expenses or fraudulent and unauthorized charges resulting from the data breach, subject to an aggregate cap of \$1.55 million. The settlement was granted final approval.

**Perdue v. Hy-Vee, Inc.** Ben Barnow served as one of Co-Lead Class Counsel in this payment card data breach case. His work with other Plaintiffs' counsel was instrumental in securing a settlement that made reimbursements available to class members. In addition, the defendant committed no less than \$20 million to maintaining data security enhancements.

#### **Deceptive Trade Practices and Other Consumer Protection Cases**

In re: 100% Grated Parmesan Cheese Marketing and Sales Practices Litigation. Ben Barnow was appointed as one of Co-Lead Counsel in this MDL relating to multiple retailers' parmesan cheese labels which advertised the products as "100% Grated Parmesan Cheese" even though the products contained substances other than parmesan cheese. Following the district court's dismissal of plaintiffs' deceptive labeling claims, Mr. Barnow and his co-counsel appealed the decision to the Seventh Circuit. The Seventh Circuit overturned the district court's order, finding that a reasonable consumer could believe that the phrase "100% Grated Parmesan Cheese" means that the product was 100% cheese. The Seventh Circuit's opinion has become one of the most important decisions in the deceptive labeling practices litigation area.

*Gann v. Nissan North America, Inc.* Ben Barnow served as one of Class Counsel in this case regarding defective continuously variable transmissions on 1.4 million 2013–2016 Nissan Altima vehicles. After successfully defeating Nissan's motions to dismiss the litigation in two separate courts, he negotiated a settlement providing reimbursement for out-of-pocket costs for prior transmission replacements and a warranty extension, collectively valued at over \$444 million.

*Warner v. Toyota Motor Sales, U.S.A., Inc.* Ben Barnow served as one of Co-Lead Counsel in this litigation regarding claims of excessive frame rust to certain Toyota vehicles, yielding a recent landmark settlement estimated at \$3.4 billion. Under the settlement, owners of 2005–2010 Toyota Tacoma, 2007–2008 Toyota Tundra, and 2005–2008 Toyota Sequoia vehicles are eligible for free frame inspections for a period of twelve years from the date the vehicle was originally sold or leased, or one year from the date of the Final Order and Judgment, whichever is longer. Vehicles that exhibit excessive frame rust are eligible for a free frame replacement.

**Rafofsky v. Nissan North America, Inc.** Ben Barnow served as Class Counsel in this litigation regarding the failure to timely deliver certain advertised infotainment apps on 2014 Infiniti Q50s. Class Counsel achieved a settlement in which class members could file claims for cash worth up to \$85 or for vouchers to purchase of a new Infiniti vehicle worth up to \$1,250.

*Palace v. DaimlerChrysler Corp.* Ben Barnow was one of Co-Lead Class Counsel in this litigation relating to the defendant's sale of Neons containing allegedly defective head gaskets. After several years of litigation, a settlement was granted final approval, making up to \$8.25 million available to Class members for reimbursement of repair costs and other expenses.

Schulte v. Fifth Third Bank. Ben Barnow served as one of Co-Lead Settlement Class Counsel in this action relating to allegations that the defendant unlawfully re-sequenced debit card transactions in order to maximize overdraft fees. In this capacity, he negotiated a settlement with Defendant's counsel providing for the establishment of a \$9.5 million settlement fund and including substantial injunctive relief, the present value of which Plaintiffs' expert estimated to be approximately\$58.8 million over five years and \$108.3 million over ten years. The settlement has been granted final approval.

Schwab v. America Online, Inc. (America Online Access Litigation). Ben Barnow served as Class Counsel and Co-Chair in this highly publicized litigation relating to AOL's representation that users would have unlimited access to AOL for \$19.95/month and the connectivity problems that ensued in conjunction therewith. In the face of what was ultimately over one hundred class actions filed nationwide, Mr. Barnow organized over 50 law firms and set up the co-chairmanship and the Executive Committee, which brought order and resolution to this litigation. A settlement was reached and was granted final approval, resulting in a multi- million-dollar benefit to a Class estimated to include over 8 million people.

*Miner v. Philip Morris USA, Inc.* Ben Barnow served as one of Class Counsel in this litigation concerning Philip Morris USA, Inc.'s practice of marketing and selling its Marlboro Lights and Marlboro Ultra-Lights cigarettes as less harmful to smoke than regular cigarettes when, in fact, they were not. A settlement was reached and granted final approval, providing for Philip Morris's payment of \$45 million into an escrow account for the benefit of Class members.

Boland v. McDonald's Corp. (McDonald's Sweepstakes Litigation). As Co-Lead Class Counsel in this litigation, Ben Barnow coordinated the efforts of approximately 25 plaintiffs' firms. The litigation concerned certain McDonald's promotional games and arose from the fraudulent removal of winning game pieces from random public distribution. Mr. Barnow developed and accomplished the settlement concept; to wit, for a chance lost, a chance would be given. The settlement, valued at approximately \$20 million, included fifteen \$1 million prizes given away by random selection. The settlement included the United States and nine other countries.

Campos v. Calumet Transload R.R., LLC. Ben Barnow served as one of Co-Lead Settlement Class Counsel in this litigation relating to the defendants' alleged negligent storage and handling of petroleum coke and coal at certain industrial storage facilities in Chicago, Illinois. Two settlements were reached which collectively provided for the payment of \$1,455,000 for the benefit of Settlement Class members. The settlements were granted final approval.

Fernandez v. Vitamin Shoppe Industries, Inc. Ben Barnow served as Co-Lead Counsel in this national class action that settled, resulting in injunctive relief regarding labeling practices, and additional relief by way of discount coupons and cy pres relief to appropriate charities. Gianopolous v. Interstate Brand Corp. and Interstate Bakeries Corp. Ben Barnow was appointed one of Class Counsel in this litigation concerning allegedly adulterated bakery goods. A settlement was reached and granted final approval, making valuable relief available to consumers.

*Glenz v. RCI, LLC.* Ben Barnow served as one of three Class Counsel in this litigation involving the RCI Points program and allegations of improper use of points by RCI. The settlement made available cash benefits of approximately \$19 million to members of the Settlement Class and included substantial injunctive relief. Final approval of the settlement has been granted.

*Heilman v. Perfection Corp.* Ben Barnow served as Co-Lead Class Counsel in this national class action concerning allegedly defective dip tubes in over 14.2 million hot water tanks sold throughout the United States. In this capacity, Mr. Barnow organized twenty-three law firms and oversaw numerous filings in bringing about a national unified settlement that provided for a 100%

recovery of out-of-pocket expenses and requisite repairs, including preventive replacement of all concerned dip tubes, whether or not the dip tubes had actually failed.

In Re: Chicago Flood Litigation. As Co-Lead Class Counsel and a member of the Executive Committee, Ben Barnow was responsible for several major aspects of this class action, which included years of litigation, appellate practice, trial, and a multi- million-dollar settlement. Mr. Barnow argued a related portion of the matter before the Supreme Court of the United States, Jerome B. Grubart, Inc. v. Great Lakes Dredge & Dock Co., 513 U.S. 527 (1995), and was responsible for preparing the petition for a writ of certiorari and all related filings. At the Supreme Court level, opposing counsel was John Roberts, who now sits as Chief Justice of the Supreme Court of the United States.

*In Re: High Sulfur Content Gasoline Products Liability Litigation*, MDL No. 1632 ("Shell Oil"). Ben Barnow served as Co-Lead Settlement Class Counsel in this 26- case MDL proceeding relating to the defendant's alleged sale of defective gasoline. A settlement was reached and was granted final approval, resulting in approximately \$100 million being made available towards the satisfaction of consumers' claims.

*In Re: Mercury Class Action Litigation.* Ben Barnow served as Co-Lead Class Counsel in this case relating to the location of mercury-containing gas regulators in and on real estate. A settlement was reached and granted final approval that provided for medical monitoring, removal of the regulators, and cash compensation to certain class members.

*In Re: M3Power Marketing Practices Litigation*, MDL No. 1704. Ben Barnow was appointed Co-Lead Class Counsel in this MDL proceeding relating to the defendant's allegedly deceptive marketing and sale of M3Power shaving razors. A settlement was reached and granted final approval, making available benefits of more than \$7 million to Class members.

*In Re: Pilot Flying J Fuel Rebate Contract Litigation.* Ben Barnow served as one of Settlement Class Counsel in this litigation involving allegations that the defendants withheld portions of fuel discounts and rebates that Class members were contractually entitled to receive in violation of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961-68 ("RICO"), and various state laws. The settlement was granted final approval.

In Re: Starlink Corn Products Liability Litigation, MDL No. 1403. Ben Barnow served as Co-Lead Class Counsel in this MDL proceeding relating to the alleged inclusion of genetically engineered corn in the defendants' food products. A settlement was reached, valued at \$9 million, including the return of up to \$6 million to consumers on a fluid recovery/cy pres basis through price reduction on future purchases coupled with a cash payment to approved charities based on shortfall in the redemption.

*In Re: United Parcel Service, Inc., Shipper Excess Value Insurance Coverage Litigation.* Ben Barnow was one of Settlement Class Counsel in this litigation. A settlement was reached and granted final approval, providing relief to UPS shippers who had paid premiums for excess value insurance coverage.

*Ori v. Fifth Third Bank.* Ben Barnow served as one of Co-Lead Settlement Class Counsel in this action relating to inactive mortgage loans that were erroneously reported as active to Consumer Credit Reporting Agencies. The Settlement Class included approximately 55,000 individuals, and the settlement made available cash benefits of approximately \$3,000,000 to members of the Settlement Class. Final approval of the settlement has been granted.

*Orrick v. Sonic Communications.* Ben Barnow was one of Lead Class Counsel in this matter relating to the practice known as "slamming." The private actions and actions filed on behalf of various Attorneys General were consolidated. A settlement covering all of the pending cases and providing benefits of approximately \$8.3 million was achieved and granted final approval. This litigation is believed to be the first class certification and settlement relating to the practice known as "slamming."

**Rosen v. Ingersoll-Rand Co., Kryptonite Corp.** Ben Barnow was Co-Lead Class Counsel in this matter relating to allegedly defective bicycle locks. Mr. Barnow organized 18 U.S. and Canadian law firms and negotiated a settlement on behalf of Class members in the U.S. and Canada. The settlement was granted final approval, providing valuable relief to purchasers of the allegedly defective U-shaped tubular cylinder bicycle locks in the U.S. and Canada.

Schneider v. Dominick's Finer Foods, Inc. Ben Barnow was Co-Class Counsel in this matter relating to the defendant's alleged failure to deliver on representations of 100% ground beef. A settlement was reached and granted final approval, which included significant remedial relief in the form of shop signage regarding cleanliness and meat grinding practices, and fluid recovery mechanisms to compensate the class members by way of in-store sales and published coupons.

**Schwab v. Binney & Smith.** Ben Barnow served as Co-Lead Class Counsel in this case relating to crayons that were produced for decades with talc, which allegedly contained, or was subject to containing, asbestos. Mr. Barnow negotiated a national class settlement that contributed to the reformulation of most crayons produced in this country, so as to eliminate the inclusion of talc and, thus, the alleged asbestos inclusion, and the settlement was granted final approval. This represented one of the largest classes ever certified, if not the largest.

*Siegel v. Syncronys.* Ben Barnow was Co-Class Counsel in this nationwide class action concerning an allegedly defective computer product. The matter was settled, resulting in a remedy for the Class that provided for a 100% reimbursement on moneys spent for the product; the value of the settlement was estimated at \$22 million.

Smith v. J.M. Smucker Co. Ben Barnow was Class Counsel in this litigation relating to allegedly deceptive advertising practices. Mr. Barnow negotiated a national settlement and organized a group of plaintiffs' counsel from over 25 firms throughout the country who supported the settlement. The settlement was granted final approval, making available valuable relief to consumers of spreadable fruit products labeled "Simply 100% Fruit," including a change of labeling practices by the defendant, which added and maintained the following language, in prominent fashion, on the front label of its Simply 100% Fruit products: "Sweetened with fruit syrup from apple, pineapple or pear juice concentrate," thus fairly and fully advising consumers of the product they were purchasing.

*Stelk v. BeMusic, Inc.* Ben Barnow served as Co-Lead Class Counsel in this litigation relating to charges for shipping and handling in the context of a "free" offer. The Class included an estimated 16 million members. A settlement was reached and granted final approval providing substantial relief to Class members, including a guaranteed minimum of \$8 million.

#### **Antitrust Cases**

Wisconsin Civil Microsoft Antitrust Litigation. Ben Barnow served as one of Co- Lead Class Counsel in this indirect purchaser antitrust lawsuit. Mr. Barnow and his co-counsel successfully petitioned the Wisconsin Supreme Court to recognize the rights of indirect purchasers to recover under Wisconsin's antitrust laws. Olstad v. Microsoft Corp., 700 N.W.2d 139 (Wis. 2005). Subsequently thereto, Mr. Barnow negotiated a settlement valued at approximately \$224 million that was granted final approval.

*Arkansas, Kansas, South Dakota Civil Microsoft Antitrust Litigations.* Ben Barnow served as a Co-Lead Class Counsel in the Arkansas, Kansas, and South Dakota Microsoft civil antitrust cases. Each of these cases settled, and the settlements were granted final approval.

*Microsoft Civil Antitrust Litigation*, MDL No. 1332. Ben Barnow served as a member of the ninemember Plaintiffs' Lead Counsel Committee in this MDL antitrust proceeding before Judge Motz in the United States District Court for the District of Maryland.

Fond Du Lac Bumper Exchange, Inc. v. Jui Li Enterprise Co., Ltd. Ben Barnow served as a Co-Lead Counsel for third-party payor plaintiffs in this antitrust action where settlements were reached and finally approved collectively providing for the payment of \$9,850,000 for the benefit of the Settlement Class.

**Loeb Industries, Inc. v. Sumitomo Corp.** Ben Barnow served as Co-Lead Counsel in this nationwide antitrust class action, which sought recovery on behalf of scrap copper purchasers who were allegedly harmed by activities designed to manipulate the copper market. A \$20 million cash settlement with one of the defendants (Merrill Lynch) was reached.

*Vichreva v. Cabot Corp.* Ben Barnow served as Co-Lead Counsel in this Florida antitrust litigation. An \$825,500 common fund, which is believed to be the largest per-consumer Carbon Black state court antitrust class action settlement in the country, was obtained.

#### **Public Speaking Engagements**

- 1. HarrisMartin's Equifax Data Breach Litigation Conference (Atlanta, GA, Nov. 10, 2017), topic: "Settlements" (Program Co-Chair)
- 2. Bridgeport Continuing Education's 2016 Class Action Litigation & Management Conference (Los Angeles, CA, Apr. 15, 2016) (Program Co- Chair)

- 3. HarrisMartin's Data Breach Litigation Conference: The Coming of Age (San Diego, CA, Mar. 25, 2015), topic: "Creative Approaches to Settling Data Breach Cases."
- 4. Bridgeport Continuing Education's 2014 National Consumer Class Action Conference (Chicago, IL, Jun. 12-13, 2014); topic: "Privacy/TCPA Class Actions: State of the Law, Claims and Defenses, What Does the Future Hold?"
- 5. HarrisMartin's MDL Conference: Target Data Security Breach Litigation (San Diego, CA, Mar. 26, 2014); topic: "Settlement of a Data Breach Case."
- 6. NetDiligence Cyber Risk & Privacy Liability Forum (Marina del Rey, CA, Oct. 11–12, 2012).
- 7. 25th Annual Producer Conference (Stowe, VT, Sept. 10–12, 2012); topic: "Cyber 2.0—The Evolution of Cyber in the Boardroom."
- 8. NetDiligence 2012 Cyber Risk & Privacy Liability Forum (Philadelphia, PA, June 4–5, 2012); topic: "State of the Cyber Nation—Cases, Theories, and Damages."
- 9. Tulane University Law School's symposium on The Problem of Multidistrict Litigation (February 15–16, 2008); topic: "The Practicalities of Multidistrict Litigation."

## ANTHONY L. PARKHILL

#### BARNOW AND ASSOCIATES

a professional corporation ATTORNEYS AT LAW

Anthony L. Parkhill has more than eight years of litigation experience and has spent the last six years prosecuting some of the nation's largest complex consumer fraud, automotive defect, and privacy class action matters.

Mr. Parkhill graduated from DePaul University with a Bachelor's degree in Political Science in 2010. He received his Juris Doctor from the University of Chicago Law School in 2014. He is licensed to practice in the State of Illinois. He is also admitted to practice before the United States Courts of Appeals for the Seventh Circuit, the United States District Court for the Northern District of Illinois, the United States District Court for the Central District of Illinois, the United States District Court for the District of Colorado, and the United States District Court for the Eastern District of Michigan. He is a member of the Illinois State Bar Association.

Mr. Parkhill has served in leadership roles in multiple class action lawsuits, including the following: Cochran v. Kroger Co. (N.D. Cal.) (appointed as one of Class Counsel in this data breach class action against Kroger and helped negotiate a settlement making \$5 million in benefits available to the class); Kesner v. UMass Memorial Health Care, Inc., (Mass. Super. Ct. -Worcester) (served as one of class counsel and aided in creating a settlement fund of \$1,200,000 for a class of approximately 209,000 class members); Easter v. Sound Generations, No. 21-2-16953-4 SEA (Sup. Ct., King County, WA) (appointed as one of settlement class counsel and helped achieve a settlement that allowed for claims of cash payments, credit monitoring, and reimbursements for expenses and lost time dealing with the data incident for approximately 600,605 persons); Kostka v. Dickey's Barbecue Restaurants, Inc., No. 3:20-cv-3424 (N.D. Tex.) (appointed as one of Additional Class Counsel in this payment card data breach that affected approximately 725,000 of Dickey's customers and helped create a settlement creating a common fund of \$2.350,000); McCullough v. True Health New Mexico, Inc., No. D-202-CV-2021-06816 (2nd Dist. Ct. of New Mexico) (appointed as one of settlement class counsel and helped negotiate a settlement that allows class members to claim reimbursements for lost time and expenses that arose as a result of the data breach and obtain two years of credit monitoring and insurance services); Lozano v. CodeMetro, Inc. (Super. Ct. San Diego, Cal.) (serving as one of settlement class counsel in this data breach class action and helped achieve a settlement making benefits of \$850,000 available to the class of approximately 98,700 persons); Rafofsky v. Nissan North America, Inc. (C.D. Cal.) (appointed as one of class counsel where a class settlement was granted final approval).

Mr. Parkhill has played an active role in litigating the following class action matters that successfully settled: *Gann v. Nissan North America, Inc.* (M.D. Tenn.) (settlement reached in case regarding defective transmissions providing reimbursement for out-of-pocket costs for prior transmission replacements and a warranty extension, collectively valued at over \$444 million); *Warner v. Toyota Motor Sales, U.S.A., Inc.* (C.D. Cal.) (settlement reached regarding allegations

of excessive frame rust to certain vehicles providing benefits valued at in excess of \$3.4 billion to Settlement Class members); Hestrup, et al. v. DuPage Medical Group, Ltd. (DuPage Cty. Circ. Ct., Illinois) (settlement establishing a common fund of \$3 million relating to a medical data breach); In re BJC Healthcare Data Breach Litig. (St. Louis Circ. Ct., Missouri) (settlement allowing a class of over 280,000 persons to claim reimbursements for certain expenses that arose as a result of a medical data breach); Winstead v. ComplyRight, Inc. (N.D. III.) (settlement reached relating to a data breach providing a \$3.025 million fund to approximately 665,000 class members); Perdue v. Hy-Vee, Inc. (C.D. Ill.) (settlement reached relating to a payment card data breach, allowing for class members to receive reimbursements for damages resulting from the breach); Orr v. InterContinental Hotels Group, PLC (N.D. Ga.) (settlement reached in payment card breach case providing reimbursement for certain expenses subject to an aggregate cap of \$1.55 million); Fond Du Lac Bumper Exchange, Inc. v. Jui Li Enterprise Co., Ltd. (E.D. Wis.) (settlements reached with four of six defendants in this ongoing international antitrust action providing for the payment of \$9,850,000); Campos v. Calumet Transload R.R., LLC (N.D. Ill.) (settlements reached providing for payment of \$1,455,000 for the benefit of the Settlement Class in action relating to the alleged negligent storage and handling of petroleum coke and coal at certain industrial storage facilities); and In re Zappos Security Breach Litigation (D. Nev.) (settlement providing class with benefits in excess of \$5 million); and Cullan and Cullan LLC v. m-Qube, Inc., (D. Neb.), (making over \$1 million available to victims of cell phone cramming).

## RILEY W. PRINCE

#### BARNOW AND ASSOCIATES

a professional corporation ATTORNEYS AT LAW

Riley W. Prince graduated from the University of Michigan-Ann Arbor in 2017 with Bachelor's degrees in Political Science and Spanish. He received his Juris Doctor from the Chicago-Kent College of Law in 2021. Mr. Prince has been a part of Barnow and Associates, P.C. since January of 2020, working as a clerk with the firm while in law school. Mr. Prince is licensed to practice in the State of Illinois and is admitted to practice before the United States District Court for the Northern District of Illinois, the United States District Court for the Central District of Illinois, and the United States District Court for the Eastern District of Michigan.

Mr. Prince has played a significant role in many data breach class actions that have resulted in finally approved settlements. *See Hestrup, et al. v. DuPage Medical Center, Ltd.*, No. 2021L937 (DuPage Cty. Circ., Illinois) (a medical data breach class action that resulted in a settlement establishing a \$3 million fund for approximately 655,000 class members); *Kesner v. UMass Memorial Health Care, Inc.*, (Mass. Super. Ct. – Worcester) (a medical data breach class action where a settlement fund of \$1,200,000 for a class of approximately 209,000 class members was established); *Easter v. Sound Generations*, No. 21-2-16953-4 SEA (Sup. Ct., King County, WA) (a medical data breach class action that allowed for claims of cash payments, credit monitoring, and reimbursements for expenses and lost time dealing with the data incident for approximately 600,605 persons); *McCullough v. True Health New Mexico, Inc.*, No. D-202-CV-2021-06816 (2nd Dist. Ct. of New Mexico) (a medical data breach class action where a settlement was reached that allows class members to claim reimbursements for lost time and expenses that arose as a result of the data breach and obtain two years of credit monitoring and insurance services).

## NICHOLAS W. BLUE

#### BARNOW AND ASSOCIATES

a professional corporation
ATTORNEYS AT LAW

Nicholas W. Blue is an associate at Barnow and Associates, P.C. Mr. Blue attended the University of Missouri, earning degrees in Anthropology and Political Science and graduating with Honors in 2019. He was a member of Phi Beta Kappa and a Fellow at the Kinder Institute on Constitutional Democracy. He received his Juris Doctor from Washington University School of Law in 2022. Mr. Blue is admitted to practice in the State of Illinois and the United States District Court for the Northern District of Illinois. Mr. Blue's practice focuses on complex class action litigation, data breach and privacy litigation, and consumer protection cases.

## Exhibit B

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Date Ho	BARNOW AND ASSOCIATES' TIME ENTRIES Hours Description	Rate (\$) Billable (\$) User	Case:
1/23/2020	0.40 Corrected date docketing and calendaring	200	1:42 1:42 1:40 Anthony Parkill
8/24/2016	O.30 Investigate case status for BB	200	<mark>○                                    </mark>
7/21/2020	0.10 discussed status with ES and BB	200	50 Anthony Parkhill
12/17/2020	0.10 discussed status with ES and BB	200	So Anthony Parkhill
2/7/2022	0.10 discussed status with BB and RP	650	65 Anthony Parkhill
	1.00		303-1
1/9/2020	0.30 Review email from S.S. re deposition preparation, call with ES to discuss same	875	262.5 Ben BarnowTT
2/24/2020	0.10 Email from ES re status of depo. and appearances from additional counsel (trial counsel - Williams and Connelly); consider same	875	d: 32.5 Ben Barnow
7/30/2012	0.30 Review complaint; discuss with SH and ES	875	262.5 Ben Barnow 262.5
8/9/2012	0.20 Review filing; email re service	875	175 Ben Barnove
8/9/2012	0.30 Call to DH; email from and to JK re call and service	875	262.5 Ben Barnow
9/6/2012	0.20 Call to defense counsel (returned his)	875	175 Ben Barnov
9/6/2012	0.20 Email re same	875	175 Ben Barnow H
9/7/2012	0.80 Call to B Wall; emails re same with co-counsel; consider same; review pleadings; call from BW re settlement	875	700 Ben Barnow
9/18/2012	0.80 Call with BW; emails; consider same	875	10737 200 Ben Barnoo 200

9/18/2012	0.20 Discussion with BS re status	875	Cas
9/19/2012	0.40 Emails with plaintiffs counsel re open issues	875	350 Ben Barnow
9/19/2012	0.20 Call with defense counsel re his extension and status of settlement discussion	875	2-GV-(
9/19/2012	0.20 Call with Brett re follow up to last call	875	175 Ben Barnov
9/19/2012	0.30 Emails from and to plaintiffs counsel re status of extension and motion (plaintiffs do not have to show up for case management)	875	262.5 Ben Barnow C
9/20/2012	0.80 Email from defense counsel; work on proposed order; related emails; discussions with ES	875	700 Ben Barnow C
10/1/2012	0.30 Emails with BW re 26(f) conference	875	#: 303
10/1/2012	0.50 Emails with plaintiffs' counsel re same	875	8-13 Ben Barnow F
10/8/2012	0.90 Re-work, draft, letter to B Wall re settlement; discuss with BS; finalize	875	787.5 Ben Barnow
10/9/2012	0.60 Work on letter; review JKs comments; consider all comments, re-do	875	12/ <b>26</b> / 252 Ben Barnow
10/10/2012	0.50 Review, discuss settlement proposal letter	875	437.5 Ben Barnow
10/15/2012	0.30 Review brief, make suggestions/changes	875	1962.5 Ben Barnow
10/17/2012	0.30 Discuss proposed motion with SH; finalize same; send to opposing counsel	875	362.5 Ben Barnow 262.5
10/18/2012	0.40 Email from KF (defense counsel) re motion to excuse client; respond to same	875	350 Ben Barnowd
10/18/2012	1.50 Draft and finalize our motion to excuse client from CMC; emails re same; discuss with SH	875	1312.5 Ben Barnov
10/19/2012	0.20 Discuss Rule 26(f) report with BS	875	#: 175 Ben Barnow : #
10/20/2012	0.30 Call to BS re Rule 26(f) filing; search emails; email to BW and KF et al.	875	738 362.5 Ben Barnov

10/22/2012	0.40 Emails re Rule 26(f); finalize	875	350 Ben Barnow
10/22/2012	0.20 Emails re Thursday's court hearing	875	1:12 Ben Barnov 175
10/23/2012	0.20 Discussed with SH the canceling of the CMC	875	175 Ben Barnow 00
10/24/2012	0.20 Review emails; respond	875	175 Ben Barnow 179
10/25/2012	0.60 Review emails and attachments on amended and supplemental filing	875	525 Ben Barnova
10/25/2012	0.90 Calls and discussions with HZ re 5/3 case; review JK article; consider same	875	00 00 #:
10/25/2012	0.40 Further emails re motion	875	350 Ben Barnoy
11/28/2012	0.50 Review/consider MTD issues and arguments	875	13 File
1/9/2013	0.30 Review proposed report and emails re same; consider same	875	ed: 12 d: 302:5 Ben Barnow:
1/10/2013	0.30 Emails re conference calls and update	875	7267.5 Ben Barnow
1/22/2013	0.20 Conference call	875	175 Ben Barnows
1/23/2013	0.80 Conference call with court; consider same; emails re same	875	200 Ben Barnow 2007
2/13/2013	1.20 Review FL filing; emails with co-counsel; compare pleadings	875	1050 Ben Barnow
2/14/2013	0.20 Call to HZ	875	PAGE 175 Ben Barnow
2/14/2013	0.20 Call to TT re AR counsel	875	175 Ben Barnow ::
2/14/2013	0.20 Call to opposing counsel	875	10739 Barnow 175 Ben Barnow 175

2/15/2013	2.00 Work on settlement proposal; review articles	875	1750 Ben Barnows
2/15/2013	0.20 Emails and call to K Fanter	875	9:175 Ben Barnow
2/15/2013	0.20 Email from JK; consider same	875	2- <b>Q</b> - <b>O</b>
2/15/2013	0.80 Work on settlement proposal	875	00851 200 Ben Barnov
2/16/2013	3.20 Develop settlement proposal; structure; emails to BS et al. and HZ; consider; review materials	875	2800 Ben Barnow
2/18/2013	0.30 Review SH email re comments to settlement proposal; consider same	875	262.5 Ben BarnowO
2/18/2013	0.20 Calls to HZ re same	875	#: 175 Ben Barnow
2/18/2013	4.00 Work on settlement proposal; review comments from ES, SH, and HZ; research; consider same	875	3-13 F
2/19/2013	0.20 Email to HZ re proposal and emails from and to RF	875	175 Ben Barnow
2/19/2013	2.50 Work on settlement proposal	875	2187.5 Ben Barnow/9
2/19/2013	0.20 Call with HZ	875	23 Pen Barnow 175 Ben
2/19/2013	0.20 Call to KF	875	175 Ben Barnow
2/20/2013	2.50 Work on settlement proposal; emails and calls with HZ; emails with SS and related emails	875	2187.5 Ben Barnow 2
2/24/2013	0.60 Review materials re settlement	875	525 Ben Barnowd
2/25/2013	0.80 Calls with KF and BW re settlement; consider same	875	D Emouse Barnow 200
2/25/2013	0.40 Emails to and from HZ and SS	875	350 Ben Barnow: :
2/25/2013	0.40 Discuss with BS settlement issues	875	350 Ben Barnow 350

Casen Barnov	1:12-	525 Ben Barnow 00	700 Ben Barno <mark>f 5</mark>	NR Sen Barnow 100	175 Ben BarnowO	303 -1	262.5 Ben Barnow 1	ed: 32.5 Ben Barnow.	175 Ben Barnow 175 Be	525 Ben Barnowd	262.5 Ben Barnow 99	200 Barnov 200 700 700 700 700 700 700 700 700 700	PAGE Barnow 875 Ben Barnow B	350 Ben Barnow	1Q741
875	875	875	875	875	875	875	875	875	875	875	875	875	875	875	875
0.20 Discuss state of settlement with BS	0.50 Calls to and with HZ re status	0.60 Emails re going forward; consider same	0.80 Emails with HZ re status and FL case; calls with HZ; consider same	0.80 Calls to other counsel (with HZ); review calls to HZ	0.20 Email re conference call; consider same	0.80 Consider status, develop strategy; email to HZ re calls	0.30 Emails and call with HZ re upcoming conference call	0.70 Conference call with FL/AK group; review same	0.20 Call with HZ re call with KF and BW	0.60 Prepare for and call with Karl and Brett; review same with HZ	0.30 Emails re status; respond to same	0.80 Conference call with co-counsel; consider same	1.00 Work on draft settlement letter	0.40 Review proposed JLA emails from and to HZ and JS re same	0.80 Work on (review, draft) letter to FL/AR lawyers; emails to and from HZ re same
2/26/2013	2/27/2013	2/27/2013	2/28/2013	2/28/2013	2/28/2013	3/1/2013	3/1/2013	3/1/2013	3/1/2013	3/1/2013	3/4/2013	3/4/2013	3/5/2013	3/6/2013	3/7/2013

3/8/2013	0.90 Work on re-draft, JLA; emails re same	875	787.5 Ben Barnows
3/11/2013	0.20 Emails to and from HZ	875	.: 175 Ben Barnow 1: 1
3/13/2013	0.40 Discuss with ES current status	875	350 Ben Barnov
3/16/2013	2.50 Work on damages and injunctive relief considerations; emails to HZ	875	2187.5 Ben Barnov <b>800</b>
3/17/2013	1.50 Work on settlement; review materials; consider same	875	1312.5 Ben Barnow Barno
3/19/2013	0.20 Email from HZ; respond	875	175 Ben Barnovo
3/19/2013	0.20 Call from HZ	875	#: 303
3/19/2013	0.20 Calls and emails to KF and BW	875	175 Ben Barnow E
3/19/2013	0.20 Further emails (to KF, BW, HZ, and SH) re setting of conference call	875	175 Ben BarnowD
3/19/2013	0.90 Conference call with defense counsel and HZ; review call with HZ and JK; consider same	875	787.5 Ben Barnow/7
3/20/2013	0.30 Call to and from IL counsel	875	262.5 Ben Barnow 200.5
3/20/2013	0.20 Emails re court conference	875	175 Ben Barnow.
3/20/2013	0.40 Call with HZ and JK re status, attempt ideas; consider same	875	7 of 51
3/22/2013	1.20 Review settlement status; emails with JK; work on proposal; finalize; email to defense counsel	875	1050 Ben Barnowd
3/26/2013	0.20 Discuss issues with SH	875	175 Ben Barnow D
3/28/2013	1.20 Work on letter to late-case counsel; emails re same; discuss with SH; finalize	875	1050 Ben Barnow
3/28/2013	0.60 Calls and emails to KF and BW	875	255 Ben Barnow

3/28/2013	0.60 Emails re sending of letter; discuss with SH; review of final sent from HZ office	875	Cass Ben Barnows
3/29/2013	0.60 Emails re status of response from FL/AR group	875	1: <mark>12-</mark>
3/29/2013	0.30 Calls to FL counsel and AR counsel	875	262.5 Ben Barnow A
3/29/2013	1.50 Emails to HZ and JK re status and consideration of open issues; consider same; finalize and send email to K and B	875 1	1312.5 Ben Barnow 1317.5 Pen B
3/29/2013	0.30 Discuss with BS FL plaintiffs' counsel issue	875	Z62.5 Ben Barnova
4/2/2013	0.50 Emails re status (FL filings); review proposed strategy; consider; respond to same	875	00 00 437.5 Ben Barnow
4/2/2013	0.30 Call to FL counsel, left message	875	262.5 Ben Barnow
4/2/2013	0.40 Call with KM re status	875	350 Ben Barnow 350
4/4/2013	0.20 Emails re counsel call and call with the court	875	ed: 12 8en Barnow: 175
4/4/2013	0.40 Call with co-counsel to prepare for court call	875	350 Ben Barno
4/4/2013	0.50 Call with court and review of same	875	437.5 Ben Barnow
4/4/2013	0.40 Email and call re telephone conference with other plaintiffs' counsel	875	350 Ben Barnow 3
4/4/2013	0.60 Conference call with plaintiffs counsel; emails in review of same	875	of 532 Ben Barnov
4/4/2013	0.60 Work on appointment motion; emails re same	875	PAGE 825 Ben Barnow
4/5/2013	0.20 Emails re status on call with FL/AR counsel	875	175 Ben Barnov
4/5/2013	0.40 Review S. Owings letter; emails re same; consider same	875	10743 320 Ben Barnon 320 Ben Barnon

4/15/2013	0.20 Discuss with HZ and JK	875	175 Ben Barnows
4/18/2013	0.50 Emails re appointment motion; review draft	875	6: 437.5 Ben Barnow
4/23/2013	1.20 Work on appointment motion; email re same	875	2-Gv-(
4/25/2013	0.50 Work on and discuss appointment motion	875	437.5 Ben Barnov
4/26/2013	0.70 Review motion and memo for appointment; email; revised draft	875	612.5 Ben Barnow
4/30/2013	0.20 Emailed from SH re draft appointment motion	875	175 Ben BarnowO
5/2/2013	0.20 Call with SH re drafts	875	#: 303 175 Ben Barnow
5/20/2013	0.60 Emails re Judge King order, motion from Laskaris group; consider same; review the filing; responsive emails re same	875	3-13 Ben Barnow
6/4/2013	0.40 Emails re opposing counsel and letter to organize; consider same	875	350 Ben Barnow
6/4/2013	0.80 Review opposition to appointment motion; emails re same	875	12/ <b>2</b> 6/ 200 Ben Barnov
6/6/2013	0.60 Review proposed letter; consider same; emails re same	875	23 Ben Barnow 525
6/27/2013	0.50 Emails with HZ et al. re court call; call with HZ and SS in prep for the call	875	437.5 Ben Barnow.
6/28/2013	0.50 Conference call re appointment papers; consider same	875	437.5 Ben Barnow <b>Q</b>
7/10/2013	0.20 Email from AZ; respond to same	875	175 Ben Barnow  V
7/10/2013	0.20 Email and call to SH re edits and finalize	875	G Elmourage D
7/11/2013	0.90 Emails re tomorrow's meeting; preparing for same; review materials	875	#: 187.5 Ben Barnow.
7/12/2013	12.00 Travel; prepare for meeting; calls with co-counsel; meeting with co-counsel; meeting with all counsel and the court; review meeting; consider same	875	10500 Ben Barnow

Casen Barnova 875 350 Ben Barnova	875 437.5 Ben Barnow 1.	875 175 Ben Barnow 00	875 262.5 Ben Barnow 1	875 262.5 Ben Barnow	875 175 Ben Barnow? #:	875 262.5 Ben Barnov	875 262.5 Ben Barnow <del>1</del>	875 175 Ben Barnow:	875 262.5 Ben Barnow	875 700 Ben Barnowd	875 175 Ben Barnow O	0 875 175 Ben Barnow	Aworna 875 262.5 Ben Barnow A	875 262.5 Ben Barnow #	1Q745 320 Ben Barnow
0.40 Call with BS re outcome of meeting	0.50 Meeting with ES and BS	0.20 Discuss cost contribution with SH; sign off	0.30 Review/ consider email from JK re discovery	0.30 Review ES comments re memo on Illinois law; discuss with ES	0.20 Call with HZ re status	0.30 Review memo; discuss with ES; finalize	0.30 Emails to and from HZ re discovery and litigation approach; consider same	0.20 Emails with HZ re status	0.30 Emails re assignment; review, assign, respond	0.80 Discuss research re speaking with former employees; finalize; forward to counsel	0.20 Discussion with BS re case law	0.20 Emails to and from Jason W. re status with court	0.30 Review HZ email and attachments	0.30 Discuss potential cause of action with ES	0.40 Review response from SS; respond to same
7/12/2013	7/15/2013	7/30/2013	8/6/2013	8/8/2013	8/8/2013	8/9/2013	8/14/2013	8/15/2013	8/19/2013	8/19/2013	8/23/2013	9/11/2013	10/1/2013	10/2/2013	10/3/2013

10/5/2013	0.30 Emails to and from HZ re finalizing the consolidated complaint	875	262.5 Ben Barnov
10/9/2013	0.30 Discuss draft complaint with ES, SH, and JK	875	e: 1:1
10/10/2013	0.30 Status with ES re the consolidated complaint; email to HZ and JK re suggestions about how to finalize	875	2-CV-0
10/11/2013	0.20 Email from HZ re finalizing consolidated complaint; discuss with ES; respond to HZ's email re same	875	00 <mark>851</mark>
10/14/2013	0.30 Discuss complaint with ES	875	262.5 Ben Barnow
10/15/2013	0.20 Discuss status with ES	875	175 Ben Barnovo
7/15/2015	0.20 Email and call from defense counsel (Burke and Hicks)	875	#: 303
12/21/2016	0.30 Call from HZ and JK re developments in the settlement	875	262.5 Ben Barnow L
9/19/2017	0.10 Email to HZ re status conference	875	87.5 Ben Barnow
9/19/2017	0.30 Response from HZ re same and response to him	875	12/26/ Sess Ben Barnow 2.552
9/20/2017	0.10 Emails with HZ re call with court	875	23 Men Barnow 87.5 Ben Barnow
9/20/2017	0.40 Call with court and counsel	875	350 Ben Barnow
9/20/2017	0.30 Emails to and from HZ re upcoming meeting	875	262.5 Ben Barnow
12/12/2019	0.40 Call with HZ and ES re depositions and other assignments	875	350 Ben Barnowd
3/12/2013	0.40 Emails and calls from HZ re status of organizing with FL case	875	G Emourage 350 Ben Barnow
2/19/2013	0.70 Review ES and BS's comments/suggestions on settlement proposal; consider same	875	#: 612.5 Ben Barnow
3/24/2020	0.20 Inquiry as to settlement conference scheduling and status with HZ	875	74 <b>6</b> 00 Barnov

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1/3/2020	0.20 Review notice of death and stipulation of dismissal	700	140 Erich Schor
1/5/2020	Email from HZ regarding January 15 dep. prep. session in Geneva, IL, and deposition relating to same. Respond to same. Separate emails regarding Laskaris deposition 0.30 transcript and preparing a summary of same.	700	210 Erich Schor 200
1/6/2020	0.20 Emails re Laskaris deposition transcript and preparing summary of same	700	140 Erich Schor
1/8/2020	2.20 Emails re Laskaris deposition outline. Download transcript and review transcript. Begin preparing list of questions for future deposition prep. sessions.	700	1540 Erich Schor
1/9/2020	0.40 Review emails from co-counsel expressing thoughts re Laskaris's deposition testimony and strategy to prepare other plaintiffs for upcoming depositions. Research re same.	700	280 Erich Schor
1/9/2020	2.70 Prepare list of questions for future dep prep sessions	700	1890 Erich Schor
1/10/2020	2.20 Draft, revise, finalize and circulate memo containing	700	1540 Erich Schor <mark>EL</mark>
1/14/2020	0.30 Emails re tomorrow's dep prep session. Discuss with BB and AP.	700	210 Erich Schor
1/14/2020	1.70 Printout and review materials in preparation for tomorrow's dep prep session in Geneva, Illinois.	700	120 Erich Schor <mark>/5/7</mark>
1/15/2020	1.00 Travel to Geneva, Illinois, for plaintiff dep. prep session.	700	23 Page 200 Erich Schork
1/15/2020	5.80 Participate in dep prep session in Geneva, Illinois, along with HZ and SS.	700	4060 Erich Schork
1/15/2020	1.10 Travel from prep. session in Geneva, IL, to O'Hare Airport (drop HZ and SS) and then to home	700	770 Erich Schorb
1/16/2020	0.30 Emails to AH and HZ re Savannah, GA, dep prep session. Discuss schedule with BB.	700	210 Erich Schork
1/16/2020	0.30 Review Ltr. re discovery deficiencies circulated by AH and emails re same.	700	210 Erich Schor
1/17/2020	0.20 Emails to and from AH and HZ re Sunday's dep prep session.	700	140 Erich Schor <mark>k.</mark>
1/17/2020	0.50 Prepare and review materials for Sunday's dep prep session.	700	350 Erich Schor

5.40 Travel from Chicago to Savannah, GA, for tomorrow's plaintiff deposition prep session. Prepare for same. 3.50 Prepare for and participate in plaintiff dep prep with HZ. 3.80 Travel from Savannah, GA, to Chicago, IL. 6.00 Emails to and from co-counsel re today's plaintiff deposition. Next steps 0.20 Emails to and from co-counsel re today's plaintiff deposition. Next steps 0.20 Emails to and AH re status of Mickinney deposition ache dule (is the date confirmed, time, etc.). Review response to same. 3.50 Travel from Chicago to Savannah, GA, for tomorrow's deposition. Prepare for same. 3.70 Prepare for and attend Adam McKinney deposition. Email to 88 and AP re same. 0.20 Call with AM and HZ in preparation for tomorrow's deposition 0.20 Call with AM and HZ in preparation for tomorrow's deposition 0.20 Emails re next week's McKinley deposition in Savannah 0.20 Emails re next week's McKinley deposition in Savannah 0.20 Emails re tomorrow's prep call for the McKinnley deposition 0.20 Emails re tomorrow's prep call for the McKinnley deposition 0.20 Emails re sective potential payday loans case against Fifth Third; discuss with BS and SH; emails	Caston 3780 Erich Schorge:	700 2450 Erich Schorf:	700 2660 Erich Schor <mark>k A 2</mark>	Several discussions re same. Travel from Geneva Illinois to Home.  700 4200 Erich Schork	700 140 Erich Schor	me. 700 140 Erich Schork? :#	700 280 Erich Schor	700 2450 Erich Schor	590 Erich Schork	700 140 Erich Schor	700 140 Erich Schor	700 2450 Erich Schor <b>6</b>	700 140 Erich Schor <b>É</b>	Note that the Prich Schore Sch	700 2800 Erich Schord	1 Quota 200 200 200 200 200 200 200 200 200 20
1/18/2020 1/19/2020 1/19/2020 1/22/2020 2/23/2020 2/24/2020 2/24/2020 2/25/2020 2/25/2020 2/25/2020 2/25/2020 2/25/2020	5.40 Travel from Chicago to Savannah, GA, for tomorrow's plaintiff depositi			6.00 Travel to Geneva Illinois for plaintiff deposition. Prepare for, attend, plaintiff deposition.	0.20 Emails to and from co-counsel re today's plaintiff deposition. Next ste	0.20 Email to HZ and AH re status of MicKinney deposition schedule (is the	0.40 Emails with AH and HZ re Sunday's dep prep call and next week's dep	3.50 Travel from Chicago to Savannah, GA, for tomorrow's deposition. Prepare for	3.70 Prepare for and attend Adam McKinney deposition. Email to BB and AP re			3.50 Travel from Savannah, GA, to home	0.20 Emails re next week's McKinley deposition in Savannah		4.00 Research re potential payday loans case against Fifth Third; discuss with BS and SH; emails	0.80 Research; discuss potential action

7/30/2012	0.20 Discuss action with BB	200	140 Erich Schor
7/31/2012	0.60 Review draft complaint; discuss with BS and SH	200	6: 7:1
8/3/2012	0.60 Review and respond to emails re class definition; discuss with SH and BS	700	420 Erich Schor
9/20/2012	0.80 Discuss and make BBs edits to motion for extension of time; forward to co-counsel	700	260 Erich Schor
10/15/2012	0.20 Discuss venue and related matters with SH	700	140 Erich Schork
11/14/2012	0.20 Discuss Ohio statute and MTD with SH	700	140 Erich Schor
11/15/2012	0.20 Discuss MTD with BS and SH	200	140 Erich Schor
2/18/2013	2.50 Review email re potential settlement matrix; discussions with BB and BS re same	700	1750 Erich Schor
2/20/2013	3.00 Research emails and discussions re: potential settlement	700	2100 Erich Schor <mark>ồ</mark>
2/21/2013	0.80 Review and discuss settlement proposal with BB	700	12/ <mark>2</mark> 6/ 260 Erich Schor
3/13/2013	0.40 Discuss status with BB	700	23.Perich Schork
3/28/2013	0.20 Discuss status of litigation	700	140 Erich Schork
6/10/2013	2.00 Review and comment on draft reply in support of motion for appointment	700	1400 Erich Schor 2
6/13/2013	1.00 Proofread reply in support of appointment motion; discuss same with SH	700	700 Erich Schork
7/15/2013	0.50 Discuss meeting with judge with BB and BS	200	350 Erich Schork
8/8/2013	1.00 Review and comment on memo; discuss with BB	200	#:
8/9/2013	3.50 Review and comment on memo re Illinois law	700	2450 Erich Schor

10/2/2013	3.20 Research potential cause of action; discuss with BB; email re same	700	2240 Erich Schor
10/8/2013	2.50 Review, edit complaint	700	1750 Erich Schor
10/8/2013	0.30 Email with BS re complaint	700	210 Erich Schork
10/9/2013	3.00 Review, edit draft complaint; discuss with SH, BB, and JK; research re Ohio banking laws	700	2100 Erich Scho <mark>r 58</mark> 0
10/10/2013	2.00 Review, edit draft complaint; discussions with SH and BB re same	700	1400 Erich Schor
10/11/2013	0.40 Emails and discussions with BB; voicemail and email to JK	700	280 Erich SchorkO
10/14/2013	2.50 Review comments on amended consolidated complaint; voicemail for JK re same; discuss with BB	200	1750 Erich Schor
1/10/2014	0.40 Discuss opposition to MTD with SH	700	280 Erich Schor
1/17/2014	0.40 Discuss opposition with SH; send SH an email re same	700	280 Erich Schork:
1/20/2014	0.40 Discuss opposition with SH	700	280 Erich Schor <mark>/9</mark>
1/24/2014	0.40 Review opposition to MTD	700	280 Erich Schork
8/23/2016	0.40 Discuss status with AP	700	280 Erich Schor 99
3/7/2017	0.20 Review email from BB re settlement discussion; consider same	700	140 Erich Schor <b>c</b>
6/21/2019	0.20 Review motion for hearing	700	140 Erich Schor
8/5/2019	0.30 Review Amended Agreed Calendar Order; discuss status with BB	700	210 Erich Schor
10/30/2019	0.30 Review entry scheduling settlement conference by the court; discuss with BB	700	210 Erich Schor 210

12/17/2019	0.40 Call with BB and HZ re status of the case and preparing plaintiffs for deposition	700	280 Erich Schor
12/17/2019	1.60 Review documents provided by HZ, review operative complaint, answer and 6th Circuit decision	700	e: 1:10 Erich Schork
12/18/2019	1.30 Review materials in preparation for deposition prep. call; discuss with BB; emails re same	700	910 Erich Schor
12/18/2019	3.40 Call with co-counsel and Florida plaintiff re tomorrow's deposition	700	2380 Erich Schor800
12/18/2019	0.30 Emails with BB and HZ re pro hac motion; research local rules re same	700	210 Erich Schor
12/19/2019	0.20 Email to AH re status of plaintiff depositions; review response to same	700	140 Erich Schor
12/20/2019	0.70 Prepare and email motion for PHV admissions to S Scott; review response to same	700	490 Erich Schor
12/23/2019	0.20 Emails re pro hac vice application	700	140 Erich Schor <mark>s 1-8</mark>
10/15/2013	0.20 Discuss status with BB; review email from JK re complaint	700	140 Erich Schor <mark>d</mark>
3/24/2020	0.50 Review mediation demand letter. Consider same and discuss with BB. Discuss status of the settlement conference with BB. Emails to HZ re mediation demand letter.	700	320 Erich Schor
3/27/2020	0.20 Review order resetting settlement conference to a status conference. Discuss with BB.	700	140 Erich Schork
4/6/2020	0.10 Review the Court's minute entry. Discuss with BB.	700	30 Erich Schork
4/21/2020	1.00 Review class certification papers filed last night. Discuss with BB. Research re same.	700	7 of 51
6/3/2020	0.10 Review the Court's minute entry to today's status conference. Consider same.	700	70 Erich Schork
7/17/2020	0.50 Review D's opposition to class cert. Consider same.	700	350 Erich SchorE
7/21/2020	0.10 Discuss class cert. oppos. with BB and AP	700	70 Erich Schor <b>k</b> :#
8/11/2020	0.20 Review minute entry re scheduling settlement conference. Discuss with BB and AP.	700	140 Erich Schor Schor

9/3/2020	0.30 Review class cert. reply brief. Email to HZ re same.	700	210 Erich Schores:
9/24/2020	0.10 Review orders setting schedule for settlement conference with the judge.	700	1:12-
9/28/2020	0.20 Review response in opposition to D's motion for leave to file sur-reply in support of its opposition to PI's motion for CC.	700	140 Erich Schork NO.
11/23/2020	0.10 Discuss status with BB. Email HZ for update re same.	700	70 Erich Schor 20
12/17/2020	0.10 Discuss status with BB and AP.	200	VR Erich Schor
4/8/2021	0.20 Discuss status of the litigation (class cert order) and my withdrawal with HZ.	725	145 Erich Schork
	101 80		: 303-
7/24/2012	0.40 Review email and draft complaint from H.Z. re: potential new case against Fifth Third Bank; discuss same with S.H.	400	160 Blake Strau <del>l   S</del>
7/25/2012	1.20 Emails re: potential new case against Fifth Third Bank; discuss same with S.H. and E.S.; call to potential plaintiff re: similar case against US Bank	400	480 Blake Strautins
7/30/2012	1.00 Emails to and from co-counsel re: potential new case against Fifth Third Bank on early access Ioans; discuss same with S.H.	400	400 Blake Strau <b>9</b> 2
7/31/2012	Emails to and from co-counsel re: potential new case against Fifth Third Bank on early access loans; discuss same with S.H.; review article related to same; review S.H. 1.30 changes to draft complaint	400	520 Blake Straughs
8/1/2012	1.10 Emails to and from co-counsel re: potential new case against Fifth Third Bank on early access loans; discuss with E.S.	400	440 Blake Strau <mark>Cid</mark> s
8/2/2012	0.50 Emails to and from co-counsel re: potential new case against Fifth Third Bank on early access loans	400	200 Blake Strautis
8/3/2012	1.50 Emails to and from co-counsel re: finalization of complaint, class definition issues; discuss same with S.H. and E.S.	400	O Blake Strauts
8/22/2012	0.40 Discuss litigation, potential additional plaintiffs with S.H.; emails re: arbitration issues related to same	400	160 Blake Strauss
9/18/2012	Emails to and from co-counsel re: defendant's request for continuance, related litigation strategy and issues; download and review court's order re: case management 1.60 conference; emails with S.H. re: call with B.B. re: same; docket dates re: same	400	640 Blake Straugs

9/19/2012	0.90 Emails to and from co-counsel re: defendant's request for continuance, related litigation strategy and issues	400	360 Blake Strau <mark>tin</mark> s
9/25/2012	0.80 Download settlement agreement re: similar claims; circulate to co-counsel; emails to and from co-counsel re: same	400	320 Blake Strautius
9/28/2012	0.40 Emails to and from co-counsel re: scheduling of 26(f) conference	400	160 Blake Strau <mark>ti</mark> ns
10/8/2012	1.00 Emails re: settlement letter; discuss same with B.B.; make B.B.'s changes to same and circulate draft of same	400	400 Blake Strau
10/10/2012	Make changes to settlement letter; discuss same with B.B. and S.H.; circulate same to co-counsel; emails to and from co-counsel re: same, Rule 26(f) statement; finalize 3.00 letter and Rule 26(f) statement and send same to B.W.	400	1200 Blake Strauss
10/11/2012	1.60 Emails to and from co-counsel re: draft Rule 26(f) statement; finalize draft of same and email to defense counsel and co-counsel	400	640 Blake Strautins
10/12/2012	0.70 Emails to and from co-counsel re: venue issues; discuss same with S.H.	400	280 Blake Strau <mark>tio</mark> s
10/18/2012	0.40 Emails to and from co-counsel re: motions to excuse attendance at court hearing	400	160 Blake Strau <mark>cios</mark>
10/19/2012	0.40 Emails to and from co-counsel re: $26(f)$ report; discuss same with B.B.	400	160 Blake Strau
10/20/2012	0.50 Call with B.B. re: 26(f) report; emails re: same	400	200 Blake Strau <mark>ki</mark> /S
10/22/2012	0.80 Emails re: defendant's changes to Rule 26(f) report; review changes to same	400	320 Blake Strautins
10/25/2012	0.40 Discuss re: early access loans with B.B. and E.S.; review article related to same	400	60 Blake Strauths
11/14/2012	Emails to and from S.H. re: motion to dismiss briefing; conference call on same; discuss same with S.H.; review defendant's motion to dismiss; conference call with co-2.80 counsel re: same; review law related to same	400	1120 Blake Strauge 68
11/15/2012	1.00 Emails to and from co-counsel re: motion to dismiss; discuss same with S.H. and E.S.; review case law related to same	400	400 Blake Strautus
11/16/2012	2.00 Emails to and from co-counsel re: OH regulations, articles re: same; review same in relation to MTD; review case law related to same	400	800 Blake Strautus
11/20/2012	1.50 Review defendant's motion to dismiss; download and review case law and statutes cited in same	400	600 Blake Strau <mark>tins</mark>
11/21/2012	2.50 Review defendant's motion to dismiss, case law and statutes cited in same; draft response sections for same	400	2000 Blake Strauss

11/26/2012	2.50 Draft response sections to MTD; research case law related to same; emails to and from co-counsel re: same	400	COOO Blake Straughs
11/28/2012	3.00 Draft response sections to MTD; research case law related to same; emails to and from B.B. and S.H. re: same	400	1200 Blake Strau <mark>tis</mark> s
11/29/2012	2.00 Draft response sections to MTD; research case law related to same; review defendant's MTD; emails to and from co-counsel re: extension of time for response to MTD	400	800 Blake Strautins
12/3/2012	0.30 Email from D. Frech re: extension of time on response brief	400	98 120 Blake Strau <mark>tu</mark> s <b>7-</b>
12/7/2012	0.50 Emails re: response to motion to dismiss, related decisions in other cases; discuss response sections with S.H.	400	200 Blake Strau <mark>tigs</mark>
12/10/2012	1.60 Emails to and from co-counsel re: response brief on MTD, related legal and factual issues; draft sections of response brief to MTD and circulate to co-counsel	400	640 Blake Strau <mark>ti</mark> ns :#
12/13/2012	0.50 Emails to and from co-counsel re: response to MTD	400	200 Blake Strau
12/18/2012	0.60 Discuss filing of response to MTD with S.H.; download and review finalized ECF copy of same	400	240 Blake Strau <del>tin</del> s
1/24/2013	0.50 Emails re: new case cited by Fifth Third re: its MTD	400	200 Blake Strautins
1/29/2013	1.50 Emails to and from co-counsel re: surreply, B.B.'s PHV application; proofread B.B.'s PHV application	400	600 Blake Strades
1/30/2013	0.70 Emails to and from co-counsel re: surreply	400	280 Blake Strautus
2/6/2013	0.70 Discuss settlement issues with B.B. and S.H.; emails re: same, letter to Fifth Third investors; discuss same with B.B.	400	280 Blake Strauths
2/13/2013	0.80 Review and download copycat FL case; emails to and from B.B. and S.H. re: same	400	320 Blake Strau <mark>tin</mark> s
2/15/2013	1.00 Discuss settlement and litigation issues with B.B.; emails re: same	400	400 Blake StrauMs
2/16/2013	0.40 Emails with B.B. re: settlement issues	400	160 Blake Strautes:
2/17/2013	1.00 Emails re: settlement approaches; consider same	400	400 Blake Straugs

2/18/2013	2.80 Emails to and from co-counsel re: potential settlement proposals; call with S.H. re: same; consider same; discuss same with B.B. and E.S.	400	1120 Blake Strau <mark>ti</mark> ns S
2/20/2013	0.40 Emails to and from S.H. and E.S. re: settlement meeting	400	
2/21/2013	1.00 Discuss settlement issues with S.H., E.S., and B.B.; emails re: same; view related materials; review recent decision on cy pres distributions	400	400 Blake Strau <mark>th</mark> s
2/22/2013	0.30 Review B.B.'s settlement proposal	400	120 Blake Strau <b>600</b>
2/25/2013	0.40 Discuss with B.B. his settlement discussions with defense counsel	400	160 Blake Strau
2/26/2013	0.70 Discuss status of settlement talks with B.B.; emails to and from S.H. re: OCC rulings; consider same	400	280 Blake Straugus
3/5/2013	2.80 Discuss settlement letter with B.B.; draft letter directed by B.B. re: same; circulate letter to co-counsel; finalize letter for B.B.; email and mail same	400	.: 1120 Blake Strau <b>cio</b> s
3/28/2013	0.40 Discuss letter to plaintiffs' counsel with B.B. and S.H.; emails re: same; review letter	400	160 Blake Strau <mark>tu</mark> s
4/3/2013	0.40 Discuss upcoming status hearing, Fifth Thirds MTD FL complaint with S.H.	400	160 Blake Strauths
4/24/2013	0.50 Discuss motion for appointment with S.H.; proofread section of motion for S.H.	400	200 Blake Strau <mark>k/57</mark>
6/13/2013	0.30 Emails re: status hearing; discuss same with S.H.	400	120 Blake Strautins
6/27/2013	0.40 Emails to and from co-counsel re: call with Court; call with H.Z. re: same	400	160 Blake Straufins
6/28/2013	0.30 Review and docket order setting deadlines for next status conference and submissions	400	120 Blake Strauto
7/11/2013	Review reply brief in support of appointment of lead counsel; calls with B.B. re: same, status hearing with Court; discuss and lookup travel plans for B.B.; discuss same with 1.40 A.C.; print documents for B.B. for hearing	400	560 Blake Strautes
7/12/2013	0.40 Call with B.B. to discuss meeting with Judge re: appointment of lead counsel	400	160 Blake Strautus
7/15/2013	0.50 Meeting with B.B. and E.S. to discuss meeting with Judge re: appointment of lead counsel	400	200 Blake Strautius
7/19/2013	0.40 Emails to and from H.Z. re: lead counsel appointment work orders and related issues	400	20 160 Blake Strautas

8/19/2013	0.20 Discuss research re: former employees with B.B.	400	So Blake Straughs
8/20/2013	Emails to and from co-counsel re: various research issues consolidation of cases witness issues; docket next court telephonic hearing date; call with B.B. re: former 3.10 witness research issue; discuss same with S.H.; research	400	1240 Blake Strautis
8/21/2013	0.50 Draft motion to consolidate	400	200 Blake Strauths
8/22/2013	0.50 Emails to and from co-counsel re: memo on	400	200 Blake Strau <mark>Fis</mark> s
8/23/2013	2.00 Draft memo to all counsel re: law on process to the contract of the contr	400	800 Blake Strau <mark>gi</mark> s
8/27/2013	3.00 Emails to and from co-counsel re: motion to consolidate; discuss same with S.H.; research case law on consolidation; draft same; circulate draft to S.H.	400	00 1200 Blake Straufins ##
8/28/2013	1.50 Draft and finalize motion to consolidate; circulate draft to co-counsel; review H.Z.'s edits to same	400	600 Blake Strau
9/28/2013	0.20 Email from and to H.Z. re: checking with Stu as to settlement status	400	80 Blake Strau
10/3/2013	0.40 Emails re: status of settlement talks, amended complaint, MTD	400	160 Blake Strautins
10/5/2013	0.40 Emails re: amended complaint	400	160 Blake Straugs
10/8/2013	0.60 Emails to and from S.H. and E.S. re: amended complaint; discuss same with S.H. and E.S.	400	240 Blake Straugos
	73.10		e: 42
7/24/2012	0.20 Discuss potential case with B.S.	525	JO5 Sharon Hartis
7/24/2012	0.40 Discuss potential case with E.S. and B.S.	525	D Sharon Hara
7/30/2012	2.00 Call from J.K. re: potential case; reviewed draft complaint and researched issues; discuss with B.S.	525	1050 Sharon Harke
7/30/2012	Reviewed draft complaint; researched statutes and causes of action; suggested edits to draft complaint and made comments to same; discussed issues with B.S. and E.S.; 5.00 call with J.K. to discuss same and considered issues	525	2625 Sharon Hard

8/1/2012	1.00 Continued research issues and emailed J.K. re: same	525	525 Sharon Hang
8/1/2012	1.50 Considered email from D.F. and attached case and emailed re: whether to keep count in the complaint	525	787.5 Sharon Har <mark>ris</mark>
8/3/2012	Considered edits to complaint and the class definition issue; emailed B.S. and E.S. my thoughts re: same; discussed same with B.S. and E.S.; emailed J.K. and co-counsel our 2.50 position on class definition issue; researched issues; emailed with co-counsel re: other issues for complaint	525	13-12.5 Sharon Har <mark>th</mark>
9/25/2012	0.40 Reviewed memos on possible representative plaintiffs	525	210 Sharon Har <b>800</b>
9/28/2012	0.20 Emailed with co-counsel re: upcoming deadline for Rule 26 conference	525	105 Sharon Har
10/2/2012	Reviewed email from J.K. re: summary of issues to address on the call; conference call with co-counsel; Rule 26 conference with defense counsel; located court information 3.00 for A.C.; reviewed Ohio pro hac vice rules; emailed J.K. re: same and obtained sample motion; reviewed and docketed upcoming deadlines	525	B 1575 Sharon Hared
10/3/2012	0.50 Prepared letter and enclosures to Illinois Supreme Court clerk to get B.B.'s certificate of good standing	525	#: 262.5 Sharon Har <b>cis</b>
10/9/2012	0.80 Reviewed Rule 26 report and prepared redline of my edits; emailed B.B. re: same	525	420 Sharon Ha <b>r©</b>
10/9/2012	0.20 Reviewed draft settlement letter; reviewed B.B.'s email re: same; emailed B.B. re: same	525	105 Sharon Haras
10/10/2012	0.40 Reviewed emails between co-counsel re: draft letter re: discovery and settlement; emailed my edits to draft Rule 26 report	525	12/ <b>26</b> /
10/10/2012	0.40 Reviewed emails re: court order for briefing on venue; reviewed emails re: draft Rule 26 report	525	420 Sharon Harris
10/12/2012	0.50 Researched statistics on court dockets for the venue brief; emailed co-counsel re: same	525	262.5 Sharon Harris
10/12/2012	0.20 Discuss venue issue with B.S.	525	105 Sharon Har <b>49</b>
10/15/2012	2.80 Reviewed draft venue; researched US Court's statistics; discussed with E.S.	525	1470 Sharon Har <b>rs</b>
10/15/2012	1.00 Review revised draft venue brief and made edits and comments; incorporated B.B.'s edits; emailed to co-counsel	525	525 Sharon Hartis
10/16/2012	1.20 Reviewed revised venue brief and made edits and comments; incorporated B.B.'s edits; emailed to co-counsel	525	#: 630 Sharon Ha <b>ris</b>
10/17/2012	0.40 Revised motion to exclude parties per B.B.	525	210 Sharon Har

10/17/2012	0.20 Discuss proposed motion with B.B.	525	Casharon Hargs
10/18/2012	Prepared plaintiffs' motion to excuse attendance at CMC; calculated mileage and checked airfare for both plaintiffs; discussion with B.B. re: same; made edits to same; 3.00 emailed draft to co-counsel; follow-up to confirm facts and to make sure it gets filed today	525	1575 Sharon Hari
10/19/2012	0.20 Emailed with co-counsel re: report due on Monday	525	CO 105 Sharon Harris 0
10/22/2012	0.80 Prepared B.B.'s affidavit for his pro hac vice application; drafted motion re: same; emailed local counsel re: same	525	80 420 Sharon Har <b>tis</b> -
10/23/2012	Prepared a set of materials for B.B. for the upcoming case management conference; emailed S.S. about filing B.B.'s motion for pro hac admission; downloaded filings; 0.80 edited letter to S.S. enclosing check to reimburse them for filing fee for B.B.'s PHV	525	WSharon Hara
10/23/2012	0.30 Review order canceling the CMC and emails amongst co-counsel re: same; emailed and spoke with B.B. re: same	525	00 157.5 Sharon Hams ##
11/1/2012	0.40 Emailed with local counsel to obtain receipt number from filing B.B.'s PHV and registered for ECF in the ND of OH	525	210 Sharon Har
11/13/2012	0.40 Responded to email re: setting a conference call tomorrow to discuss FTB's MTD; emailed with B.S. re: same	525	210 Sharon Hara 519
11/14/2012	1.70 Reviewed motion to dismiss and had conference call with co-counsel re: same; discussed with B.S. and E.S.	525	892.5 Sharon Harris
11/15/2012	0.20 Discuss MTD with B.S. and E.S.	525	105 Sharon Har
11/28/2012	0.20 Emails with B.S. re: an extension	525	105 Sharon Hara
12/5/2012	0.40 Reviewed opinion sent by co-counsel; emailed B.S. re: status of the draft of his assigned section	525	210 Sharon Har
12/7/2012	0.20 Discuss legal theories with B.S.	525	105 Sharon Hare
12/13/2012	1.00 Began reviewing draft opposition to MTD	525	PAGE Sharon Haras
12/14/2012	2.00 Reviewed draft opposition and made redline of my edits	525	1050 Sharon Har
12/18/2012	0.20 Discuss with B.S. filing response brief	525	1 <b>@759</b>

1/15/2013	0.20 Emailed with J.K. re: the Rule 26 report	525	105 Sharon Harkig
1/16/2013	0.40 Reviewed draft discovery plan and emailed with J.K. and B.B. re: same	525	210 Sharon Har <b>is</b>
1/16/2013	0.40 Reviewed docket and called clerk re: whether another pro hac is needed	525	210 Sharon Hariffs
1/18/2013	0.40 Call from judge's clerk re: pro hac; prepared letter IL Sup. Ct. to get B.B.'s certificate of good standing	525	210 Sharon Har <b>800</b>
1/21/2013	1.00 Reviewed draft RFPs, ROGs and RFAs; emailed my redlines to co-counsel	525	525 Sharon Har <del>iy</del>
1/24/2013	0.20 Emailed J.K. re: forwarding documents; downloaded same	525	105 Sharon Hared
1/29/2013	4.00 Worked on B.B.'s PHV; reviewed draft surreply, considered same and reviewed pleadings; suggested edits and emailed re: same; reviewed draft and suggested edits	525	#: 2100 Sharon Har <b>cis</b>
1/30/2013	Reviewed emails and revised versions of draft surreply; considered same; emailed B.B. re: his PHV; reviewed SD of OH rules per B.B.; finalized and emailed motion and B.B. 2.50 certificated for co-counsel to file; downloaded filed documents and emailed A.C. re: reimbursing for PHV filing fee	525	<b>2.</b> 1312.5 Sharon Har <mark>cis</mark>
2/4/2013	0.40 Per order entering B.B.'s PHV; registered B.B. for ECF; changed password and settings	525	E 210 Sharon Harb
2/6/2013	0.20 Discuss settlement issues with B.S.	525	12/ <b>26</b> 105 Sharon Har <b>2</b> /
2/17/2013	Reviewed B.B.'s settlement proposal and considered same; reviewed complaint and early access terms, other settlement agreements and prepared email with suggestions 3.00 for settlement proposal	525	2/23 1575 Sharon Haris
2/18/2013	0.40 Call with B.S. to discuss potential settlement proposals	525	210 Sharon Harris
2/19/2013	0.50 Emails with co-counsel re: possible settlement proposal	525	262.5 Sharon Har <b>ts</b>
2/20/2013	0.20 Emails with B.S. and E.S. re: settlement meeting	525	105 Sharon Har <b>īg</b>
2/21/2013	0.60 Reviewed emails re: settlement of a similar issue and considered same; reviewed emails and attachments re: proposed settlement terms	525	315 Sharon Hart
2/21/2013	0.20 Discuss settlement issues with B.S.	525	#: 105 Sharon Harits
2/25/2013	0.40 Emails with co-counsel re: upcoming meeting with FTB	525	210 Sharon Har

2/26/2013	2.00 Reviewed emails from co-counsel re: strategy; researched isses and responded to B.B.'s questions	525	Caren Hargs
3/19/2013	1.00 Reviewed article per B.B. and considered application to our case; set up conference call and emailed defense counsel re: same	525	1. 1. 2.5 Sharon Haris
3/22/2013	0.40 Reviewed emails re: draft email to defense counsel and considered same	525	210 Sharon Hards
3/26/2013	0.20 Discussion with B.B.; emailed him the pending complaint	525	80 105 Sharon Har <b>FS</b>
3/28/2013	0.80 Per B.B., revised draft letter to FL plaintiffs' counsel and emailed to H.Z. and J.K.	525	420 Sharon Har <b>ra</b>
3/28/2013	0.40 Per B.B., called J.K. re: error in letter; per J.K., called B.W. to request he delete the letter	525	210 Sharon Harfis
3/29/2013	0.30 Discuss FL plaintiffs' counsel situation with B.B.	400	20 Blake Straus
4/3/2013	0.40 Emails with J.K., B.B. and group re: status conference tomorrow and call with co-counsel to discuss same	525	210 Sharon Har <del>işi</del>
4/25/2013	1.00 Reviewed B.B. email and revised motion for appointment and proposed order; emailed B.B. re: same; finalized drafts and emailed to H.Z. and J.K.	525	525 Sharon Harris
4/26/2013	0.40 Email from J.K. attaching revised draft motion for appointment and proposed order; reviewed same; emailed B.B.'s resume to J.K.	525	210 Sharon Har
4/30/2013	Reviewed emails from B.B. re: question about recomment of the filed motion for final approval and court opinion and responded to B.B.'s question; suggested 1.00 language for motion for appointment; downloaded from ECF the filed motion and exhibit	525	525 Sharon Har <mark>d</mark> O
5/2/2013	1.50 Call with B.B. re: reviewing drafts; reviewed draft second amended complaint and motion for leave to file; emailed proposed edits to J.K. and rest of co-counsel	525	.: 787.5 Sharon Har
6/4/2013	0.40 Downloaded and reviewed opposition to our motion for appointment	525	o 210 Sharon Har衛
6/7/2013	1.50 Review draft letter to attorney Owing and made edits per B.B. to same	525	A 787.5 Sharon Har
6/12/2013	6.00 Reviewed pleadings and worked on reply in support of our appointment motion; drafted section per B.B.'s dictation	525	3150 Sharon Har
6/13/2013	Research cases and work on draft reply in support of appointment motion; revised draft per edits and comments from E.S.; email with co-counsel re: the status conference 6.00 this morning and whether the judge stayed all filings; discuss same with B.B.	525	3150 Sharon Haron 3150

6/18/2013	2.00 Call with B.B.; emailed with co-counsel re: strategy; drafted motion for leave to file a reply to our appointment motion; revised per J.K. and circulated again	525	1050 Sharon Hanig
7/10/2013	0.20 Discussed with B.B. our reply in support of appointment motion	525	6: 105 Sharon Har <mark>ris</mark>
7/10/2013	0.30 Emailed co-counsel my edits to reply and the word version of proposed order	525	257.5 Sharon Hares
7/10/2013	0.30 Reviewed co-counsel's emails re: Laskaris group's proposal	525	157.5 Sharon Har <b>800</b>
7/11/2013	0.60 Downloaded our filings and printed materials for B.B. for tomorrow's status conference; emailed re: same	525	315 Sharon Har
7/31/2013	0.30 Draft letter to S.S. enclosing check for firm's litigation fund contribution; finalized and mailed	525	157.5 Sharon Har
8/20/2013	0.20 Discuss former witness research issue with B.S.	525	#: 105 Sharon Har <b>G</b>
8/23/2013	0.50 Review draft memo and discuss with B.S.	525	262.5 Sharon Har <b>g</b>
8/27/2013	0.20 Discuss with B.S. drafting a motion to consolidate	525	105 Sharon Har <mark>ga</mark>
8/28/2013	0.60 Reviewed draft motion for consolidation and emailed B.S. suggested edits and additions	525	315 Sharon Har <mark>6</mark>
10/8/2013	0.30 Review emails re: amended complaint; discuss same	525	23.2 Sharon Harris
10/9/2013	0.30 Discussion with B.B., E.S., and J.K. re: draft complaint	525	157.5 Sharon Har
10/10/2013	0.30 Discuss complaint with E.S.	525	257.5 Sharon Harb
10/16/2013	0.40 Download and review amended consolidated complaint and compare to our proposed edits	525	210 Sharon Har <b>rg</b>
1/2/2014	2.00 Download motion to dismiss documents; reviewed same and discussed with E.S.	525	1050 Sharon Hart
1/8/2014	2.00 Researched issues and worked on drafting response to assigned sections	525	1050 Sharon Hartis
1/20/2014	6.00 Reviewed brief; researched cases; made edits and included explanatory comments where necessary	525	3150 Sharon Harh

3/30/2015	1.50 Review opinion; per B.B., review TILA statutory language and research case law re: damages under TILA; email B.B. re: same	525	C Sparon Hars 787.5 Sharon Hars
4/28/2015	0.40 Review motion for reconsideration and FTB's answer	525	210 Sharon Harris
4/30/2015	0.40 Review docket for information on status conference and discussed with B.B.	525	210 Sharon Harry
8/13/2015	0.40 Checked docket for status and email E.S. and J.B. re: same	525	210 Sharon Har <mark>G5</mark>
10/15/2015	0.40 Review docket for upcoming status call and discuss with A.C.; review order and docket new date	525	210 Sharon Har
9/18/2012	0.20 Emails with B.S.	525	105 Sharon Haffis
4/24/2013	6.00 Worked on motion for appointment of counsel and summary of B.B.'s cases for same; drafted proposed case management order	525	3150 Sharon Har
	100.70		13 File
9/21/2021	0.20 Research into status of the case, emails with AP	250	ed: 12
9/30/2021	0.20 Review Defendant's motion to bifurcate the case	250	50 Riley Princ
10/22/2021	0.20 Reviewed response to motion to bifurcate	250	50 Riley Prince
2/7/2022	0.10 Status with B.B. and A.P.	425	42.5 Riley Prince 8
1/18/2023	0.10 Review order and docket	475	47.5 Riley Princ <b>65</b>
	0.80		PAGEID #: 10763

# **Exhibit C**

# JARNOW AND ASSOCIATES' ITEMIZED COSTS AND EXPENSES

	BARNOW AND ASSOCIATES' ITEMIZED COSTS AND EXPENSES	EXPENSES	
Туре	Date Description	Billable (\$) User	Expense category
ExpenseEntry	9/30/2012 Westlaw Pro usage charges (research)	66.75 Erich Schork	Westlaw
ExpenseEntry	9/30/2012 Expedited delivery	16.76 Erich Schork	Postage/FedEx
ExpenseEntry	9/30/2012 Photocopying/Scans/Fax	4.75 Erich Schork	External printing/copying/binding
ExpenseEntry	9/30/2012 June 1 - Sept. 30, 2012 Westlaw Pro usage charges (research)	396.81 Erich Schork	Westlaw
ExpenseEntry	10/2/2012 Conference call	7.06 Erich Schork	Conference Calls
ExpenseEntry	10/3/2012 Certificate of Good Standing for B.B.	1 Erich Schork	Filing/Court Fees
ExpenseEntry	10/23/2012 Expenses related to travel for court hearing in Cleveland	100 Erich Schork	General Travel
ExpenseEntry	10/23/2012 Filing fee for the motion for PHV of B.B.	100 Erich Schork	Pro Hac Vice
ExpenseEntry	1/31/2013 PHV for B.B S.D. Ohio	200 Erich Schork	Pro Hac Vice
ExpenseEntry	3/19/2013 Conference call	6.56 Erich Schork	Conference Calls
ExpenseEntry	5/29/2013 Westlaw Research - May 2013	22.17 Erich Schork	Westlaw
ExpenseEntry	7/12/2013 Travel expense to Cincinnati, OH for hearing (mileage 594.60 x \$056.5 per mile)	335.95 Erich Schork	Transportation
ExpenseEntry	7/12/2013 Parking in Cincinnati for hearing	11 Erich Schork	Transportation
ExpenseEntry	7/12/2013 Gasoline - hearing in Cincinnati	76.01 Erich Schork	Transportation
ExpenseEntry	7/31/2013 Westlaw Research - July 2013	46.13 Erich Schork	Westlaw
ExpenseEntry	8/31/2013 Westlaw Research - Aug. 2013	501.54 Erich Schork	Westlaw
ExpenseEntry	10/31/2013 Westlaw Research - Oct. 2013	516.27 Erich Schork	Westlaw
ExpenseEntry	2/28/2014 Westlaw Research - Sept. 2013 - Feb. 2014	254.91 Erich Schork	Westlaw
ExpenseEntry	4/30/2015 PACER	1.9 Erich Schork	PACER
ExpenseEntry	6/30/2015 PACER	1.9 Erich Schork	PACER
ExpenseEntry	8/31/2015 PACER	1 Erich Schork	PACER
ExpenseEntry	10/31/2015 PACER	1 Erich Schork	PACER
ExpenseEntry	5/31/2019 PACER - May 2019	0.2 Erich Schork	PACER
ExpenseEntry	6/30/2019 PACER - June 2019	3.3 Erich Schork	PACER
ExpenseEntry	12/12/2019 Westlaw Research - Dec. 2012	45.71 Erich Schork	Westlaw
ExpenseEntry	12/31/2019 PACER - Dec. 2019	8.4 Erich Schork	PACER
ExpenseEntry	1/2/2020 Pro hac vice Admission fee for ES	200 Erich Schork	Filing/Court Fees
ExpenseEntry	1/18/2020 Uber from Savannah Airport to Westin	27.64 Erich Schork	Transportation
ExpenseEntry	1/18/2020 Hotel (includes one meal)	261.77 Erich Schork	Hotel
ExpenseEntry	1/18/2020 Round trip airfare (Chicago to Savannah) for dep. prep. session	628 Erich Schork	Transportation
ExpenseEntry	1/19/2020 Uber from location where dep. prep. session was held to Savannah airport	17.11 Erich Schork	Transportation
ExpenseEntry	1/19/2020 Uber from my hotel to location where dep. prep. session was held	12.11 Erich Schork	Transportation
ExpenseEntry	1/19/2020 Uber from Chicago O'Hare airport to home	26.31 Erich Schork	Transportation
ExpenseEntry	2/23/2020 ES flight from Chicago to Savannah for McKinney deposition (round trip)	836.8 Erich Schork	Transportation
ExpenseEntry	2/23/2020 Uber from airport to hotel	22.29 Erich Schork	Transportation
ExpenseEntry	2/24/2020 Hotel in Savannah for McKinney deposition	139.51 Erich Schork	Hotel
ExpenseEntry	2/24/2020 Uber from deposition location to airport	23.04 Erich Schork	Transportation
ExpenseEntry	2/24/2020 Uber from airport to home	22.2 Erich Schork	Transportation
ExpenseEntry	6/23/2020 April 2020 PACER quarterly invoice	6.1 Riley Prince	PACER
ExpenseEntry	10/1/2020 September PACER charges	0.1 Riley Prince	PACER

ExpenseEntry 4/29/2021 PACER ExpenseEntry 6/29/2021 PACER ExpenseEntry 7/14/2022 Pacer C	11/17/2020 January 2020 Pacer Invoice	12.6 Riley Prince PAC	PACER
	ER charges January-March 2021	3.2 Riley Prince PAC	PACER
	6/29/2021 PACER charges - April 2021 - June 29, 2021	3.4 Riley Prince PAC	PACER
	7/14/2022 Pacer Charges - 4/1/22-6/30/22	0.1 Riley Prince PAC	PACER
•	4/11/2023 PACER Charges - 1/1/23 - 3/31/23	2.3 Riley Prince PAC	PACER
ExpenseEntry 7/21/2023 PACER	ER charges April 1, 2023 - June 30, 2023	0.1 Riley Prince PAC	PACER
		4971.76	

# EXHIBIT 12

### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

	) CASE NO. 1:12-CV-00851
In re: Fifth Third Early Access Cash	)
Advance Litigation	) HON. MICHAEL R. BARRETT
	)

### **DECLARATION OF FRANCIS J. "CASEY" FLYNN, JR.**

- I, Francis J. "Casey" Flynn, Jr., hereby declare as follows:
- 1. I am over the age of eighteen years and not a party to the action herein. I make this Declaration of my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
- 2. I am admitted and licensed to practice law in the States of California, Illinois, and Missouri.
- 3. I am an attorney with the law firm of Consumer Protection Legal, LLC. I submit this declaration in support of my firm's motion for an award of attorneys' fees and in connection with services rendered in this case.
- 4. From the moment we became involved in this case, we undertook considerable risk that despite our significant investment of time and effort we would never receive any payment from our prosecution of this action as we were retained on a contingency fee basis and we knew that Fifth Third would devote significant resources to this litigation, which included hiring aggressive and skilled attorneys who were providing a tenacious defense to this case. We also knew that prevailing and ultimately collecting any recovery from Fifth Third was never anywhere near certain, especially in light of the significant issues regarding the legal viability of plaintiffs' claims, whether plaintiffs would be able to obtain the necessary discovery and evidence to support those claims, whether the case would be certified, and whether we would prevail on summary judgment and/or at trial. We accepted and proceeded with this litigation in the face of this uncertainty, agreeing to undertake this litigation on a wholly contingent basis and thereby initiating complex, lengthy litigation, with no guarantee of compensation for the significant amount of time

and effort that we were prepared to and did invest to prosecute this case.

5. By pursuing this litigation and devoting the significant resources that this litigation required, we necessarily had to forego developing and working on as many other cases available to us as we otherwise could have.

### I. WORK UNDERTAKEN

- 6. Before initiating any action, Class Counsel conducted a thorough investigation of the claims, both legal and factual. Specifically, we thoroughly investigated and researched the claims, which allowed Class Counsel to better evaluate the factual claims regarding the allegations against Defendant. In summary, we undertook the following assignments: client retention work; investigation of claims; interviewing potential class representatives; drafting complaints; effecting service; meetings and strategizing regarding organizational structure; research and writing assignments and analyzing statutory and common law; analyze Plaintiff's bank statements; research and writing related to TILA violations; work related to responding to written discovery requests; work with clients re: gathering documents; client deposition preparation and client deposition; work regarding damage analysis; analysis of strength of class representatives claims and strength of defendant's defenses; client communications and updates.
- 7. This work was done either (a) prior to the appointment of Jason Whittemore as Interim Co-Lead Counsel or (b) after Jason Whittemore was appointed Interim Co-Lead Counsel and later Co-Lead Counsel in consultation with him or done at his request after his respective appointments.
- 8. Furthermore, at the direction of Lead Counsel, we removed any time that was clearly not TILA related. For example, Plaintiff's fee application does not include any hours expended after the Court issued its Order on Summary Judgment on TILA. Plaintiffs fee application does not include any hours solely attributable to researching issues related to usury, DIDA, home state v. host state research, and the like.

### II. TIMEKEEPING AND CALCULATION OF LODESTAR

9. As of March 29, 2023, the below timekeepers collectively devoted 263.60 hours of

professional time to the prosecution of this action. At their then current reasonable and regular hourly billing rates, this equates to a lodestar of \$239,154.80.

Name	Years of Practice	Time Spent	Current Rate	Lodestar
Francis J. "Casey" Flynn, Jr.	21	122.80	\$997.00	\$122,431.60
Tiffany M. Yiatras	18	140.80	\$829.00	\$116,723.20
TOTAL:		263.60		\$239,154.80

- 10. The above tables were prepared from contemporaneous time records that are regularly prepared and maintained by my firm and are maintained electronically. I have reviewed these time records in order to confirm their accuracy.
- 11. Attached hereto as **Exhibit A** is a true and accurate copy of the detailed time records indicating the time spent by Tiffany Marko Yiatras and Francis J. "Casey" Flynn, Jr. who have been involved in this litigation from case inception through March 29, 2023 as set forth in the detailed time records. The lodestar calculation is based on the attorney's current billing rates.
- 12. The practice of both myself and the attorneys with Consumer Protection Legal, LLC is to record time in tenth of an hour increments, and to do so contemporaneously. This method of recording time is more accurate than recording time by quarter hour increments, which tends to inflate the amount of time billed for short telephone conferences and other short tasks.
- 13. The hourly rates identified above are the same as the regular current rates charged for non-contingent matter and/or which have been accepted in other litigation, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.
- 14. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.
- 15. I am the attorney who oversaw the work performed by Tiffany M. Yiatras. In my experience, the number of hours devoted to the assignments in this case are well within the range of hours that reasonably would be expected under the circumstances based on the amount of investigation required relative to the issues presented in this action.

### III. EVIDENCE IN SUPPORT OF REASONABLENESS OF RATES

- A. Tiffany Marko Yiatras and Francis J. Flynn, Jr. Have a Lengthy History of Representing Consumers, An Extensive Experience Litigating Complex Actions, Have Achieved Significant Recoveries On Behalf Of Consumers, and Whose Rates Have Been Determined to Be Reasonable by Courts in the Past.
- 16. The above hourly rates used to calculate lodestar for the work done in prosecuting this action are their respective current reasonable and regular rates commensurate with the experience and expertise of each attorney who actively worked on this case.
- 17. Since as early as 2011, Tiffany M. Yiatras and/or I have been appointed to leadership positions in numerous complex consumer class actions and, upon resolving the matters, have been awarded fees based on hourly rates deemed to be reasonable.
- 18. The following are some examples of recent (2011-2023) class actions that we have litigated as proposed Class Counsel, Class Counsel, Co-Lead Counsel, members of a Court appointed Steering Committee, or Co-Counsel to the aforementioned and awarded our then-current reasonable hourly rates at the time of submission:
- a. In *Mc-K Sales Inc., et al. v. Discover Financial Services, Inc. et al.*, Case No. 1:10-cv-2964-RWG (N.D. Ill.) (nationwide litigation involving Discover's marketing and sales practices related to a merchant membership program):

Years in Practice	Reasonable Rate Approved:
11	\$475.00
6	\$375.00

b. In *In re: Discover Payment Protection Plan Marketing and Sales Practices Litigation*, MDL No. 2217, Case No. 1:10-cv-06994-JWD (N.D. III.) (May 10, 2012) (Dkt. 179) (nationwide litigation involving Discover's marketing and sales practices related to its debt suspension/debt cancellation products and other add on products):

Years in Practice	Reasonable Rate Approved:
11.8	\$600.00
6.8	\$500.00

c. In *In re Bank of America Credit Protection Marketing & Sales Practices Litig.*, Case No. 3:11-md-2269-THE (N.D. Cal.) (January 16, 2013) (Dkt. 96) (nationwide litigation

involving Bank of America's marketing and sales practices related to its debt suspension/debt cancellation products):

Years in Practice	Reasonable Rate Approved:
12	\$600.00
7	\$500.00

d. In *Esslinger, et al. v. HSBC Bank Nevada, N.A., et al.*, Case No. 2:10-cv-03213-BMS (E.D. Pa.) (November 20, 2012) (Dkt. 140) (nationwide litigation involving HSBC's marketing and sales practices related to its debt suspension/debt cancellation products):

Years in Practice	Reasonable Rate Approved:
12	\$600.00
7	\$500.00

e. In *Hive, L.C., d/b/a The Hive, et al. v. Aspen Waste Systems of Missouri, Inc.*, Case No. 1322-CC00872-SRO (22nd Circuit Court, City of Saint Louis, Missouri) (March 10, 2015) (Dkt. Entry dated 3/10/2015) (class action against Aspen Waste Management of Missouri's regarding its practice of charging customers an overweight charge based on the use of unregulated scales that was resolved by way of class settlement that was preliminarily and finally approved in the City of St. Louis):

Years in Practice	Reasonable Rate Approved:
14.5	\$650.00
9.5	\$550.00
7.5	\$400.00

f. In *Tucker v. Papa Johns' International, Inc., et al.*, Case No. 16-L-49-AM (Circuit Court for the Third Judicial Circuit of Illinois (Madison County, Illinois) (October 14, 2016) (Dkt. Entry dated 10/14/2016) (state court class action against Papa John's International, Inc. regarding its practice of improperly charging sales tax on delivery fees to Illinois residents that was resolved in a class settlement that was preliminarily and finally approved in Madison County, Illinois):

Years in Practice	Reasonable Rate Approved:
16	\$600.00
10	\$550.00
8	\$400.00

g. In Jones, et al. v. First Quality Enterprises, Inc., et al., 2:14-cv-06305-LDW-ARL

(E.D.N.Y.) (February 28, 2018) (Dkt. 78) (nationwide class action litigation regarding Defendants' marketing and sales practices related to a variety of potentially contaminated disposable wipes):

Years in Practice	Reasonable Rate Approved:
17	\$717.00
12	\$717.00
10	\$717.00

h. In *Griggs v. Walgreen Co., d/b/a Walgreens, et al.*, Case No. 11-L-0685 (Circuit Court for the Twentieth Judicial Court (St. Clair County, Illinois) (November 7, 2018) (Dkt. Entry dated 11/7/2018) (state court class action against Walgreen Co., d/b/a Walgreens regarding its practice of overcharging for a copy a customer's pharmacy records that resulted in a class settlement that was preliminarily and finally approved in St. Clair County, Illinois):

Years in Practice	Reasonable Rate Approved:
18	\$742.00
13	\$742.00

i. In *Torres, et al. v. Wendy's International LLC*, Case No. 6:16-cv-210-PGB-DCI (M.D. Fla.) (February 26, 2019) (Dkt. 157) (nationwide class action relating to Data Breach):

Years in Practice	Reasonable Rate Approved:
18	\$700.00
13	\$700.00
11	\$700.00

j. In in *Culbertson et al v. Deloitte Consulting LLP*, Case No. 1:20-cv-03962-LJL (SDNY) (consolidated group of actions against Deloitte regarding a data security incident resulting in a class action settlement in which fees were approved on February 26, 2022):

Years in Practice	Reasonable Rate Approved:
15	\$747.00
20	\$747.00
16	\$759.00
21	\$759.00

k. *In re: TikTok Inc. Data Privacy Litigation*, Case No. 3:20-cv-00457 (ILND) (privacy matter resulting in a \$92 million dollar class action settlement in which fees were approved on August 22, 2022):

Years in Practice	Reasonable Rate Approved:
17	\$759.00
22	\$919.00

## B. The Fees Requested Are Reasonable in Light of Rates Awarded to Similarly Situated Attorneys in Other Class Action Cases by Courts Across the Country.

The rates charged by Tiffany M. Yiatras, Francis J. Flynn, Jr., and Corey D. Sullivan are reasonable and well within the range of rates charged by comparably qualifying attorneys for comparably complex work. Comparable hourly rates have been found reasonable in numerous cases, including the following authority and/or survey:

a. In *Pantelyate, et al, v. Bank of America, N.A.*, et al., Case No. 1:16-08964-AJN (January 31, 2019) (Dkt. 116), in which the Court awarded the fee application, with a 4.88 multiplier, in of attorneys whose rates were as follows:

Title	Billable Rate
Senior Partners	\$850
Partner	\$675
Associate	\$475
Associate	\$475
Associate	\$450

- b. In *Eck v. City of Los Angeles*, Case No. BC577028 (Los Angeles Superior Court 2018) (\$243 million California Propositions 26 and 218 cases regarding allegedly illegal tax on electricity usage where the Court awarded Class Counsel's full request of approximately \$15 million based on percentage of the fund method and the same hourly rates (Court's Order and underlying pleading available upon request);
- c. Williamson, et al. vs. McAfee, Inc., Case No. 5:14-cv-00158-EJD (N.D. Cal. Feb. 15, 2017) (Dkt. 118; \$85 Million settlement in deceptive auto renewal case); Chimeno-Buzzi v. Hollister Co., Case No. 1:14-cv-23120-MGC (S.D. Fla. April 11, 2016) (Dkt. No. 155) (TCPA case);
- d. *West v. ExamSoft Worldwide Inc.*, Case No. 1:14-cv-22950-UU (S.D. Fla. October 9, 2015) (Dkt. No. 62; \$2.1 Million Settlement in Bar Exam Testing case).
- e. *Cotter et al. v. Lyft, Inc.*, Case No. 13-cv-04065-VC (N.D. Cal.), Order Granting Final Approval of Settlement Agreement, filed March 16, 2017 (Dkt. No. 310), a class action against Lyft alleging Lyft underpaid its drivers by classifying them as independent contractors, in

which the court approved the percentage-based fee award requested by plaintiffs based on the following hourly rates:

Class	Rate
1996	\$800
2010	\$500
2014	\$325

f. National Federation of the Blind of California v. Uber Technologies, Inc., Case No. 14-cv-04086 NC (N.D. Cal.), Order Granting Final Approval and Attorneys' Fees, filed December 6, 2016 (Dkt. No. 139), a class action against Uber alleging that it violated federal antidiscrimination laws by allowing its drivers to refuse to accept service dogs, in which the court found the following 2016 hourly rates reasonable:

Class	Rate
1980	\$900
1985	\$895
1997	\$740
2005	\$645
2010	\$475
2011	\$460
2014	\$355

g. *Wynn v. Chanos*, 2015 WL 3832561(N.D. Cal. 2015), filed June 19, 2015, an anti-SLAPP fee award, in which the court found the following hourly rates reasonable:

	<u> </u>
Years of Experience	2015/2014 Rates
40	\$1085/1035
35	\$750
20	\$920/875
6	\$710/\$645
4	\$640/\$570

h. *Gutierrez v. Wells Fargo Bank, N.A*, 2015 WL 2438274 (N.D. Cal. 2015), filed May 21, 2015, an unfair business practices class action, in which the court found the following hourly rates reasonable (before applying a 5.5 multiplier):

Year of Bar Admission	Rate
1972	\$975
1989	\$850
2001	\$625
2006	\$435

2009	\$435
2013	\$370

i. *Banas v. Volcano Corp.*, 3:12-cv-01535-WHO (N.D. Cal.), Order Granting in Part and Denying in Part Volcano's Motion for Attorneys' Fees and Costs, filed December 12, 2014, a dispute over a merger agreement decided on summary judgment, in which the court found the following hourly rates reasonable:

Level	Rate
Partners and associates	\$355-1,095

- j. *McAllister v. The St. Louis Rams, LLC*, Case No. 4:16-cv-00172-SNLJ (E.D. Mo.) (June 24, 2019) (Dkt. 405), where the majority of attorneys on the class action case billed out at \$650.00/hour, the Court held that the fees requested were "fair and reasonable, considering the amount made available to the Class under the Settlement Agreement and the results obtained by Class Counsel; the contingent nature of the fees; the novelty and difficulty of the issues involved in the case; the experience, reputation and ability of the attorneys; awards in similar cases; the time and work required; and the preclusion of other employment by the attorneys due to acceptance of the case."
- k. *In Re Ashley Madison Customer Data Security Breach Litigation* (MDL 2669), 4:15-md-02669-JAR (E.D.MO) (November 20, 2017) (Dkt. 383), fee petition seeking \$3,733,333.33 in attorneys' fees for 3,692.9 hours of work. \$3,733,333.33 / 3,692.9 corresponds with an average hourly rate of \$1,010.94).
- 1. *In re: Stericycle, Inc., Steri-Safe Contract Litigation* (MDL 2455), 1:13-cv-05795 (N.D. III.) (March 8, 2018) (Dkt. 382), a nationwide breach of contract class action litigation, the Court awarded \$35,000,000.00 in attorneys' fees (a 3.50 multiplier) for 19,783 hours of work, which had produced \$9,984,303.50 in total lodestar value at current and reasonable hourly rates,

### which included the following:

Position	Rate
Partner	\$950
Partner	\$735
Partner	\$735
Partner	\$683
Partner	\$650
Partner	\$605
Partner	\$600
Partner	\$550
Partner	\$525
Partner	\$550
Associate	\$473
Associate	\$473
Associate	\$400

I declare under penalty of perjury that the foregoing declaration is true and correct to the best of my knowledge.

Executed this 30th day of August, 2023 in Los Angeles, California.

/s/ Francis J. "Casey" Flynn, Jr.
FRANCIS J. "CASEY" FLYNN, JR.

# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

	) CASE NO. 1:12-CV-00851
In re: Fifth Third Early Access Cash	)
Advance Litigation	) HON. MICHAEL R. BARRETT
	)

DETAILED TIME SUBMISSION OF CONSUMER PROTECTION LEGAL, LLC FROM INCEPTION OF CASE THROUGH MARCH 29, 2023

[INCLUDES REDACTIONS]

Date of Work Performed	Firm Name	Timekeeper Name	Timekeeper Title	Detailed Time Entry	Number of Hours Expended	TimeKeeper Rate	Lodestar
4/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Meeting with Steve Owings re potential class action idea	0.20	\$829.00	\$165.80
4/4/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Teleconference with co-counsel re: potential class action	0.20	\$829.00	\$165.80
4/5/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Follow up with co-counsel re pre-filing documentation	0.10	\$829.00	\$82.90
4/8/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review materials about deceptive practice case, discuss same with attorneys.	0.90	\$997.00	\$897.30
4/9/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Discussion with Tiffany including strategy	0.30	\$997.00	\$299.10
4/24/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to email from Janet Fyock regarding Fifth Third Early Access Cash Advance litigation	0.10	\$829.00	\$82.90
4/25/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review Fyock case and have meeting with attorneys about research and drafting class action complaint.	1.00	\$997.00	\$997.00
4/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Draft General Class Action Litigation Agreement and Duties Form and Cover Letter in anticipation of potential new client calls	0.40	\$829.00	\$331.60
4/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Janet Fyock regarding postponing call, respond thereto	0.10	\$829.00	\$82.90
4/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Janet Fyock with contact number; calendar scheduled phone call; respond to email from Janet Fyock confirming call	0.20	\$829.00	\$165.80
4/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Janet Fyock; Respond to email from Janet Fyock rescheduling call and giving her my cell phone number. Ask Tom Partyka to forward call to my cell phone in the event she calls my direct dial.	0.10	\$829.00	\$82.90
4/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Law 360 Article regarding Cash Advance Loans; Email to Steve Owings regarding article and provide status on client retention in the Illinois area	0.20	\$829.00	\$165.80
4/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Waiting for Janet Fyock to call; emailing Janet Fyock to remind her of her call; research regarding	0.30	\$829.00	\$248.70
4/26/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and draft class action complaint including	6.30	\$997.00	\$6,281.10
4/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Drafting of Initial Complaint	1.10	\$829.00	\$911.90
4/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock again regarding scheduling a new time to discuss her case	0.10	\$829.00	\$82.90
4/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock to schedule a new time to discuss her case	0.10	\$829.00	\$82.90
4/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email list of questions to Janet Fyock; provide litigation packet and agreements to Janet Fyock	0.60	\$829.00	\$497.40

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4/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Meeting with Josh Reznick regarding Fifth Third Case and	0.70	\$829.00	\$580.30
4/29/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and draft class action complaint including	5.30	\$997.00	\$5,284.10
4/29/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock to	0.10	\$829.00	\$82.90
5/2/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Follow up with Janet Fyock	0.10	\$829.00	\$82.90
5/3/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and draft class action complaint.	6.50	\$997.00	\$6,480.50
5/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review client email	0.10	\$829.00	\$82.90
5/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review client email; resend requested documentation	0.10	\$829.00	\$82.90
5/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review litigation agreements signed by Janet Fyock; respond to questions from Janet Fyock; notify Steve's group of the status; email Casey regarding assignment relating to Janet Fyock's Complaint	0.40	\$829.00	\$331.60
5/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review the information Janet Fyock emailed to me; summarize client's facts to internal team and email suggested time frame for filing complaint;	0.50	\$829.00	\$414.50
5/4/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional complaint work – inserting additional causes of action; email Casey to have him handle the fact section an	1.30	\$829.00	\$1,077.70
5/4/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional drafting of complaint	0.80	\$829.00	\$663.20
5/5/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and draft class action complaint.	5.50	\$997.00	\$5,483.50
5/5/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference with Casey; have him research	0.30	\$829.00	\$248.70
5/6/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Finalize complaint.	1.50	\$997.00	\$1,495.50
5/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Add Case Number to Pleadings; E-file complaint and civil cover sheet	0.30	\$829.00	\$248.70
5/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional Complaint drafting research and work —	2.20	\$829.00	\$1,823.80
5/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research regarding draft and send email summarizing findings to Steve's Group and Casey and Corey	0.70	\$829.00	\$580.30

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5/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Brent Walker's email regarding strategy; review Steve's email regarding filing; and send email regarding scheduling a strategy call; take steps necessary to obtain a case number from the SDIL clerk of court; scheduling of conference call on May 7, 2013.	0.40	\$829.00	\$331.60
5/7/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Call with larger group.	0.50	\$997.00	\$498.50
5/7/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Strategy meeting with attorneys, check to	1.00	\$997.00	\$997.00
5/7/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with Steve Owings regarding reaching out to Jasper regarding have Corey contact Jasper regarding the same; Research regarding location of Kentucky Fifth Third Bank locations	0.90	\$829.00	\$746.10
5/7/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference call with Steve's Group at 10:00am Central	0.50	\$829.00	\$414.50
5/7/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email	2.40	\$829.00	\$1,989.60
5/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Edit JonesWard's initial draft of Kentucky complaint; draft email with findings and reasoning introduce Jasper to Steve's group and provide a copy of the recently filed complaint.	3.00	\$829.00	\$2,487.00
5/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email to O'Malley regarding status of summons and whether we should follow up	0.10	\$829.00	\$82.90
5/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to email from Jasper regarding strategy related to	0.10	\$829.00	\$82.90
5/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jasper regarding Tennessee complaint; inquire regarding	0.20	\$829.00	\$165.80
5/10/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Steve Owings regarding strategy related to	0.20	\$829.00	\$165.80
5/10/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Have Corey call SDIL to find out why the Fifth Third Summons hasn't been issued	0.10	\$829.00	\$82.90
5/10/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Interview of potential Illinois Plaintiff; have Tom send out Litigation Packet Letter and Class Action Litigation Agreements, email team summary of grievances	0.70	\$829.00	\$580.30
5/10/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Notify Steve's group that Jasper's Tennessee complaint is on file; provide deadline to respond to Motion for Interim Lead Counsel	0.10	\$829.00	\$82.90
5/10/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Steve's Response to my email and respond with another email regarding strategy relating to	0.30	\$829.00	\$248.70
5/13/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference call regarding strategy	0.20	\$829.00	\$165.80
5/13/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Follow up with regarding potential case	0.10	\$829.00	\$82.90
5/14/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review,	2.80	\$997.00	\$2,791.60

5/14/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Coordinate service	0.20	\$829.00	\$165.80
5/14/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Steve and Jasper's email regarding strategy regarding	0.20	\$829.00	\$165.80
5/14/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Steve Owings email regarding strategy related to	0.20	\$829.00	\$165.80
5/16/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Meeting with Corey; Set up conference call with Steve Owings; Conference call with Steve Owings regarding	0.30	\$829.00	\$248.70
5/18/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Find and send copies of complaints to Steve Owings	0.40	\$829.00	\$331.60
5/20/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Discuss strategy with Tiffany on send email.	0.50	\$997.00	\$498.50
5/20/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Motion to Stay and provide respond to Jasper and	0.50	\$829.00	\$414.50
5/20/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Steve's email and respond regarding strategy regarding	0.20	\$829.00	\$165.80
5/20/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Send case style to Steve's group regarding	0.10	\$829.00	\$82.90
5/21/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference with Process Server regarding serving at different location	0.20	\$829.00	\$165.80
5/23/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Correspondence regarding strategy regarding correspondence regarding	0.10	\$829.00	\$82.90
5/24/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Prepare for and conference call with court.	0.80	\$997.00	\$797.60
5/24/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review and discuss attorney's	0.80	\$997.00	\$797.60
5/24/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Summary of Conference Call with Court; email regarding strategy related to potential MDL Motion	0.20	\$829.00	\$165.80
5/29/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review	0.10	\$829.00	\$82.90
5/30/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Meeting with Casey regarding strategy regarding confirming plan	0.30	\$829.00	\$248.70
5/30/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Shareholder Proposal	0.30	\$829.00	\$248.70
5/30/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Steve's letter to groups; Research regarding insertion of case information; additional edits; etc.; Review billing protocol, make case specific edits; call with Casey regarding	2.80	\$829.00	\$2,321.20
5/31/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional edits to letter	0.70	\$829.00	\$580.30
5/31/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference regarding electronically file executed summons with SDIL	0.40	\$829.00	\$331.60

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5/21/2012	C P. C L LIIC	TICC MANY	01. D		0.10	0020.00	\$82.90
5/31/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Send email regarding upcoming conference and include current drafts of letter and protocol to larger group	0.10	\$829.00	7-2
6/3/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research	0.80	\$997.00	\$797.60
6/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research regarding Steve with findings	1.90	\$829.00	\$1,575.10
6/10/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review status of case, transfer.	0.40	\$997.00	\$398.80
6/11/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Discuss transfer with Fifth Third Attorney, grant extension.	0.30	\$997.00	\$299.10
6/12/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Check with opposing counsel about	1.00	\$997.00	\$997.00
6/12/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Correspondence and calls with Fifth Third about transfer.	0.20	\$997.00	\$199.40
6/12/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Litigation strategy conference with Steve, Jason, Casey, Corey, and Jasper	0.60	\$829.00	\$497.40
6/13/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Conference call regarding strategy related to	0.50	\$997.00	\$498.50
6/13/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Strategy meeting about Fifth Third conference call, research	0.50	\$997.00	\$498.50
6/13/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference call	0.50	\$829.00	\$414.50
6/13/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference call regarding strategy related to	0.40	\$829.00	\$331.60
6/13/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Strategy call regarding with Jasper Ward	0.40	\$829.00	\$331.60
6/17/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review correspondence; provide suggestion regarding strategy related to	0.20	\$829.00	\$165.80
6/18/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review Jasper's	0.30	\$997.00	\$299.10
6/18/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Correspondence with Casey Flynn regarding	0.10	\$829.00	\$82.90
6/21/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Correspondence about	0.30	\$997.00	\$299.10
6/21/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Revise Proposed Order for Joint Transfer of Venue; meeting with Tiffany regarding	0.80	\$997.00	\$797.60
6/21/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Edit Proposed Order for Joint Transfer of Venue; meeting with Casey regarding correspondence with Jasper regarding Tennessee filing and making the change for that motion.	1.40	\$829.00	\$1,160.60
6/21/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review motion for lead counsel filed by Hassan's group	0.30	\$829.00	\$248.70
6/24/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Conference with Defense Counsel regarding Transfer of Venue; discuss matter with Tiffany.	0.40	\$997.00	\$398.80

Construct Procession Light LLC   Triflary N Yames   0.1 Parton   Confiscence with Definite Counsel signaturing in State of Venues, Update group regarding motions required in State of Venues and proposed order   0.20   0.52 (100   0.50   0								
Canamer Presistion Legal, LLC   Tillian M, Yistins   Ol. Partner   California Micros for Jam Trainfer of Venue, earal proposal codes   O.30   S829.00   S328.70	6/24/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner		0.30	\$829.00	\$248.70
Consumer Protection Legal, LLC   Turflary M. Yistrus   O. Partner   Research repaiding how to sells attachment not already intached; Call with court clerk   O. 0   \$355.00   \$331.00	6/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with court clerk; E-file attachments	0.20	\$829.00	\$165.80
Consumer Protection Legal, LLC   Triflary M. Yintras   O. Partner   Conference call regarding strategy related to   0.30   5397 to   5398 to   5234 for   6272013   Consumer Protection Legal, LLC   Triflary M. Yintras   O. Partner   Conference call regarding strategy related to   0.30   5387 to   5398 to   5334 for   6272013   Consumer Protection Legal, LLC   Triflary M. Yintras   O. Partner   Conference call regarding strategy related to   0.30   5397 to   5997 to   5997 to   6272013   Consumer Protection Legal, LLC   Triflary M. Yintras   O. Partner   Conference call regarding strategy related to   0.40   5329 to   5333 for   6272013   Consumer Protection Legal, LLC   Triflary M. Yintras   O. Partner   Conference call regarding strategy related to   0.40   5329 to   5333 for   6272013   Consumer Protection Legal, LLC   Triflary M. Yintras   O. Partner   Conference call reporting strategy related to   0.40   5329 to   5333 for   6329 to   6	6/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	E-file Joint Motion for Joint Transfer of Venue; email proposed order	0.30	\$829.00	\$248.70
	6/25/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research regarding how to e-file attachment not already attached; Call with court clerk	0.40	\$829.00	\$331.60
Consumer Protection Legal, LLC   Francis J. "Case," Flynn, Jr.   Ol. Parmer   Conference call regarding strategy valued to   including follow-up discussions   1.00   5997.00   5997.00	6/26/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Conference call regarding	0.30	\$997.00	\$299.10
Consumer Protection Legal, LLC   Francis J. "Casey" Flynn, Jr.   O1. Partner   Review Hassan Zavecr's email and other pleadings   1.00   5997.00   5997.00   5997.00   627.2013   Consumer Protection Legal, LLC   Tiffany M. Yiatrus   01. Partner   Review email from Hassan Zavacr's email and other meeting with Corey Sullivan, set up conference call   0.60   5829.00   5819.74   627.2013   Consumer Protection Legal, LLC   Tiffany M. Yiatrus   01. Partner   Review email from Hassan Zavacr's email and other meeting with Corey Sullivan, set up conference call   0.60   5829.00   5819.74   6282.01   6282.013   Consumer Protection Legal, LLC   Tiffany M. Yiatrus   01. Partner   Consumer Protection Legal, LLC   Francis J. "Casey" Flynn, Jr.   01. Partner   Dictate changes to Tiffany and review letter, send letter to group.   1.00   5997.00   5899.00   58	6/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference call regarding strategy related to	0.30	\$829.00	\$248.70
Consumer Protection Legal, LLC   Tiffany M. Yiatras   Ol. Partner   Conference call regarding strategy related to   O.40   \$82.900   \$331.60	6/27/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Conference call regarding strategy related to including follow-up discussions.	1.00	\$997.00	\$997.00
Consumer Protection Legal, LLC   Tiffany M. Yiatras   Ol. Partner   Review steve's email from Hassan Zavarei and order; meeting with Corey Sullivan; set up conference call   0.60   \$829.00   \$497.40	6/27/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review Hassan Zaverei's email and other pleadings	1.00	\$997.00	\$997.00
Consumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Tiffany M. Yintras O1. Partner Censumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Censumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Censumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Censumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Censumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Consumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Conference with Casey Flynn dictating changes to current draft of letter in accordance with Jasper's additional suggestions, Look up Plaintiff Linison counsel language for Casey to insert in letter to Judge Barrett Tiffany M. Yintras O1. Partner Conference with Casey Flynn dictating changes to current draft of letter in accordance with Jasper's additional suggestions, Look up Plaintiff Linison counsel language for Casey to insert in letter to Judge Barrett Tiffany M. Yintras O1. Partner Tiffany M. Yintras O1. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett Onsumer Protection Legal, LLC Tiffany M. Yintras O1. Partner Travel to Louisville/Cincinnanti for conference and review pleadings for meeting with other Plaintiff's counsel And Judge Barrett Travel to Louisville/Cincinnanti Travel to Louisville/Cincinnanti Consumer Protection Legal, LLC Travel to Louisville/Cincinnanti Travel	6/27/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference call regarding strategy related to	0.40	\$829.00	\$331.60
Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 101. Partner Revise letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to the court and make edits.  Draft proposed letter to Judge Barrett. Take original proposal to full entire to Judge Barrett. Take original proposed to feed to first proposal to full entire to Judge Barrett. Take original proposal to full entire to Judge Barrett. Take original proposed to feed to first proposal to full entire to Judge Barrett. Take original proposal to full entire to Judge Barrett. Take original proposal to f	6/27/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Hassan Zavarei and order; meeting with Corey Sullivan; set up conference call	0.60	\$829.00	\$497.40
Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner email group for suggested edits / comments 0.70 \$829.00 \$558.30 \$997.00	6/27/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Steve's email in anticipation of	0.10	\$829.00	\$82.90
7/8/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Revise letter to Judge Barrett  Conference with Casey Flynn dictating changes to current draft of letter in accordance with Jasper's additional suggestions; Look up Plaintiff Liaison counsel language for Casey to insert in letter to Judge Barrett; Provide additional changes to Casey for incorporation  7/8/2013 Consumer Protection Legal, LLC Tiffany M. Yiatras Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. Ol. Partner Incorp	6/28/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner		0.70	\$829.00	\$580.30
Consumer Protection Legal, LLC Tiffany M. Yiatras O1. Partner Suggestions; Look up Plaintiff Liaison counsel language for Casey to insert in letter to Judge Barrett; Provide additional changes to Casey for incorporation  T/8/2013 Consumer Protection Legal, LLC Tiffany M. Yiatras O1. Partner Incorporate Jasper's suggestions into draft proposal to Judge Barrett  O.40 S829.00 S331.60  Travel to Louisville/Cincinnati for conference and review pleadings for meeting with other Plaintiff's counsel and Judge Barrett  Travel to Louisville/Cincinnati for conference and review pleadings for meeting with other Plaintiff's counsel and Judge Barrett  Travel to Louisville/Cincinnati for conference and review pleadings for meeting with other Plaintiff's counsel and Judge Barrett and Conference with other attorneys, travel back from Louisville/Cincinnati.  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. O1. Partner Review the proposed Case Management Order and make edits.  Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. O1. Partner Review the Case Management Order, discuss same with Tiffany.  O50 S997.00 S498.50	7/8/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Dictate changes to Tiffany and review letter, send letter to group.	1.00	\$997.00	\$997.00
Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner suggestions; Look up Plaintiff Liaison counsel language for Casey to insert in letter to Judge Barrett; Provide additional changes to Casey for incorporation 0.40 \$829.00 \$331.60 \$331.	7/8/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Revise letter to Judge Barrett	1.00	\$997.00	\$997.00
7/11/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner And Judge Barrett.  7/12/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Active Planting with co-counsel, meeting with Judge Barrett and conference with other attorneys, travel back from Louisville/Cincinnati.  7/15/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the proposed Case Management Order and make edits.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the proposed Case Management Order and make edits.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.	7/8/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	suggestions; Look up Plaintiff Liaison counsel language for Casey to insert in letter to Judge Barrett; Provide	1.10	\$829.00	\$911.90
Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner and Judge Barrett.  7/12/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Louisville/Cincinnati.  7/15/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the proposed Case Management Order and make edits.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the proposed Case Management Order and make edits.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany.	7/8/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Incorporate Jasper's suggestions into draft proposal to Judge Barrett	0.40	\$829.00	\$331.60
7/15/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Louisville/Cincinnati. 8.00 \$997.00 \$7,976.00  7/15/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the proposed Case Management Order and make edits. 2.00 \$997.00 \$1,994.00  7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany. 0.50 \$997.00 \$498.50	7/11/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner		5.30	\$997.00	\$5,284.10
7/16/2013 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review the Case Management Order, discuss same with Tiffany. 0.50 \$997.00 \$498.50	7/12/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner		8.00	\$997.00	\$7,976.00
	7/15/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review the proposed Case Management Order and make edits.	2.00	\$997.00	\$1,994.00
7/16/2013 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review and respond to Jason Whittemore email regarding 0.10 \$829.00 \$82.90	7/16/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review the Case Management Order, discuss same with Tiffany.	0.50	\$997.00	\$498.50
	7/16/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Jason Whittemore email regarding	0.10	\$829.00	\$82.90

7/16/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review the proposed Case Management Order; Review emails from Casey Flynn and Jason Whittemore regarding Case Management Order No. 1 suggested edits; Provide requested language; make edits;	1.60	\$829.00	\$1,326.40
7/17/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore regarding Proposed Order No. 1; respond regarding	0.30	\$829.00	\$248.70
7/18/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review discuss same with Tiffany, compare with BOA.	0.30	\$997.00	\$299.10
7/18/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and edit draft billing protocol; provide in email regarding	0.90	\$829.00	\$746.10
7/19/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review transfer order discussing same with Tiffany, inquire about pro hac	0.30	\$997.00	\$299.10
7/19/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review court order; email team regarding fact of transfer; email regarding strategy related to pro hac vice motions, etc.	0.20	\$829.00	\$165.80
7/23/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Memorandum of Law regarding	5.80	\$829.00	\$4,808.20
7/23/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research Supreme Draft letters requesting Certificates of Good Standing from Illinois	1.50	\$829.00	\$1,243.50
7/24/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Draft Pro Hac Vice Motions for Casey, Corey, and Tiffany; Have Tom send out requests letters requesting Certificates of Good Standing with checks;	1.40	\$829.00	\$1,160.60
7/25/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and Draft Fifth Third Memorandum regarding	4.50	\$997.00	\$4,486.50
7/26/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and Draft Fifth Third Memorandum regarding	6.50	\$997.00	\$6,480.50
7/28/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research and Draft Fifth Third Memorandum regarding	1.80	\$997.00	\$1,794.60
7/29/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Revise and shepardize caselaw regarding	3.50	\$997.00	\$3,489.50
7/29/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional work regarding memorandum regarding  Ask Casey to Shepardize caselaw and	0.40	\$829.00	\$331.60
7/29/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Draft Notice of Appearance for Penny Unkraut Hendy and Ronald E. Johnson; additional work drafting Motions for Pro Hac Vice; email cover letter with attachments to Penny Unkraut Hendy outlining what steps need to be taken;	0.90	\$829.00	\$746.10
7/29/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Jasper Ward regarding strategy related to Consolidated Complaint and new client	0.10	\$829.00	\$82.90
7/30/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Finalize memo regarding Illinois common law and statutory claims.	2.50	\$997.00	\$2,492.50
7/31/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Coordinate payment of MDL Fee	0.10	\$829.00	\$82.90
8/1/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review of pro hac vice	0.30	\$997.00	\$299.10
8/1/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Jones Ward to see whether they have pro hac'd in yet and if they would like a copy of our forms to use as a template for Jasper's admission pro hac vice.	0.10	\$829.00	\$82.90

8/2/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Email to Lead Counsel regarding assignment	0.10	\$829.00	\$82.90
8/5/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Confirm case has not been opened in Southern District of Ohio yet; and respond to Penny Hendy's email	0.10	\$829.00	\$82.90
8/7/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Jasper's email regarding potential class representative or potential witness, including a description of what protections need to be taken regarding confidentiality	0.10	\$829.00	\$82.90
8/8/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research and review	0.50	\$829.00	\$414.50
8/12/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Alex Davis' question regarding pro hac vice rules.	0.10	\$829.00	\$82.90
8/14/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Obtain assessment check and draft letter to enclose with assessment check; ask Stuart Scott for a W9 form.	0.30	\$829.00	\$248.70
8/16/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Provide defense attorney information	0.10	\$829.00	\$82.90
8/19/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Jason Whittemore, informing him that the Fyock case has transferred	0.10	\$829.00	\$82.90
8/28/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Fill out registration forms for CM/ECF in the SDOH	0.30	\$829.00	\$248.70
8/28/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Prepare letter enclosing check and have Tom mail out	0.20	\$829.00	\$165.80
9/3/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Casey to forward brief so that I can have a teleconference with Jasper regarding consistency in memoranda	0.10	\$829.00	\$82.90
9/5/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research regarding questions posed by Lead Counsel	0.90	\$829.00	\$746.10
9/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with client and questionnaire work	1.00	\$829.00	\$829.00
9/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Memorandum work	0.2	\$829.00	\$165.80
9/6/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research regarding	1.30	\$829.00	\$1,077.70
9/8/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Supplemental Memo work	2.40	\$829.00	\$1,989.60
9/8/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Supplemental Memo work	0.20	\$829.00	\$165.80
9/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Supplemental Memo work	0.20	\$829.00	\$165.80
9/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Supplemental Memo work	1.20	\$829.00	\$994.80
9/9/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Supplemental Memo work	0.80	\$829.00	\$663.20
9/10/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference with Casey regarding strategy related to	0.30	\$829.00	\$248.70
9/12/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Conference with co-counsel regarding strategy related to	0.30	\$829.00	\$248.70
9/16/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Jason Whittemore email	0.30	\$829.00	\$248.70

9/16/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Research and analysis of draft emails regarding the same	2.10	\$829.00	\$1,740.90
9/24/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to email from lead counsel regarding conference call regarding strategy relating to	0.10	\$829.00	\$82.90
9/26/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Alex Owings' email; conference with Casey Flynn	0.40	\$829.00	\$331.60
9/27/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Casey's email; conference with Casey	0.20	\$829.00	\$165.80
9/30/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Lead Counsel's email; teleconference with Casey Flynn regarding the same	0.40	\$829.00	\$331.60
10/1/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Jason Whitmore Email regarding strategy related to what counts to plead	1.90	\$829.00	\$1,575.10
10/1/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Work related to drafting individual fact section for Janet Fyock;	0.80	\$829.00	\$663.20
10/2/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason's emails to Co-Lead; meeting with Casey; review relevant pleadings; researching  Draft fact Section for Janet Fyock; Review email from Jason Whittemore regarding his conversation with Co-Lead regarding	3.30	\$829.00	\$2,735.70
12/10/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Fifth Third, discuss with Tiffany availability to work on Motion to Dismiss and pleadings	0.20	\$997.00	\$199.40
12/12/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email to Co-Lead Counsel advising of availability to work on Motion to Dismiss and review response thereto	0.10	\$829.00	\$82.90
12/19/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore regarding division of labor	0.10	\$829.00	\$82.90
12/19/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore; Diary teleconference	0.10	\$829.00	\$82.90
12/20/2013	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Looking at Defendant's pleadings, talk with Tiffany, conference with group regarding responsive pleading and assigned sections	1.00	\$997.00	\$997.00
12/20/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Pre-meeting with Casey; Conference with group regarding responsive pleading and assigned sections	0.40	\$829.00	\$331.60
12/30/2013	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore resetting internal deadlines for response to Fifth Third Motion to dismiss	0.10	\$829.00	\$82.90
1/6/2014	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research case law and draft sections for Fifth Third's motion to dismiss.	2.90	\$997.00	\$2,891.30
1/6/2014	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research case law and draft sections for Fifth Third's motion to dismiss.	5.30	\$997.00	\$5,284.10
1/6/2014	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Fact Section; respond to Alex Davis' question regarding email regarding respond to Jasper's email regarding	6.90	\$829.00	\$5,720.10
1/7/2014	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Additional research, distinguish Fifth Third's cases, draft sections for Fifth Third's motion to dismiss.	3.40	\$997.00	\$3,389.80
1/7/2014	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Research case law and draft sections for Fifth Third's motion to dismiss.	2.50	\$997.00	\$2,492.50

1/7/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Casey's Section 0.20 \$829.00 \$829.00 \$1/8/2014 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Research case law and draft sections for Fifth Third's motion to dismiss. 0.50 \$997.00 \$997.00 \$1/9/2014 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Research case law and draft sections for Fifth Third's motion to dismiss. 0.50 \$997.00 \$997.00 \$1/9/2014 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Research case law and draft sections for Fifth Third's motion to dismiss. 0.50 \$997.00 \$997.00 \$1/9/2014 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Research case law and draft sections for Fifth Third's motion to dismiss. 0.50 \$997.00 \$997.00 \$1/9/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Work on Motion to Dismiss 0.50 \$829.00 \$1/9/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Finalize sections. 0.50 \$997.00 \$1/9/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Fact Section to Jason Whittemore 0.10 \$829.00 \$1/13/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Fact Section to Jason Whittemore 0.10 \$829.00 \$1/13/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Fact Section to Jason Whittemore 0.10 \$829.00 \$1/13/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Work on distinguishing cases; review emails regarding 0.50 \$829.00 \$1/13/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Work on distinguishing cases; review emails regarding 0.50 \$829.00 \$829.00 \$1/13/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Work on distinguishing cases; review emails regarding 0.50 \$829.00 \$829.00 \$1/13/2014 Consumer Protection Legal, LLC Work on distinguishing cases; review emails regarding 0.50 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.00 \$829.	\$5,184.40 \$165.80 \$165.80 \$3,988.00 \$3,489.50 \$2,891.30 \$5,084.70 \$6,797.80 \$2,492.50 \$82.90
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1/17/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Work on distinguishing cases; review emails regarding 7.00 \$829.00	
	\$3,389.80
1/19/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Plaintiff's Response in opposition to Motion to Dismiss 2.10 \$829.00	\$5,803.00
	\$1,740.90
5/9/2014 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email to Jason Whittemore regarding Fifth Third and broaching the subject of settlement with Fifth Third 0.30 \$829.00	\$248.70
8/14/2014 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review email exchange between Jasper and Jason W. regarding status of 0.10 \$997.00	\$99.70
4/27/2015 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review email from Jason Wagner regarding Motion for Consideration 0.10 \$997.00	\$99.70
4/29/2015 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review email from Jason Wagner regarding Fifth Third reaching out to discuss 0.10 \$997.00	\$99.70
8/19/2015 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review email from Jason on status of 0.10 \$997.00	\$99.70
10/8/2015 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review email from Jason on status of and reply thereto 0.10 \$997.00	\$99.70
11/14/2015 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Forward information to Jason Whittemore about settlement of another Fifth Third case 0.20 \$829.00	\$165.80
1/6/2016 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Review correspondence from Jason regarding status of and letter sent to Judge Barrett 0.10 \$997.00	\$99.70
7/23/2016 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Tell co-counsel I will follow up with Lead regarding a question about status of case 0.10 \$829.00	\$82.90
7/26/2016 Consumer Protection Legal, LLC Francis J. "Casey" Flynn, Jr. 01. Partner Respond to Jason Whittemore's email regarding 0.10 \$997.00	

7/26/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with Jason Whittemore about status of Fifth Third	0.10	\$829.00	\$82.90
7/26/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Jason about status of Fifth Third case	0.10	\$829.00	\$82.90
7/27/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review the email from Jason regarding the status of the Fifth Third case	0.10	\$829.00	\$82.90
9/15/2016	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review update from Jason Whittemore and reply thereto	0.10	\$997.00	\$99.70
9/15/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason regarding status of	0.10	\$829.00	\$82.90
9/21/2016	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review settlement update from Jason Whittemore	0.10	\$997.00	\$99.70
9/21/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason's email regarding Fifth Third's acceptance of	0.10	\$829.00	\$82.90
9/26/2016	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review update from Jason Whittemore	0.10	\$997.00	\$99.70
9/26/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason's email regarding details of an initial his request that we notify our class representatives of	0.10	\$829.00	\$82.90
10/6/2016	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Review Tiffany's email regarding reaching out to named plaintiff about	0.10	\$997.00	\$99.70
10/6/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Provide Casey with summary of and the contact information of our class representative and request that he can contact the client per Jason's request.	0.10	\$829.00	\$82.90
10/12/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Contact named plaintiff regarding specifically about the status of request updated contact information, and confirm with Jason that the client has been	0.30	\$829.00	\$248.70
10/12/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason regarding whether we have reached out to our client regarding	0.10	\$829.00	\$82.90
10/13/2016	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Jason regarding his inquiry as to the name of our particular client	0.10	\$829.00	\$82.90
9/21/2017	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review e-mail regarding and strategy related thereto	0.10	\$829.00	\$82.90
11/13/2017	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with Jason Whittemore regarding	0.20	\$829.00	\$165.80
11/13/2017	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	E-mail Francis J. "Casey" Flynn, Jr. and Corey regarding and appeal being necessary	0.20	\$829.00	\$165.80
12/13/2017	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review e-mail from Jason Whittemore regarding setting up a call for an update and discussion related to strategy	0.10	\$829.00	\$82.90
12/13/2017	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Strategy call with Jason Whittemore and others at 2:00 PM via telephone period	0.30	\$829.00	\$248.70
5/28/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review text from Jason Whittemore indicating that Fifth Third Appeal was reversed	0.10	\$829.00	\$82.90

5/28/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore attaching 5/3 Breach of Contract order reversing bad decision.	0.10	\$829.00	\$82.90
8/4/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Reach out to Jason Whittemore regarding upcoming deadlines in 5/3 matter, namely 26(a)(1) disclosures by August 30, 2019 and	0.30	\$829.00	\$248.70
8/5/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to email from Jason Whittemore responding to email regarding 26(a)(1) disclosures and advising to move forward with respect to working with Janet Fyock	0.10	\$829.00	\$82.90
8/20/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore regarding discovery requests served by Fifth Third on Janet Fyock and and respond thereto, confirming that  Also, offer to help others where needed.	0.10	\$829.00	\$82.90
8/22/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore outlining	0.10	\$829.00	\$82.90
8/22/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Reach out to Janet Fyock via email to provide an update on the case and to set a call to discuss	0.30	\$829.00	\$248.70
8/23/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Text Janet Fyock to advise her to	0.10	\$829.00	\$82.90
8/23/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Francis J. "Casey" Flynn, Jr. Janet Fyock's telephone number and emergency number to	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Janet Fyock's text that	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Forward original email regarding case update and setting up call to discuss convenience to Janet Fyock's new email address, etc.	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review ail that she can talk in afternoon during her commute from work to home about her case and and respond thereto.	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional communication with Janet Fyock regarding matter.	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with Janet Fyock to discuss discovery requests	0.50	\$829.00	\$414.50
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Jason Whittemore regarding question related to	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock a copy of the request for documents so that she can do a reasonable and diligent search for documents and advise regarding	0.10	\$829.00	\$82.90
8/26/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Prepare	2.90	\$829.00	\$2,404.10

8/27/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Janet Fyock indicating that she will do a reasonable and diligent search on August 28th because she is very busy and respond thereto	0.10	\$829.00	\$82.90
8/27/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional preparation of	1.70	\$829.00	\$1,409.30
8/27/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review e-mail from Jason Whittemore indicating that he is taking the position that	0.10	\$829.00	\$82.90
8/29/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore about call with Hassan and Stu to discuss	0.10	\$829.00	\$82.90
8/29/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Send email to Janet Fyock and the duty to preserve all responsive emails; and asking Janet to	0.20	\$829.00	\$165.80
8/29/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner		0.10	\$829.00	\$82.90
9/11/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Draft email to 5/3 team requesting information on logistics of	0.20	\$829.00	\$165.80
9/11/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Draft email to Alex Davis asking status of	0.20	\$829.00	\$165.80
9/12/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore indicating responses to my questions regarding loans and indicating that he will forward on information to Stu.	0.10	\$829.00	\$82.90
9/13/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Jason Whittemore and Arelys McQuade the EA Account summary and thanking them for the extra time given	0.10	\$829.00	\$82.90
9/16/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Janet Fyock regarding and Forward additional documents of Janet Fyock to Jason Whittemore and Arelys McQuade	0.10	\$829.00	\$82.90
9/16/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock, notifying her that I submitted her additional document to Jason Whittemore and reminding her to	0.20	\$829.00	\$165.80
9/16/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Janet Fyock's response regarding searching for additional documents and	0.10	\$829.00	\$82.90

Poly 2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review email from Arelys McQuade attaching declarations regarding Interrogatories for Janet Fyock's signature 0.10 \$829.00 \$829.00 \$9/19/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Janet Fyock's response and notify Arelys McQuade and Jason Whittemore regarding that Janet Fyock 0.10 \$829.00 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Forward finalized copies of Interrogatory Answers to Janet Fyock Fyock 0.10 \$829.00 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Send Interrogatories to Janet Fyock via SignNow app. 0.10 \$829.00 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Janet Fyock's email requesting an extension of time to sign Interrogatories given 0.10 \$829.0	\$82.90 \$82.90 \$82.90 \$82.90 \$82.90 \$82.90 \$82.90
9/19/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner 9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner 9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner 9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner 9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Protection Legal, LLC Tiffany M. Yiatras 01	\$82.90 \$82.90 \$82.90 \$82.90 \$82.90
9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Forward finalized copies of Interrogatory Answers to Janet Fyock Fyock 0.10 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Send Interrogatories to Janet Fyock via SignNow app. 0.10 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Janet Fyock's email requesting an extension of time to sign Interrogatories given 0.10 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Jason Whittemore requesting an extension of time given 0.10 \$829.00 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Jason Whittemore requesting an extension of time given 0.10 \$829.00 \$8	\$82.90 \$82.90 \$82.90 \$82.90
9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Send Interrogatories to Janet Fyock via SignNow app. 0.10 \$829.00   9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Janet Fyock's email requesting an extension of time to sign Interrogatories given 0.10 \$829.00   9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Jason Whittemore requesting an extension of time given 0.10 \$829.00   9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Jason Whittemore requesting an extension of time given 0.10 \$829.00   9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Jason Whittemore requesting an extension of time given 0.10 \$829.00   9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Consumer Protection Legal, LLC Tiffa	\$82.90 \$82.90 \$82.90
9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Janet Fyock's email requesting an extension of time to sign Interrogatories given 0.10 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Email Jason Whittemore requesting an extension of time given 0.10 \$829.00	\$82.90 \$82.90
9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner 0.10 \$829.00 \$829.00 \$9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner 0.10 \$829.00 \$82	\$82.90
9/2///2019 Consumer Protection Legal, LLC Hiffany M. Yiatras 01. Partner 0.10 \$829.00	-
9/27/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Jason Whittemore's email regarding extension and advising he will email Stu 0.10 \$829.00	\$82.00
	\$82.90
10/1/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Janet Fyock's signed declaration and forward to Jason Whittemore. 0.10 \$829.00	\$82.90
10/31/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review email from Jason Whittemore attaching Janet Fyock's deposition notice and asking that we obtain dates of availability of Janet Fyock and respond thereto.	\$82.90
11/1/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review email from Jason Whittemore regarding logistics of scheduling deposition 0.10 \$829.00	\$82.90
11/5/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Send Jason Whittemore an email regarding scheduling Janet Fyock's deposition 0.10 \$829.00	\$82.90
11/5/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review and respond to Jason Whittemore's response regarding scheduling Janet Fyock's deposition 0.10 \$829.00	\$82.90
11/6/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Reach out to Janet Fyock via email regarding deposition dates and advise Janet Fyock that a 0.30 \$829.00	\$248.70
11/6/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review email from Janet Fyock regarding deposition dates of availability and question regarding location. 0.10 \$829.00	\$82.90
11/6/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Respond to email from Janet Fyock regarding deposition location and asking that she keep all dates of availability opening until further notice.	\$82.90
11/6/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Additional correspondence with Janet Fyock regarding deposition 0.10 \$829.00	\$82.90
11/6/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Notify Jason Whittemore regarding Janet Fyock's dates of availability for her deposition and provide information regarding the best location for her to have the deposition take place. \$829.00	\$82.90
11/7/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Review Jason Whittemore's email regarding pushing back discovery deadlines and depositions and notify Jason Whittemore that client's best day of availability in February 2020 will likely be on Wednesdays. 0.10 \$829.00	\$82.90
11/7/2019 Consumer Protection Legal, LLC Tiffany M. Yiatras 01. Partner Update client on Jason Whittemore's update regarding potentially pushing back depositions into February 0.10 \$829.00	\$82.90

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11/7/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review client's response regarding and forward to Jason Whittemore for his information.	0.10	\$829.00	\$82.90
11/13/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Jason Whittemore whether there is anything we can do to help team with	0.10	\$829.00	\$82.90
11/13/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore's response that everything is covered for reach out if that changes.	0.10	\$829.00	\$82.90
12/11/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Jason Whittemore's email regarding deposition dates for Janet Fyock and strategy related thereto	0.10	\$829.00	\$82.90
12/11/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore's response to my email that Janet Fyock prefers the deposition be taken on a Wednesday when she is off of work, namely that Jason Whittemore thinks the request can be accommodated and that he will seek for it to be on a Wednesday.	0.10	\$829.00	\$82.90
12/11/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore's email regarding Janet Fyock's preferred deposition location.	0.10	\$829.00	\$82.90
12/12/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Communicate with Janet Fyock regarding availability on January 22, 2020 for her deposition and inquiring her preferred deposition location and back up location.	0.30	\$829.00	\$248.70
12/12/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional communications with Janet Fyock regarding availability on January 22, 2020 for her deposition and inquiring her preferred deposition location and back up location.	0.10	\$829.00	\$82.90
12/12/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Outline Janet Fyock's position to Jason Whittemore regarding her availability for a deposition on 1/22/2020.	0.10	\$829.00	\$82.90
12/18/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock giving an update regarding details of the deposition not yet being confirmed and requesting her availability to meet in advance of deposition on January 21, 2020 to do depo prep.	0.20	\$829.00	\$165.80
12/18/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Janet Fyock's email providing her availability for meeting the evening before her deposition on January 21, 2020 after 5pm in West Chicago or Schaumburg and forward to Jason Whittemore for his review.	0.20	\$829.00	\$165.80
12/19/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review text from Jason Whittemore indicating and notifying me that we will want to	0.10	\$829.00	\$82.90
12/30/2019	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review text from Jason Whittemore regarding confirming Fyock Deposition details	0.10	\$829.00	\$82.90
1/2/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore requesting Janet Fyock's availability on January 15, 2020 for week before prep for deposition and asking if Geneva, IL will work to do so	0.10	\$829.00	\$82.90
1/2/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Reach out to Janet Fyock regarding deposition availability and location	0.40	\$829.00	\$331.60
1/2/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Send message to Jason Whittemore regarding deposition details -	0.10	\$829.00	\$82.90

1/2/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Coordinating deposition detail with Janet Fyock and attorneys	0.30	\$829.00	\$248.70
1/2/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Additional coordinating deposition details with client and attorneys	0.50	\$829.00	\$414.50
1/10/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Arelys McQuade attaching various documents for	0.10	\$829.00	\$82.90
1/10/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock	0.20	\$829.00	\$165.80
1/10/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Resend to Janet Fyock per her request	0.10	\$829.00	\$82.90
1/17/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review client	0.10	\$829.00	\$82.90
1/20/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Ask Lead Counsel about client's question regarding deposition prep.	0.10	\$829.00	\$82.90
1/20/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Deposition Prep	3.10	\$829.00	\$2,569.90
1/21/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Travel to Deposition	5.00	\$829.00	\$4,145.00
1/22/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Deposition Prep, Deposition, Travel Back home to Saint Louis from Chicago	11.00	\$829.00	\$9,119.00
2/19/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Check in with Jason Whittemore about status of 5/3 case and	0.10	\$829.00	\$82.90
2/24/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review ECF notice indicating that the Settlement Conference set for 3/24/20 is RESET to 4/6/2020 at 01:30 PM and remains set in Chambers	0.10	\$829.00	\$82.90
3/11/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Forwarding article to Jason Whittemore indicating that 5/3 has been caught opening fake accounts like Wells Fargo	0.10	\$829.00	\$82.90
3/23/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Check in with Jason Whittemore regarding whether was postponed or whether they are considering doing it remotely given several stay in place orders and isolating.	0.10	\$829.00	\$82.90
3/23/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore indicating nothing new to report regarding status of best it will be remote. If cancelled, we are going to ask Fifth Third to participate in one remotely with	0.10	\$829.00	\$82.90
4/6/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review ECF Notice indicating a new Conference set for 6/3/2020 at 01:00 PM	0.10	\$829.00	\$82.90
6/10/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	10:00 AM in Chambers before Judge Michael R. Barrett; as a reminder exparte settlement statements can be emailed to chambers at barrett_chambers@ohsd.uscourts.gov by 7/24/20. (ba)	0.10	\$829.00	\$82.90
8/3/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Reach out to Jason Whittemore regarding status of Fifth Third case	0.10	\$829.00	\$82.90
8/3/2020	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore Whitemore's response that is next week and	0.10	\$829.00	\$82.90

3/26/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Reach out to Jason Whittemore regarding Class Certification Order	0.10	\$829.00	\$82.90
3/20/2021	Consumer Frotection Legal, LLC	Tillally IVI. Tlauds	01. Faither		0.10	\$629.00	Φ0Δ.7U
5/4/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Check in with Jason Whittemore regarding 5/3 status and if there is anything we can do to help and review Jason Whittemore's response thereto regarding the same.	0.10	\$829.00	\$82.90
5/4/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore's update regarding Fifth Third case and letting us know if there is anything we can help with he will let us know.	0.10	\$829.00	\$82.90
6/11/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Arelys McQuade' email regarding draft letter to the named Class Representatives and asking for Janet Fyock's email address so it can be sent.	0.10	\$829.00	\$82.90
9/3/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Email from Jason Whittemore regarding	0.10	\$829.00	\$82.90
9/3/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Respond to Jason Whittemore regarding working with Janet Fyock to	0.10	\$829.00	\$82.90
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Draft email to Janet Fyock regarding update to Fifth Third Litigation and asking her to	0.30	\$829.00	\$248.70
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Janet Fyock's email regarding Fifth Third discovery responses.	0.30	\$829.00	\$248.70
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Janet Fyock's email regarding Fifth Third discovery responses.	0.10	\$829.00	\$82.90
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Work regarding Responding to Janet Fyock Supplemental Discovery Requests	0.30	\$829.00	\$248.70
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Work regarding Responding to Janet Fyock Supplemental Discovery Requests	0.30	\$829.00	\$248.70
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Work regarding Responding to Janet Fyock Supplemental Discovery Requests	0.20	\$829.00	\$165.80
9/7/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Work regarding Responding to Janet Fyock Supplemental Discovery Requests	0.10	\$829.00	\$82.90
9/8/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore's email about a call later in day regarding discovery	0.10	\$829.00	\$82.90
9/8/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Call with Jason Whittemore regarding strategy	0.20	\$829.00	\$165.80
9/14/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Arelys McQuade regarding responses to Second Set of Interrogatories to Janet Fyock	0.10	\$829.00	\$82.90
9/15/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Follow up with Janet Fyock regarding reviewing and filling out Verification form of Second Set of Interrogatories	0.20	\$829.00	\$165.80
9/15/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Update Arelys McQuade and Jason Whittemore regarding Janet Fyock's availability to review and sign Verification form	0.10	\$829.00	\$82.90
9/15/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Check in with Janet Fyock and update Arelys McQuade and Jason Whittemore regarding Janet Fyock's availability to review and sign Verification form	0.10	\$829.00	\$82.90

9/16/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Check in with Arelys McQuade and Jason Whittemore regarding whether Janet Fyock turned over her signed Verification form	0.10	\$829.00	\$82.90
9/16/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Arelys McQuade regarding fact Janet Fyock turned over her signed Verification form and respond thereto	0.10	\$829.00	\$82.90
11/1/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	E-mail Janet Fyock regarding	0.10	\$829.00	\$82.90
11/1/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Reach out to Janet Fyock regarding	0.20	\$829.00	\$165.80
11/1/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Jason Whittemore question regarding strategy	0.10	\$829.00	\$82.90
11/2/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Turn over documents produced by Janet Fyock to Jason Whittemore and Arelys McQuade	0.10	\$829.00	\$82.90
11/2/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review email from Jason Whittemore regarding need for	0.10	\$829.00	\$82.90
11/2/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review response from Jason Whittemore regarding strategy related to	0.10	\$829.00	\$82.90
11/2/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Follow up with Janet Fyock regarding need	0.10	\$829.00	\$82.90
12/1/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Follow up with Janet Fyock regarding doing a reasonable and diligent search for correspondence with Fifth Third	0.10	\$829.00	\$82.90
12/1/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to Janet Fyock's e-mail regarding status of search	0.10	\$829.00	\$82.90
12/2/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Forward Fifth Third emails from Janet Fyock to Jason Whittemore after Janet Fyock did a reasonable and diligent search for the same	0.10	\$829.00	\$82.90
12/13/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Working with Janet Fyock to ensure	0.50	\$829.00	\$414.50
12/14/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Forward e-mail from Janet Fyock	0.10	\$829.00	\$82.90
12/14/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	E-mail Janet Fyock for copy of credit card agreement	0.10	\$829.00	\$82.90
12/14/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review and respond to e-mail from Janet Fyock indicating that she does not have that agreement and forwarding her response to Jason Whittemore whitmore	0.10	\$829.00	\$82.90
12/15/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review Jason Whittemore's response to my e-mail that Janet Fyock does not have the Fifth Third credit card agreement in her possession and that she does not really have a credit card, but instead a debit card linked to her account	0.10	\$829.00	\$82.90
12/15/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review e-mail from Aurelius McQuade regarding	0.10	\$829.00	\$82.90

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12/16/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Confirm with Arelys McQuade that they received sign interrogatory responses from Janet Fyock	0.10	\$829.00	\$82.90
12/20/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review e-mail from a Arelys McQuade containing	0.10	\$829.00	\$82.90
12/20/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Review changes to	0.10	\$829.00	\$82.90
12/22/2021	Consumer Protection Legal, LLC	Tiffany M. Yiatras	01. Partner	Email Janet Fyock regarding	0.10	\$829.00	\$82.90
3/3/2023	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Email Jason Whittemore regarding status of upcoming trial.	0.10	\$997.00	\$99.70
3/28/2023	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Call and text Janet Fyock regarding upcoming trial availability	0.10	\$997.00	\$99.70
3/29/2023	Consumer Protection Legal, LLC	Francis J. "Casey" Flynn, Jr.	01. Partner	Call with Janet Fyock regarding upcoming trial and availability	0.60	\$997.00	\$598.20
				TOTALS:	263.60		\$239,154.80

# EXHIBIT 13

#### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

	) CASE NO. 1:12-CV-00851
In re: Fifth Third Early Access Cash	)
Advance Litigation	) HON. MICHAEL R. BARRETT
	)

#### **DECLARATION OF JASPER D. WARD IV**

- I, Jasper D. Ward IV, hereby declare as follows:
- 1. I am over the age of eighteen years and not a party to the action herein. I make this Declaration of my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
  - 2. I am admitted and licensed to practice law in the Commonwealth of Kentucky.
- 3. I am an attorney with the law firm of Jones Ward PLC. I submit this declaration in support of my firm's motion for an award of attorneys' fees and in connection with services rendered in this case.
- 4. From the moment we became involved in this case, we undertook considerable risk that despite our significant investment of time and effort we would never receive any payment from our prosecution of this action as we were retained on a contingency fee basis and we knew that Fifth Third would devote significant resources to this litigation, which included hiring aggressive and skilled attorneys who were providing a tenacious defense to this case. We also knew that prevailing and ultimately collecting any recovery from Fifth Third was never anywhere near certain, especially in light of the significant issues regarding the legal viability of plaintiffs' claims, whether plaintiffs would be able to obtain the necessary discovery and evidence to support those claims, whether the case would be certified, and whether we would prevail on summary judgment and/or at trial. We accepted and proceeded with this litigation in the face of this uncertainty, agreeing to undertake this litigation on a wholly contingent basis and thereby initiating

complex, lengthy litigation, with no guarantee of compensation for the significant amount of time and effort that we were prepared to and did invest to prosecute this case.

5. By pursuing this litigation and devoting the significant resources that this litigation required, we necessarily had to forego developing and working on as many other cases available to us as we otherwise could have.

#### I. WORK UNDERTAKEN

- 6. Before initiating any action, Class Counsel conducted a thorough investigation of the claims, both legal and factual. Specifically, we thoroughly investigated and researched the claims, which allowed Class Counsel to better evaluate the factual claims regarding the allegations against Defendant. In summary, we undertook the following assignments: client retention work; investigation of claims; interviewing potential class representatives; drafting complaints; effecting service; meetings and strategizing regarding organizational structure; research and writing assignments and analyzing statutory and common law; analyze Plaintiff's bank statements; research and writing related to TILA violations; work related to responding to written discovery requests; work with clients re: gathering documents; client deposition preparation and client deposition; work regarding damage analysis; analysis of strength of class representatives claims and strength of defendant's defenses; client communications and updates.
- 7. This work was done either (a) prior to the appointment of Jason Whittemore as Interim Co-Lead Counsel or (b) after Jason Whittemore was appointed Interim Co-Lead Counsel and later Co-Lead Counsel in consultation with him or done at his request after his respective appointments.
- 8. Furthermore, at the direction of Lead Counsel, we removed any time that was clearly not TILA related. For example, Plaintiff's fee application does not include any hours expended after the Court issued its Order on Summary Judgment on TILA. Plaintiffs

fee application does not include any hours solely attributable to researching issues related to usury, DIDA, home state v. host state research, and the like.

#### II. TIMEKEEPING AND CALCULATION OF LODESTAR

9. As of March 29, 2023, the below timekeepers collectively devoted 150.4 hours of professional time to the prosecution of this action. At their then current reasonable and regular hourly billing rates, this equates to a lodestar of \$132,051.20.

Name	Years of Practice	Time Spent	Current Rate	Lodestar
Jasper D. Ward IV	16	84.7	\$878.00	\$74,366.60
Alex C. Davis	11	65.7	\$878.00	\$57,684.60
TOTAL:		150.4		\$132,051.20

- 10. The above tables were prepared from contemporaneous time records that are regularly prepared and maintained by my firm and are maintained electronically. I have reviewed these time records in order to confirm their accuracy.
- 11. Attached hereto as **Exhibit A** is a true and accurate copy of the detailed time records indicating the time spent by Jasper Ward and Alex Davis. who have been involved in this litigation from case inception through December 20, 2023 as set forth in the detailed time records. The lodestar calculation is based on the attorney's current billing rates.
- 12. The practice of both myself and the attorneys with Jones Ward PLC is to record time in tenth of an hour increments, and to do so contemporaneously. This method of recording time is more accurate than recording time by quarter hour increments, which tends to inflate the amount of time billed for short telephone conferences and other short tasks.
- 13. The hourly rates identified above are the same as the regular current rates charged for non-contingent matter and/or which have been accepted in other litigation, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

14. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

15. I am the attorney who oversaw the work performed by Alex Davis. In my experience, the number of hours devoted to the assignments in this case are well within the range of hours that reasonably would be expected under the circumstances based on the amount of investigation required relative to the issues presented in this action.

16. The rates above are reasonable and within the standards of the practice area in which we practice.

I declare under penalty of perjury that the foregoing declaration is true and correct to the best of my knowledge.

Executed this 20th day of December, 2023 in Louisville, Kentucky.

/s/ Jasper D. Ward IV JASPER D. WARD IV

DATE	TIME	ATTORNEY	TASK
5/7/2013	1	7 Jasper Ward	Review Fifth Third Early Access program and fees, disclosures; review Illinois Complaint for analysis of claims; discussion with potential KY class rep; research Kentucky law on usury and banking regulations on interest; draft Complaint; calculate APR on client's early access loar
5/8/2013	ļ.	2.1 Jasper Ward	Edit and finalize Complaint and paperwork to file with Complaint; emails with Illinois (St. Louis) counsel regarding same
5/9/2013	}	4.5 Jasper Ward	Edit and finalize Complaint and paperwork to file with Complaint; emails with Illinois (St. Louis) counsel regarding same; prepare Tennessee complaint and review client informatior
5/10/2013	ļ.	7.5 Jasper Ward	Travel to Nashville to file Complaint; emails with co-counsel regarding TN complaint
5/13/2013	;	1.1 Jasper Ward	Teleconference with co-counsel to discuss responding to Ohio Plaintiff's counsel's motion for appointment as interim class counsel; emails with co-counsel regarding new Complaint:
5/14/2013	}	1.6 Jasper Ward	transfer to SD, local counsel, emails
5/15/2013		3.1 Jasper Ward	Local counsel, conf. call, MDL, coordination, review white paper from Jason Whittemore
5/17/2013			Morgan, transfer, email to co-counsel, MDL
5/20/2013			Emails, transfer, MDL discussion
5/30/2013			Call and emails, reading about proposed stucture letter from Steve
6/10/2013			Transfer proposal emails and review
6/11/2013			Transfer proposal emails and review
6/12/2013			Transfer proposal emails and review; call to prepare for status call
6/13/2013			Status call with court, prepare, post-call conf. call, review proposal to transfer
6/14/2013			Transfer proposal emails and review
6/17/2013			Transfer proposal emails and review
6/18/2013			Transfer proposal emails and review
6/20/2013			Transfer proposal emails and review
6/21/2013			Finalize transfer to SD OH; review ECF
6/26/2013			Conf. call to discuss strategy for status call w/Judge
6/27/2013			emails, status conf., post-call to discuss
6/28/2013			emais, satus turi, post-cai contene tan o uscuss letter to Judge w/proposal, omail response
7/8/2013			letter to Judge wyproposal, ernan response
7/10/2013			letter to Judge Wyproposal, email response
7/10/2013			ietter to Judge Wyproposal, eman response Travel to and attend lunch with Judge, meeting with co-counsel
			Proposed order for class counsel
7/15/2013 7/16/2013			Proposed order for class counsel Proposed order for class counsel
7/18/2013			Proposed billing and costs protocol
7/26/2013			Intake and contract with potential KY class rep
8/1/2013		0.5 Jasper Ward	
8/7/2013			emails with former employee asking about claims
8/12/2013			emails with lead counsel about assessment, employee, potential new class rep; pro hac
8/13/2013			emails with lead counsel about employee, potential new class rep; pro hac
8/20/2013			Review email from lead counsel regarding research projects and review plaintiff's information sheet
9/6/2013			Finalize memo and client information sheets; edit and finalize A. Davis sections for memo to PSC; email to co-counsel
9/11/2013			Emails with lead counsel about scheduling conference and memo, consolidated complaint
9/26/2013			Conference call to discsuss amended complaint and additional research; review memo and emails from co-counsel regarding 1831
10/1/2013			Review amended fact sections and make edits
10/2/2013			emails with lead counsel about amended fact section for JW clients; amended complaint
10/3/2013			emails with lead counsel about amended fact section for JW clients
12/19/2013			emails with lead counsel about MTD response and conf. call
12/20/2013			conf. call about MTD response, review MTD and sections assigned
12/27/2013			emails with lead counsel about assignment, review memo on research needed and response section
12/30/2013			emails withlead counsel
1/15/2014			Review section, additional research and edits
1/17/2014			Review lead counsel email about changes and additional research needed on response to MTD brief; emails with Jason, Alex, re: other banks, research and draft changes to section
8/13/2014			Review Supplemental authority and response by lead counsel
4/29/2015			Review update from lead counsel on TILA and settlement
4/30/2015			Review update from lead counsel on TILA and settlement and status conference
8/15/2015			Review update from lead counsel regarding settlement
10/8/2015			Review update from lead counsel regarding settlement
1/6/2016			Review update from lead counsel regarding settlement
7/26/2016		0.2 Jasper Ward	Review update from lead counsel regarding settlement
9/15/2016	i	1.5 Jasper Ward	Review, respond and analyze correspondence regarding settlement, communications with clients, Term Sheet
5/7/2013	į.	2.3 Alex Davis	Review Fifth Third Early Access program and fees, disclosures; meet with potential KY class rep; research Kentucky law on usury and banking regulations on interest; draft Complaint; calculate APR on client's early access loar
5/8/2013	;	3.1 Alex Davis	Draft initial Complaint and paperwork to file with Complaint; send to Jasper for edits
5/9/2013	}	3.4 Alex Davis	Draft initial Tennessee complaint and discuss same with client
5/10/2013	1	1.4 Alex Davis	Research local rules in TN for filing complaint; arrange logistics for filing with co counsel
5/13/2013	ļ.	1.1 Alex Davis	Teleconference with co-counsel to discuss responding to Ohio Plaintiff's counsel's motion for appointment as interim class counsel; emails with co-counsel regarding new Complaint:
5/14/2013	}	1.6 Alex Davis	transfer to SD, local counsel, emails
5/15/2013		1.8 Alex Davis	Local counsel, conf. call, MDL, coordination, review white paper from Jason Whittemore
5/17/2013	;	0.8 Alex Davis	Morgan, transfer, email to co-counsel, MDL
5/20/2013	;	1.5 Alex Davis	Emails, transfer, MDL discussion
5/30/2013	;	1.6 Alex Davis	Calls with clients in TN and KY to update status of litigation
6/10/2013	;	0.7 Alex Davis	Transfer proposal emails and review
6/11/2013			Transfer proposal emails and review
6/12/2013		1.6 Alex Davis	Transfer proposal emails and review; call to prepare for status call
6/13/2013		1.4 Alex Davis	Status call with court, prepare, post-call conf. call, review proposal to transfer
6/14/2013			Transfer proposal emails and review

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6/17/2013	0.5 Alex Davis	Transfer proposal emails and review
6/18/2013	1.5 Alex Davis	Transfer proposal emails and review
6/20/2013	0.5 Alex Davis	Transfer proposal emails and review
6/21/2013	0.8 Alex Davis	Finalize transfer to SD OH; review ECF
6/26/2013	1.5 Alex Davis	Conf. call to discuss strategy for status call w/Judge
6/27/2013	2.5 Alex Davis	emails, status conf, post-call conference call to discuss
6/28/2013	0.4 Alex Davis	letter to Judge w/proposal, email response
7/8/2013	1.5 Alex Davis	letter to Judge w/proposal, email response
7/10/2013	0.5 Alex Davis	letter to Judge w/proposal, email response
7/15/2013	0.5 Alex Davis	Proposed order for class counsel
7/16/2013	0.5 Alex Davis	Proposed order for class counsel
7/18/2013	0.5 Alex Davis	Proposed billing and costs protocol
7/26/2013	2.4 Alex Davis	Intake and contract with additional potential KY class rep
8/7/2013	0.5 Alex Davis	review emails with former employee asking about claims
8/12/2013	0.6 Alex Davis	emails with lead counsel about assessment, employee, potential new class rep; pro hac
8/13/2013	0.5 Alex Davis	emails with lead counsel about employee, potential new class rep; pro hac
8/20/2013	1 Alex Davis	Review email from lead counsel regarding research projects and review plaintiff's information sheet
8/26/2013	1.3 Alex Davis	Intake and emails with additional potential class reps in KY and TN and other states; research on loan history and interest payments
9/4/2013	2.7 Alex Davis	Additional edits to memo w J Ward; additional research on claims and applicable state law
9/5/2013	1.2 Alex Davis	Final edits to memo w J Ward
9/11/2013	0.5 Alex Davis	Emails with lead counsel about scheduling conference and memo, consolidated complaint
9/26/2013	2.5 Alex Davis	Conference call to discsuss amended complaint and additional research; review memo and emails from co-counsel regarding 1831
10/1/2013	1.3 Alex Davis	Review amended fact sections and make edits
10/2/2013	1.4 Alex Davis	emails with lead counsel about amended fact section for JW clients; amended complaint
10/3/2013	0.5 Alex Davis	emails with lead counsel about amended fact section for JW clients
12/19/2013	0.5 Alex Davis	emails with lead counsel about MTD response and conf. call
12/20/2013	1 Alex Davis	conf. call about MTD response, review MTD and sections assigned
12/27/2013	0.8 Alex Davis	emails with lead counsel about assignment, review memo on research needed and response section
12/30/2013	0.1 Alex Davis	emails withlead counsel
1/15/2014	2.4 Alex Davis	Talk with KY and TN clients about interest payments, Ioan details to confirm facts for pleadings
1/17/2014	3.3 Alex Davis	Review lead counsel email about changes and additional research needed on response to MTD brief; emails with Jason, Jasper re: other banks, research and draft changes to section
8/13/2014	1 Alex Davis	Review Supplemental authority and response by lead counsel
4/29/2015	0.2 Alex Davis	Review update from lead counsel on TILA and settlement
4/30/2015	0.2 Alex Davis	Review update from lead counsel on TILA and settlement and status conference
8/15/2015	0.3 Alex Davis	Review update from lead counsel regarding settlement
10/8/2015	0.5 Alex Davis	Review update from lead counsel regarding settlement
1/6/2016	0.3 Alex Davis	Review update from lead counsel regarding settlement
7/26/2016	0.2 Alex Davis	Review update from lead counsel regarding settlement
9/15/2016	1.7 Alex Davis	Review, respond and analyze correspondence regarding settlement, communications with clients, Term Sheet
9/26/2016	2.3 Alex Davis	Discuss settlement term sheet with JW clients in KY and TN; answer questions regarding same

# EXHIBIT 14

Case: 1:12-cv-00851-MRB Doc #: 303-16 Filed: 12/26/23 Page: 2 of 11 PAGEID #: 10806

EFiled: Jul 24 2023 04:33PM EDT Transaction ID 70469560 Case No. Multi-Case

# EXHIBIT B

#### IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

In re: TRANSPERFECT GLOBAL, INC.	C.A. No. 9700-CM
ELIZABETH ELTING,	
Petitioner,	
v,	
PHILIP R. SHAWE and SHIRLEY SHAWE, Objectors,	C.A. No. 10449-CM
and	
TRANSPERFECT GLOBAL, INC.,	
Nominal Party.	

#### AFFIDAVIT OF CHARLES DAVANT

- 1. I am a partner in the law firm Williams & Connolly LLP ("W&C"), which represents Robert Pincus, who served as Custodian for the Court of Chancery of the State of Delaware. This declaration is based on my personal knowledge and the billing records of W&C, which are kept in the ordinary course of business.
- 2. The hours worked and billed, hourly rates, timekeepers' positions, tasks performed, and total fees and out-of-pocket expenses for W&C for Mr. Pincus for the months of April, May, and June 2023 are set forth in the invoices attached as Exhibits 1-3, which I have reviewed. These amounts were actually incurred and, in my judgment, were reasonable for the tasks that were performed.
- 3. The hourly rates charged by W&C in the attached invoices are consistent with the hourly rates charged by W&C to clients other than Mr. Pincus.

Charles Davant IV

Washington, D.C.:

Signed and sworn to before me on Thursday, June 29, 2023, by Charles Davant IV, who is known

to me.

Notary Public

专(-79.2023

SHARON L. BROWN NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires August 31, 2024 Case: 1:12-cv-00851-MRB Doc #: 303-16 Filed: 12/26/23 Page: 4 of 11\_PAGEID #: 10808

LAW OFFICES

#### WILLIAMS & CONNOLLY LLP\*

680 MAINE AVENUE SW WASHINGTON, DC 20024 (202) 434-5000 WWW.WC.COM

May 9, 2023

#### PRIVILEGED AND CONFIDENTIAL

Invoice Number: 551911

Robert B. Pincus Court-Appointed Custodian PO Box 4570 Wilmington, DE 19807

Matter Description: TransPerfect v Pincus Case 1:22-cv-01477

BILLING STATEMENT	
Professional Services Rendered thru April 30, 2023	\$5,001.50
TOTAL PROFESSIONAL FEES	\$5,001.50
TOTAL EXPENSES	\$2,603.68
CURRENT FEES AND EXPENSES DUE	\$7,605.18
Balance Due From Previous Statement	\$382,014.57
PRIOR BALANCE DUE	\$382,014.57
TOTAL BALANCE DUE AS OF THIS DATE	\$389,619.75

CLIENT NO. 47094 INVOICE NO. 551911 May 9, 2023

Matter No. 47094.0004 – TransPerfect v Pincus Case 1:22-cv-01477

TIMEKEEPER SUMMARY						
TITLE	HOURS	RATE	<b>AMOUNT</b>			
Partner	2.10	1,275.00	2,677.50			
Associate	2.80	830.00	2,324.00			
	4.90		\$5,001.50			

Date	Timekeeper	Narrative	Hours	Amount
04/10/23	Associate	Read Troutman first draft response to objections to Mr. Pincus's fee petition.	0.40	332.00
04/11/23	Associate	Provided edits and comments to fee petition obections draft response brief.	1.50	1,245.00
04/12/23	Associate	Call with co counsel re fee petition briefing.	0.20	166.00
04/12/23	Partner	Read proposed revisions to draft fee petition objections response brief and considered additional legal authorities.	0.40	510.00
04/13/23	Associate	Reviewed new version of draft response to fee petition objections.	0.70	581.00
04/14/23	Partner	Work on Fee Petition Objections response.	1.00	1,275.00
04/14/23	Partner	Meet-and-confer regarding payment of invoices by TPC.	0.40	510.00
04/14/23	Partner	Follow-up communications with co-counsel.	0.30	382.50
		TOTAL PROFESSIONAL SERVICES:		\$5,001.50

CLIENT NO. 47094 INVOICE NO. 551911 May 9, 2023

Matter No. 47094.0004 – TransPerfect v Pincus Case 1:22-cv-01477

**EXPENSE SUMMARY** 

EXPENSE DESCRIPTION
Westlaw 2,603.68

Total Expenses Due: \$2,603.68

**DESCRIPTION** 

04/01/2023 W & C, WILLIAMS Westlaw 2,603.68

Total Expenses: \$2,603.68

Case: 1:12-cv-00851-MRB Doc #: 303-16 Filed: 12/26/23 Page: 7 of 11 PAGEID #: 10811

LAW OFFICES

## EXHIBIT 2

# WILLIAMS & CONNOLLY LLP 680 MAINE AVENUE SW

(202) 434-5000 WWW.WC.COM

WASHINGTON, DC 20024

June 14, 2023

#### PRIVILEGED AND CONFIDENTIAL

Invoice Number: 553263

Robert B. Pincus Court-Appointed Custodian PO Box 4570 Wilmington, DE 19807

Matter Description: TransPerfect v Pincus Case 1:22-cv-01477

BILLING STATEMENT	
Professional Services Rendered thru May 31, 2023	\$747.00
TOTAL PROFESSIONAL FEES	\$747.00
CURRENT FEES AND EXPENSES DUE	\$747.00
Balance Due From Previous Statement	\$389,619.75
PRIOR BALANCE DUE	\$389,619.75
TOTAL BALANCE DUE AS OF THIS DATE	\$390,366.75

CLIENT NO. 47094 INVOICE NO. 553263 June 14, 2023

Matter No. 47094.0004 – TransPerfect v Pincus Case 1:22-cv-01477

#### TIMEKEEPER SUMMARY

TITLE	HOURS	RATE	<b>AMOUNT</b>
Associate	0.90	830.00	747.00
	0.90	_	\$747.00

Date	Timekeeper	Narrative	Hours	Amount
05/06/23	Associate	Reviewed TPG's objections to fee petitions.	0.40	332.00
05/18/23	Associate	Reviewed draft fee petition response to objections.	0.30	249.00
05/29/23	Associate	Reviewed fee petition objection reply.	0.20	166.00
		TOTAL PROFESSIONAL SERVICES:		\$747.00

LAW OFFICES

#### WILLIAMS & CONNOLLY LLP\*

680 MAINE AVENUE SW WASHINGTON, DC 20024 (202) 434-5000 WWW.WC.COM

June 29, 2023

#### PRIVILEGED AND CONFIDENTIAL

Invoice Number: 553771

Robert B. Pincus Court-Appointed Custodian PO Box 4570 Wilmington, DE 19807

Matter Description: TransPerfect v Pincus Case 1:22-cv-01477

BILLING STATEMENT	
Professional Services Rendered thru June 29, 2023	\$31,278.50
TOTAL PROFESSIONAL FEES	\$31,278.50
CURRENT FEES AND EXPENSES DUE	\$31,278.50
Balance Due From Previous Statement	\$390,366.75
PRIOR BALANCE DUE	\$390,366.75
TOTAL BALANCE DUE AS OF THIS DATE	\$421,645.25

\$31,278.50

CLIENT NO. 47094 INVOICE NO. 553771 June 29, 2023

Matter No. 47094.0004 – TransPerfect v Pincus Case 1:22-cv-01477

#### TIMEKEEPER SUMMARY

TITLE	HOURS	RATE	<b>AMOUNT</b>
Partner	23.10	1,275.00	29,452.50
Associate	2.20	830.00	1,826.00
	25.30		\$31,278.50

Date	Timekeeper	Narrative	Hours	Amount
06/06/23	Partner	Communications with colleagues re court hearing on MTD.	0.30	382.50
06/11/23	Partner	Attention to MTD hearing prep.	0.30	382.50
06/12/23	Partner	Preparing for hearing on motion to dismiss.	5.20	6,630.00
06/12/23	Associate	Checked cases cited in briefs for any relevant subsequent decisions ahead of oral argument.	2.20	1,826.00
06/13/23	Partner	Call with Credit Suisse's counsel re hearing.	0.20	255.00
06/13/23	Partner	Continued preparing for hearing on MTD, including reading or rereading legal authorities cited in briefs.	5.00	6,375.00
06/13/23	Partner	Attention to Delaware hearing logistics.	0.30	382.50
06/14/23	Partner	Preparing for MTD hearing.	2.70	3,442.50
06/15/23	Partner	Preparing for hearing on motion to dismiss.	1.40	1,785.00
06/16/23	Partner	Travel to and from MTD hearing, including waiting for delayed Amtrak.	4.20	5,355.00
06/16/23	Partner	Final preparation for MTD hearing.	2.10	2,677.50
06/16/23	Partner	MTD hearing.	0.60	765.00
06/28/23	Partner	Attention to requirements for fee petition (invoices, affidavit, etc.).	0.80	1,020.00

TOTAL PROFESSIONAL SERVICES:

**Multi-Case Filing Detail:** The document above has been filed and/or served into multiple cases, see the details below including the case number and name.

#### **Transaction Details**

Court: DE Court of Chancery Civil Action Document Type: Exhibits

**Document Title:** Exhibit B - Invoices of Williams & Connolly for the Period of April

- June 2023

Submitted Date & Time: Jul 24 2023 4:33PM

#### **Case Details**

Case NumberCase Name9700-CMCONF ORD ON DISC In re TransPerfect Global Inc10449-CMCONF ORD Elting, Elizabeth vs Philip R Shawe et al