

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Jason Lee Hinkel, Sr. and Narily Noon,
individually and as representatives of the
Class,

Case No. 2:22-cv-01902-KBH

Plaintiffs,

**MOTION FOR ATTORNEYS' FEES AND
NAMED PLAINTIFF SERVICE AWARDS**

v.

Universal Credit Services, LLC,

Defendant.

Plaintiffs Jason Lee Hinkel, Sr. and Narily Noon (“Plaintiffs”) and Class Counsel respectfully move the Court to approve (1) the requested attorneys’ fees amount of \$225,000 to be paid to Class Counsel separate from the Settlement Fund, and (2) the requested Named Plaintiff Service Awards of \$7,500 for each Plaintiff to be paid from the Settlement Fund.

Defendant Universal Credit Services, LLC¹ (“Defendant”) does not oppose the relief sought in this Motion.

Dated: March 21, 2024

Respectfully submitted,

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¹ Xactus, LLC is the successor in interest to certain assets of Universal Credit Services, LLC. Xactus, LLC, in its capacity as successor in interest to certain assets of Universal Credit Services, LLC and Universal Credit Services, LLC are collectively referred to as “Defendant.”

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MEMORANDUM IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES & SERVICE AWARD

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Plaintiffs Jason Lee Hinkel, Sr. and Narily Noon (“Plaintiffs” or “Class Representatives”) and Class Counsel have zealously litigated this Fair Credit Reporting Act (“FCRA”) action for two years, entirely on a contingent fee basis, with their efforts resulting in a settlement that establishes a common fund of \$225,000 from which Settlement Class Members will be eligible to receive a payment that represents a significant portion of the maximum statutory damages available for the claims presented here. The result achieved and the benefits to the Settlement Class could not have been attained absent Class Counsel’s time, effort, and skill, as well as Plaintiffs’ active participation in the case.

The requested attorneys’ fee of \$225,000 is less than Class Counsel’s lodestar, will not reduce the common fund for the Class because it will be paid separately by Defendant, and is reasonable in light of the recovery obtained and the time put into the case. Attorneys’ fees were negotiated only after relief for the Class was agreed upon. Class Counsel have received no payment or reimbursement to date for their work. Further, the requested service awards of \$7,500 for each Named Plaintiff, which will be requested to be paid from the common fund, are appropriate in light of the Class Representatives’ investment of time and energy in the litigation, and the benefit their work created for Class Members.

The amount of fees and service awards that Plaintiffs and Class Counsel intended to seek were included in the Notice to the Settlement Class. While the objections deadline has not yet passed, as of the date of this filing, no Settlement Class Member has objected to the requested attorneys’ fees or service awards – or to the settlement itself.

I. BACKGROUND

The litigation history, history of settlement negotiations, and terms of the settlement are set forth in detail in the Memorandum in Support of Plaintiffs’ Motion for Preliminary Settlement

Approval (ECF No. 41) and are incorporated by reference here. This Memorandum will focus on the efforts of Class Counsel and Plaintiffs to achieve the excellent result in this case.

A. Class Counsel’s Work to Secure Benefits for the Class.

Class Counsel are highly experienced FCRA practitioners who have years of experience in litigating complex FCRA class actions such as this case. (*See, e.g.*, ECF Nos. 41-2, 41-4.), *see also McKey v. TenantReports.com, LLC*, No. 22-cv-1908-GJP, ECF No. 42 at 5 n.2 (E.D. Pa. Feb. 27, 2024) (approving requested fee and noting that the undersigned “have extensive experience litigating FCRA class actions [and] represented the class zealously and professionally through complex litigation with very real litigation risks.”) (Pappert, J.). As a result of their expertise in this area, Class Counsel were able to efficiently and effectively litigate this action and had the credibility necessary to negotiate an excellent settlement on behalf of the Settlement Class. As noted above, Class Counsel have worked without compensation or reimbursement for their time and out-of-pocket expenses incurred in furtherance of this litigation and settlement. (Declaration of Joseph C. Hashmall (“Hashmall Decl.”) ¶ 3.) Before taking the case, Class Counsel negotiated a customary contingency fee agreement with the Plaintiffs, with the understanding that the amount would be an appropriate incentive for Class Counsel to take on the financial risks involved in the representation. (*Id.*) Class Counsel also agreed to advance all costs. (*Id.*) In the event that Class Counsel did not successfully resolve this matter, they would have been paid nothing.

Although the parties settled this case pre-trial, Class Counsel have invested a substantial amount of resources in investigation, discovery, litigation, and settlement of the matter. Many of the tasks performed by Class Counsel are not evident based solely on a review of the docket, as much of the litigation took place outside of the courtroom.

Prior to reaching the settlement in this matter, Class Counsel had undertaken, among other things, (1) investigating the claims, drafting and filing the complaint, (2) propounding and responding to written discovery requests, (3) taking the deposition of Defendant's 30(b)(6) representative, (4) reviewing and analyzing document and data productions from Defendant, including retaining an expert to assist and ultimately prepare a report, (5) pursuing third party discovery with Defendant's data vendor, (6) preparing for and defending Plaintiffs' and their spouses' depositions, (7) conducting arms-length negotiations, working to finalize the Terms Sheet, and reviewing the draft Settlement Agreement, (8) drafting the motion for preliminary settlement approval. (Hashmall Decl. ¶ 4.) Class Counsel will continue efforts in responding to settlement-related inquiries and monitoring the settlement administration process, and draft and prepare to argue the motion for final approval of the settlement. (*Id.* ¶ 5.)

Class Counsel's lodestar reflects the dedication of resources to this matter. To date, Counsel have devoted over 365 hours to this matter, resulting in \$274,000 in lodestar calculated at Class Counsel's normal hourly rates. (*Id.* ¶ 6.) Class Counsel have also incurred costs of \$23,533. (*Id.* ¶ 7.) The requested fee thus constitutes only 75% of Class Counsel's total lodestar and costs in this matter.¹ This negative multiplier also does not account for the time that will be spent on the continuing efforts referenced above in continuing to oversee settlement administration, preparing for final approval, and responding to inquiries from class members.

Notice was distributed to the Settlement Class on February 13, 2024, and the objections deadline is April 13, 2024. As of today, zero objections have been received. (*Id.* ¶ 8.)

¹ That is, the amount requested, \$225,000, represents only 75% of Class Counsel's total lodestar and costs (\$297,533).

B. The Class Representatives' Participation

Plaintiffs have played a valuable role in bringing this action to a successful resolution. Among other things, the Class Representatives (1) provided information for the complaint and reviewed the same prior to filing, (2) responded to extensive written discovery requests and located and provided fulsome sets of documents for production, (3) prepared and sat for full-day depositions, as did their spouses, (4) consulted with Counsel during settlement negotiations, and (5) reviewed and approved the Settlement Agreement. (*Id.* ¶ 9.)

In sum, Plaintiffs played an active role in litigation, discovery, and settlement and have regularly communicated with Class Counsel to stay abreast of developments in the case. The settlement's allowance of a service award of \$7,500 for each of them reflects their initiative in pursuing this action and their time invested in the litigation.

II. LEGAL STANDARD

Fed. R. Civ. P. 23(h) provides that in a class action settlement, "the court may award reasonable attorney's fees and nontaxable costs that are authorized by law or by the parties' agreement."

Awards of attorneys' fees are calculated using one of two methods, the percentage-of-the-fund method, or the lodestar method. *Sullivan v. DB Investments, Inc.*, 667 F.3d 273, 330 (3d Cir. 2011). The percentage-of-the-fund method applies a "certain percentage to the settlement fund, while [the lodestar method] multiplies the number of hours class counsel worked on a case by a reasonable hourly billing rate for such services." *Id.* (quoting *In re Diet Drugs Prod. Liab. Litig.*, 582 F.3d 524, 540 (3d Cir. 2009)) (internal citations and quotations omitted). In this Circuit, courts have the discretion to award fees in common fund cases based on either method. *In re Diet Drugs*, 582 F.3d at 540; *In re AT&T Corp. Secs. Litig.*, 455 F.3d 160, 164 (3d Cir. 2006).

In reviewing attorneys' fees that are to be paid separately from the common fund, such as is the case here, the courts generally apply the lodestar method to assess the reasonableness of the fee. *In re Gen. Motors Corp. Pick-Up Truck Fuel Prod. Liab. Litig.*, 55 F.3d 768, 821 (3d Cir. 1995) ("Because the lodestar award is de-coupled from the class recovery, the lodestar assures counsel undertaking socially beneficial litigation . . . an adequate fee"). This method is appropriate here in light of both the fact that fees were negotiated separate and apart from the fund that will be used to pay class members, and in light of the fact that the FCRA is a fee-shifting statute. *See* 15 U.S.C. § 1681n(a)(3); *Gen. Motors Corp.*, 55 F.3d at 821 (defining "socially beneficial litigation" as "legislatively identified by the statutory fee shifting provision"); *see also Lake v. First Nationwide Bank*, 900 F. Supp. 726, 734 (E.D. Pa. 1995) ("In statutory fee-shifting cases, the usual basis for awarding fees is the lodestar method."). This means that the statutory scheme contemplates that, at a minimum, attorneys who succeed in litigation should receive reasonable payment for the work performed. "Where a plaintiff has obtained excellent results, his attorney should recover a fully compensatory fee." *Hensley v. Eckerhart*, 461 U.S. 424, 435 (1983).

III. ARGUMENT

A. The Lodestar Method Confirms the Amount Requested is Reasonable

Under the lodestar method, the court "determines the lodestar by multiplying the number of hours counsel reasonably worked on a client's case by a reasonable hourly billing rate for such services in a given geographical area," the nature of the services provided, and the experience of the lawyers. *Gunter v. Ridgewood Energy Corp.* 223 F.3d 190, 199 (3d Cir. 2000). The lodestar figure is "presumptively reasonable" where it arises from a reasonable hourly rate and a reasonable number of hours. *Planned Parenthood of Cent. New Jersey v. Attorney General of the State of N.J.*, 297 F.3d 253, 265 n.5 (3d Cir. 2002). "Time expended is considered reasonable if the work

performed was useful and of a type ordinarily necessary to secure the final result obtained from the litigation.” *In re Schering-Plough/Merck Merger Litig.*, No. 09-1099, 2010 WL 1257722, *17 (D.N.J. March 26, 2010) (internal quotations omitted).

While courts applying the lodestar method generally also evaluate the percentage of the fund as a ‘cross-check,’ in cases brought under fee-shifting statutes, fee requests under the lodestar method are approved even when the requested fee exceeds the amount approved for the Class. *See Reibstein v. Rite Aid Corp.*, 761 F. Supp. 2d 241, 260 (E.D. Pa. 2011) (approving requested fee in FCRA class action in case where fees were larger than class recovery, finding that “the [percentage of the fund] cross-check’s utility is limited in consumer cases where, as in this case, the total class recovery is relatively small”); *In re Budeprion XL Mktg. & Sales Litig.*, No. 09-MD-2107, 2012 WL 2527021, *20 (E.D. Pa. July 2, 2012) (approving fees for class counsel greater than the recovery for the class); *Fisher v. SD Prot. Inc.*, 948 F.3d 593, 604 (2d Cir. 2020) (“Few plaintiffs would be willing to pay \$22,000 in attorneys’ fees and costs to recover \$11,000 in overtime wages and statutory penalties, and [t]he whole purpose of fee-shifting statutes is to generate attorneys’ fees that are *disproportionate* to the plaintiff’s recovery”) (quotation omitted, emphasis in original); *Garcia v. Tyson Foods, Inc.*, 770 F.3d 1300, 1311 (10th Cir. 2014) (affirming “fee award [that] far exceeded the damages award” because “the fee award need not be proportionate to the damages award” and the district court “acted within its discretion” in approving the award); *Howe v. Hoffman-Curtis Partners Ltd., LLP*, 215 F. App’x 341, 342 (5th Cir. 2007) (affirming \$129,805 attorneys’ fee award that exceeded the \$23,357 damages award because “it is not uncommon that attorney fee requests can exceed the amount of judgment in the case by many multiples”). Here, where the requested fee equals the amount recovered for the Class and is significantly less than Class Counsel’s lodestar, the cross-check weighs in favor of approval.

1. Class Counsel’s Customary Hourly Rates are Reasonable

“A reasonable hourly rate is the market rate prevailing in the relevant legal community.” *Doe v. Terhune*, 121 F. Supp. 2d 773, 781 (D.N.J. 2000). “To determine a reasonable hourly rate, the Court must assess the experience and skill of the prevailing party’s attorney[] and compare [his] rate[] to the rate[] prevailing in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation.” *Shelton v. Restaurant.com Inc.*, No. 10–824, 2016 WL 7394025, at *3 (D.N.J. Dec. 21, 2016) (internal quotation omitted). Further, in this determination, “an attorney’s customary billing rate is the proper starting point.” *Alexander v. NCO Fin. Sys., Inc.*, 2011 WL 2415156, *4 (E.D. Pa. June 16, 2011); *see also Student Pub. Interest Research Grp. of N.J., Inc. v. AT&T Bell Labs.*, 842 F.2d 1436, 1445 (3d Cir. 1988) (attorney’s usual billing rate can provide courts “an efficient and fair short cut” to determining reasonable hourly rate).

As reflected in the accompanying Hashmall Declaration, the customary hourly rates of Class Counsel include rates from \$285-450 for support staff and paralegals, \$770 for senior attorneys, and \$1,180 for executive shareholders. Class Counsel in this matter are experienced in the field of FCRA class action litigation and maintain a nationwide practice. (*See, e.g.*, ECF Nos. 41-2, 41-4; *McKey v. TenantReports.com, LLC*, No. 22-cv-01908-GJP, ECF No. 42 at 4 n.2.) Where, as here, lead counsel are highly regarded for their skill in the relevant practice area, a higher hourly rate is generally approved. *Alexander*, 2011 WL 2415156, at *5 (“[Attorney]’s high level of experience and [] reputation in the field . . . supports a finding that [the attorney]’s hourly rate should fall at the high end of the market rate range.”); *Perry v. FleetBoston Fin. Corp.*, 229 F.R.D. 105, 121 (E.D. Pa. 2005) (in FCRA case, finding “significant skill and experience in consumer class action litigation” to support approving customary rates for timekeepers).

Class Counsel's rates are comparable with hourly rates approved in the Third Circuit for class action litigation and have been approved by courts in this District as recently as one month ago. *See, e.g., McKey v. TenantReports.com, LLC*, No. 22-cv-01908-GJP, ECF No. 42 at 4 n.2 (E.D. Pa. Feb. 27, 2024) (approving substantially same set of timekeepers and their customary hourly rates in a lodestar cross-check of requested attorney fees); *Devlin v. Ferrandino & Son, Inc.*, No. 15-4976, 2016 WL 7178338, *10 (E.D. Pa. Dec. 9, 2016) (“[T]he hourly rates for Class Counsel [Berger Montague PC and co-counsel] are well within the range of what is reasonable and appropriate in this market. That is, the hourly charged rates for the attorneys are the same as the regular current rates charged for their services in standard non-class matters, including contingent and non-contingent matters.”); *In re: Domestic Drywall Antitrust Litigation*, No. 2:13-md-2437-MMB, ECF No. 767 (E.D. Pa. July 17, 2018) (finding “the rates claimed [by Berger Montague PC among others] are well within the range of rates charged by counsel in this district in complex cases”); *In re Flonase Antitrust Litig.*, 291 F.R.D. 93, 106, 112 (E.D. Pa. 2013) (approving hourly rates of \$275-\$750); *Moore v. GMAC Mortg.*, No. 07-4296, 2014 WL 12538188, *2 (E.D. Pa. Sept. 19, 2014) (attorney rates “reasonably range[d]” from \$325-\$860); *In re Merck & Co. Vytorin ERISA Litig.*, No. 08-cv-285, 2010 WL 547613, *13 (D.N.J. 2010) (approving hourly rates from \$105 to \$835); *McGee v. Con’t Tire N. Am., Inc.*, No. 06-6234, 2009 WL 539893, *18 (D.N.J. March 4, 2009) (finding attorney rates of \$495 and \$600 to be reasonable).

2. The Hours Expended Were Reasonable

In determining if the hours expended were appropriate, the Court “should focus on the significance of the overall relief obtained by the plaintiff in relation to the hours reasonably expended on the litigation.” *Hensley*, 461 U.S. at 435. Where the relief obtained is significant, the plaintiff’s “attorney should recover a fully compensatory fee.” *Id.* “Normally this will

encompass all hours reasonably expended on the litigation.” *Tenaflly Eruv Assoc., Inc. v. Borough of Tenaflly*, 195 Fed. App’x. 92, 96-7 (3d Cir. 2006). The Court may assume that counsel “exercise[s]” “billing judgment and sensitivity” in their submitted fees. *Doe v. Terhune*, 121 F. Supp. 2d 773, 784 (D.N.J. 2000).

Class Counsel have expended 366 hours to date. (Hashmall Decl. ¶ 6.) All of the time expended was (i) in furtherance of the litigation and settlement here, (ii) was non-duplicative, (iii) illustrative of Counsel’s efficiency in using non-shareholder attorneys to do the majority of the work on litigation, and (iv) was necessary to the results obtained. (*Id.*, Ex. A.) Moreover, Counsel submit the detailed time entries with the Hashmall Declaration here to further support the record. *See, e.g., G&G Closed Circuit Events, LLC v. D. Franco & Investments, LLC*, 2023 WL 7002335, *1 (D.N.J. Oct. 20, 2023) (where counsel detailed hours spent on drafting complaint, sending correspondence, with no redundant or excessive entries, total hours expended found to be reasonable); *Vassallo v. Fox*, 2005 WL 757353, *3 (E.D. Pa. April 5, 2005) (detailed hours regarding discovery activities, among other entries, found to be reasonable); *DirecTV, Inc. v. Clark*, 2007 WL 2212608, *4 (D.N.J. July 27, 2007) (“compensable activities include the preparation of filing the lawsuit, background research, productive attorney discussions and strategy sessions, negotiations, routine activities such as making telephone calls and reading mail related to the case...time spent drafting and litigating a fee application.”), *see also id.* at *5 (where counsel delegated work to associates where appropriate, such as “drafting motions and briefs, performing discovery,” hours were reasonable).

Further, when set against the backdrop of the noteworthy relief Class Counsel obtained for the Settlement Class through those expended hours, the reasonableness is clear. *See, e.g., Hensley*, 461 U.S. at 435. Here, should the Court approve the contemplated deductions from the fund for

settlement administration expenses and service awards, and assuming that 10% of the Claim Form group submit timely and valid claim forms, the net monetary recovery per Class Member is \$194. This expected recovery is a substantial percentage of the likely award should the case have proceeded all the way through a final judgment in Plaintiffs' favor. *See City of Detroit v. Grinnell Corp.*, 495 F.2d 448, 455 n.2 (2d Cir. 1974), *abrogated on other grounds Goldberger v. Integrated Res., Inc.*, 209 F.3d 43 (2d Cir. 2000) (“[T]here is no reason, at least in theory, why a satisfactory settlement could not amount to a hundredth or even a thousandth part of a single percent of the potential recovery”). The recovery also compares favorably with other settlements of similar claims. *See, e.g., Roe v. IntelliCorp Records, Inc.*, No. 12-2288, ECF No. 139 (N.D. Ohio June 5, 2014) (final approval of settlement of alleged inaccurate reporting, and other FCRA claims, providing for \$50- \$270 net per class member); *Ryals v. HireRight Sols. Inc.*, No. 09-625, ECF No. 127 (E.D. Va. Dec. 22, 2011) (final approval of settlement involving §1681e(b) claims, providing \$15-\$200 gross per class member recovery); *Ori v. Fifth Third Bank, Fiserv, Inc.*, No. 08-432, ECF No. 217 (E.D. Wis. Jan. 10, 2012) (final approval of settlement of alleged inaccurate mortgage loan reporting, claims-made, each claimant receiving approximately \$55); *Speers v. Pre-Employ.com, Inc.*, No. 13-1849, ECF No. 83 (D. Or. Feb. 10, 2016) (final approval of settlement of failure to maintain strict procedures when reporting adverse public record information, resulting in approximately \$153 net per class member); *Villaflor v. Equifax Info. Servc. LLC*, No. 09-329, ECF No. 177 (N.D. Cal. May 3, 2011) (final approval of settlement of §1681e(b) claims, providing credit monitoring for class members with a retail value of \$155).

3. No Multiplier is Sought, Further Supporting the Requested Amount

Class Counsel's lodestar and costs result in a negative multiplier of roughly 0.75 against the requested amount of \$225,000. The fact that Class Counsel are discounting their lodestar,

which is reasonable in and of itself above, makes the requested fee unquestionably reasonable. *McDonough v. Toys R Us, Inc.*, 80 F. Supp. 3d 626, 657 (E.D. Pa. 2015) (request for negative multiplier was “well under the generally acceptable range and provides strong support for approving the fee request”); *City of Providence v. Aeropostale, Inc.*, 2014 WL 1883494, *13 (S.D.N.Y. May 9, 2014) (negative multiplier “affords additional evidence that the requested fee is reasonable.”).

In this Circuit, as noted in *In re Prudential*, it is recognized that “[m]ultiples ranging from one to four are frequently awarded in common fund cases when the lodestar method is applied.” *In re Prudential Ins. Co. Am. Sales Prac. Litig. Agent Actions*, 148 F.3d 283, 341 (3d Cir. 1998) (quoting 3 NEWBERG & CONTE, NEWBERG ON CLASS ACTIONS, §14.03 at 14-5 (3d ed. 1992)). This reasoning has not diminished over time and has been repeatedly recognized by courts in the Third Circuit. *See, e.g., Alexander v. Wash. Mutual, Inc.*, No.07-4426, 2012 WL 6021103, *4 (E.D. Pa. Dec. 4, 2012) (citing *In re Prudential*, 148 F.3d at 283); *In re Diet Drugs*, 582 F.3d at 545 n.42 (same); *In re Cendant Corp. PRIDES Litig.*, 243 F.3d 722, 742 (3d Cir. 2001) (limiting the award to a multiplier of three where liability was conceded by the defendant and was “consistent with the principle that multiples ranging from one to four are frequently awarded”); *In re Safety Components, Inc. Sec. Litig.*, 166 F. Supp. 2d 72, 104 (D.N.J. 2001) (multiplier of one to four is the norm); *In re Am. Investors Life Ins. Co. Ann. Mktg. & Sales Practices Litig.*, 263 F.R.D. 226, 244 (E.D. Pa. 2009) (noting that within the Third Circuit multiples ranging from one to four are frequently awarded and approving a multiplier of 2.3); *Nichols v. Smithkline Beecham Corp.*, No. 00-6222, 2005 WL 950616, *24 (E.D. Pa. Apr. 22, 2005) (recognizing that the Third Circuit awarded multipliers ranging from 1 to 4 and approving a multiplier of 3.15); *In re Genta Sec. Litig.*, No. 04-2123-JAG, 2008 WL 2229843, at *11 (D.N.J. May 28, 2008) (approving multiplier

of 3.72 since it is well within the range identified in *In re Prudential*); *Perry v. FleetBoston Fin. Corp.*, 229 F.R.D. 105, 123 (E.D. Pa. 2005) (awarding 1.5 multiplier in FCRA case, as “[t]he type of litigation undertaken by class counsel here, which addresses important consumer concerns that would likely be ignored without such class action lawsuits, must be encouraged.”).

Here, where the sought award is *less* than Class Counsel’s reasonable lodestar, even without considering out-of-pocket costs and future work on the matter, and where the amount will not reduce the recovery for the Class, the approval of the award is certainly appropriate.

B. The Class Representative Service Awards are Appropriate and Should be Approved

“[C]ourts routinely approve incentive awards to compensate named plaintiffs for the services they provided and the risks they incurred during the course of the class action litigation.” *Cullen v. Whitman Med. Corp.*, 197 F.R.D. 136, 145 (E.D. Pa. 2000) (internal quotation omitted); *see also In re CertainTeed Fiber Cement Siding Litig.*, 303 F.R.D. 199, 225 (E.D. Pa. 2014) (stating similar). “It is particularly appropriate to compensate named representative plaintiffs with incentive awards where they have actively assisted plaintiffs’ counsel in their prosecution of the litigation for the benefit of a class.” *Fleisher v. Fiber Comp., LLC*, No. 12-1326, 2014 WL 866441, *15 (E.D. Pa. March 5, 2014).

Here, Plaintiffs played an integral role to the case, providing information and documents, preparing and sitting for their full day depositions, as did their spouses, corresponding with Counsel, and reviewing and approving the Settlement Agreement. The amount requested in recognition of their efforts is modest, \$7,500 for each, in line with those granted in this Circuit, and not out of proportion to the recovery of the other Class Members. *See Chakejian v. Equifax Info. Servs., LLC*, 275 F.R.D. 201, 220 (E.D. Pa. 2011) (approving \$15,000 per class representative in incentive awards in FCRA case, where members of the class received injunctive relief and free

credit monitoring); *see also In re Ins. Brokerage Antitrust Litig.*, 282 F.R.D. 92, 125 (D.N.J. 2012) (approving \$5,000 incentive awards for each class representative); *In re Am. Inv. Ins. Co. Annuity Mktg. & Sales Prac. Litig.*, 263 F.R.D. 226, 245 (E.D. Pa. 2009) (approving awards of \$5,000-\$10,500); *McIntyre v. RealPage, Inc.*, No. 18-CV-03934, 2023 WL 2643201, at *4 (E.D. Pa. Mar. 24, 2023) (approving award of \$10,000 to named plaintiff in FCRA class action); *Tweedie v. Waste Pro of Fla., Inc.*, No. 19-CV-1827, 2021 WL 5843111, at *3 (M.D. Fla. Dec. 9, 2021) (\$7,500 to named plaintiff in FCRA class action).

IV. CONCLUSION

Based on the foregoing, the Court should approve the requested payments, specifically: (1) attorneys' fees to Class Counsel in the amount of \$225,000 to be paid by Defendant separately from the common fund; and (2) Class Representative Service Awards of \$7,500 to each of the Named Plaintiffs to be paid from the settlement fund.

Dated: March 21, 2024

/s/Joseph C. Hashmall
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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Jason Lee Hinkel, Sr. and Narily Noon,
individually and as representatives of the
Class,

Plaintiffs,

v.

Universal Credit Services, LLC,

Defendant.

Case No. 2:22-cv-01902-KBH

**DECLARATION OF JOSEPH C.
HASHMALL IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES AND SERVICE
AWARDS**

I, Joseph C. Hashmall, hereby declare as follows:

1. I am one of Class Counsel in the above-captioned matter.
2. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees and Named Plaintiff Service Awards.
3. Before taking the case, Class Counsel negotiated a customary contingency fee agreement with the Plaintiffs, with the understanding that the amount would be an appropriate incentive for Class Counsel to take on the financial risks involved in the representation. Class Counsel also agreed to advance all costs. Class Counsel have worked without compensation or reimbursement for their time and have paid all out-of-pocket expenses necessary to litigate and resolve the case.
4. Prior to reaching the settlement in this matter, Class Counsel had undertaken, among other things, (1) investigating the claims, drafting and filing the complaint, (2) propounding and responding to written discovery requests, (3) taking the deposition of Defendant's 30(b)(6) representative, (4) reviewing and analyzing document and data productions from Defendant, including retaining an expert to assist and ultimately prepare a report, (5) pursuing third party

discovery with Defendant's data vendor, (6) preparing for and defending Plaintiffs' and their spouses' depositions, (7) conducting arms-length negotiations, working to finalize the Terms Sheet, and reviewing the draft Settlement Agreement, (8) drafting the motion for preliminary settlement approval.

5. Class Counsel will continue efforts in responding to settlement-related inquiries and monitoring the settlement administration process, and draft and prepare to argue the motion for final approval of the settlement.

6. To date, Class Counsel have expended 365.9 hours on this matter, resulting in \$274,000 in lodestar calculated at Class Counsel's normal hourly rates. A summary table of timekeepers and their rates, attorney years of experience, and hours worked on this matter is below, and detailed fee entries are attached hereto as **Exhibit A**, redacted for privilege.

Timekeeper	Position	Atty. Years of Exp.	Hourly Rate	Hours Worked	Lodestar
Hashmall, Joseph	Senior Counsel	13	\$770	259	\$199,430
Hibray, Jean	Paralegal		\$450	62.8	\$28,260
Drake, Eleanor Michelle	Executive Shareholder	23	\$1180	37.7	\$44,486
Gionnette, Julie	Legal Assistant		\$285	6.4	\$1,824
Totals				365.9	\$274,000

7. To date, Class Counsel have also expended \$23,533.37 in out-of-pocket costs that have not been reimbursed.

8. Notice was distributed to the Settlement Class on February 13, 2024, and the objections deadline is April 13, 2024. As of today's date, zero objections have been received.

9. Plaintiffs have played a valuable role in bringing this action to a successful resolution. Among other things, the Class Representatives (1) provided information for the complaint and reviewed the same prior to filing, (2) responded to extensive written discovery requests and located and provided fulsome sets of documents for production, (3) prepared and sat

for full-day depositions, as did their spouses, (4) consulted with Counsel during settlement negotiations, and (5) reviewed and approved the Settlement Agreement.

10. Each of the lead attorneys who worked on this case has a wealth of experience:

a. E. Michelle Drake:

E. Michelle Drake is an Executive Shareholder in the Firm's Minneapolis office. Ms. Drake focuses her practice primarily on consumer protection, improper credit reporting, and financial services class actions. Ms. Drake helped achieve one of the largest class action settlements in a case involving improper mortgage servicing practices associated with force-placed insurance, resulting in a settlement valued at \$110 million for a nationwide class of borrowers who were improperly force-placed with overpriced insurance. Ms. Drake also served as liaison counsel and part of the Plaintiffs' Steering Committee on behalf of consumers harmed in the Target data breach, a case she helped successfully resolve on behalf of over ninety million consumers whose data was affected by the breach. More recently, Michelle has been successful in litigating numerous cases protecting consumers' federal privacy rights under the Fair Credit Reporting Act, securing settlements valued at over \$10 million on behalf of tens of thousands of consumers harmed by improper background checks and inaccurate credit reports in the last two years alone. Ms. Drake was admitted to the bar in 2001 and has since served as lead class counsel in over fifty class and collective actions alleging violations of the Fair Credit Reporting Act, the Fair Debt Collection Practices Act, the Fair Labor Standards Act, various states' unfair and deceptive trade practices acts, breach of contract and numerous other pro-consumer and pro-employee causes of action. Ms. Drake serves on the Board of the National Association of Consumer Advocates, is a member of the Partner's Council of the National Consumer Law Center, and is an At-Large Council Member for the Consumer Litigation Section for the Minnesota State Bar Association. She was named as a Super Lawyer in 2013-2021 and was named as a Rising Star prior to that. Ms. Drake was also appointed to the Federal Practice Committee in 2010 by the United States District Court for the District of Minnesota. She has been quoted in the New York Times and the National Law Journal, and her cases were named as "Lawsuits of the Year" by Minnesota Law & Politics in both 2008 and 2009.

b. Joe Hashmall:

Joe Hashmall, Senior Counsel, is a member of the Firm's Consumer Protection practice group. In that practice group, Mr. Hashmall primarily focuses on consumer class actions concerning financial and credit

reporting practices. Mr. Hashmall is a graduate of the Grinnell College and the Cornell University School of Law. During law school, Mr. Hashmall served as the Executive Editor of the Cornell Legal Information Institute's Supreme Court Bulletin and as an Editor for the Cornell International Law Journal. Mr. Hashmall has also worked as a law clerk for President Judge Bonnie B. Leadbetter of the Pennsylvania Commonwealth Court and for the Honorable David J. Ten Eyck of the Minnesota District Court.

11. Berger Montague PC's time records are maintained in accordance with industry standards to ensure reliability and transparency. The firm's formal policy requires all timekeepers—including attorneys and support staff—to keep records of time worked contemporaneously and to provide sufficient detail to convey the nature and merit of the work performed. To ensure each time entry contains sufficient detail, Berger Montague requires time entries to include both matter numbers (corresponding to the specific case) and task codes (corresponding to the type of work performed). BMPC uses the widely-accepted ABA Litigation Code Set, which includes 29 task codes spread across 5 stages of litigation (e.g., Pre-Trial Pleadings and Motions, Discovery, etc.) to allocate time to particular tasks. This model, endorsed by courts,¹ ensures that time is billed in a uniform and task-oriented manner.² Timekeepers are also required to provide narrative descriptions setting forth the case-specific tasks associated with each time entry.

12. This manner of time-keeping, with contemporaneous records and detailed descriptions broken down by task, provides a level of accountability that courts nationwide routinely recommend when scrutinizing applications for attorneys' fees. *Deary v. City of Gloucester*, 9 F.3d. 191, 197-98 (1st Cir. 1993) ("In order to recover fees, attorneys must submit a full and precise accounting of their time, including specific information about number of hours, dates, and the nature of the work performed."); *Bode v. United States*, 919 F.2d 1044, 1047 (5th

¹ See *Yahoo!, Inc. v. Net Games, Inc.*, 329 F. Supp. 2d 1179, 1189 (N.D. Cal. 2004) ("The ABA template commends itself to parties applying for fee awards."); *Albion Pac. Prop. Res., LLC v. Seligman*, 329 F. Supp. 2d 1163, 1174 (N.D. Cal. 2004) (same).

² American Bar Association, Uniform Task-Based Management System, available at https://www.americanbar.org/groups/litigation/resources/uniform_task_based_management_system/ ("The Litigation Code Set has formed the basis for most, if not all, schemes to record and bill time on an hourly basis.").

Cir. 1990) (collecting cases) (“[C]ourts customarily require the applicant to produce contemporaneous billing records or other sufficient documentation so that the district court can fulfill its duty to examine the application....”).

The foregoing statement is made under penalty of perjury, and is true and correct to the best of my knowledge and belief.

Date: March 21, 2024

/s/Joseph C. Hashmall

Joseph C. Hashmall

EXHIBIT A

empname	entrydate	LodestarRate	hrs	LodestarAmount	narrative
Hashmall, Joseph	2/21/2022	\$770.00	0.4	308	Review of initial email and client documents from Hans Lodge, internal emails regarding potential case
Hashmall, Joseph	2/22/2022	\$770.00	0.3	231	Review of client documents, internal emails regarding potential case
Hashmall, Joseph	2/22/2022	\$770.00	0.3	231	Opening case file, internal email regarding same
Hashmall, Joseph	2/22/2022	\$770.00	0.3	231	Drafting legal services agreement
Hashmall, Joseph	2/22/2022	\$770.00	0.3	231	Drafting cocounsel agreement
Hashmall, Joseph	2/22/2022	\$770.00	2.8	2156	Drafting complaint
Hashmall, Joseph	2/22/2022	\$770.00	0.2	154	Email to cocounsel regarding filing of case, time ██████████
Hashmall, Joseph	2/23/2022	\$770.00	0.5	385	Review of ██████████, internal emails and email to cocounsel regarding same
Hashmall, Joseph	2/24/2022	\$770.00	0.5	385	Emails to cocounsel regarding ██████████
Hashmall, Joseph	2/25/2022	\$770.00	0.2	154	Internal email regarding upcoming ██████████
Hashmall, Joseph	2/25/2022	\$770.00	0.5	385	Initial client interview
Hashmall, Joseph	2/25/2022	\$770.00	0.7	539	Review of legal services agreement, cocounsel agreement, emails to ██████████ cocounsel attaching same
Hashmall, Joseph	2/25/2022	\$770.00	0.8	616	Drafting complaint, internal emails regarding same
Hibray, Jean	2/25/2022	\$450.00	0.2	90	Prepare DocuSigns ██████████ and co-counsel agreement
Hashmall, Joseph	3/1/2022	\$770.00	0.2	154	Internal email regarding status of ██████████
Hashmall, Joseph	3/2/2022	\$770.00	0.1	77	Call with Michelle Drake re draft complaint
Hashmall, Joseph	3/2/2022	\$770.00	0.1	77	Email to Joseph McClelland regarding case status
Hashmall, Joseph	3/4/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	3/7/2022	\$770.00	0.5	385	Emails with referring counsel regarding ██████████
Hashmall, Joseph	3/8/2022	\$770.00	0.5	385	Call with ██████████
Hashmall, Joseph	3/8/2022	\$770.00	0.5	385	Drafting ██████████, email ██████████ and internal email regarding same
Hashmall, Joseph	3/8/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hibray, Jean	3/8/2022	\$450.00	0.2	90	Prepare & send ██████████
Hashmall, Joseph	3/9/2022	\$770.00	2.2	1694	Edits to draft complaint ██████████, internal emails regarding review of and filing of same
Hashmall, Joseph	3/16/2022	\$770.00	0.2	154	Internal emails regarding draft complaint
Hashmall, Joseph	3/17/2022	\$770.00	0.2	154	Litigation team meeting
Hashmall, Joseph	3/18/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	3/21/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	3/22/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	3/23/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	3/24/2022	\$770.00	0.3	231	Emails to both clients regarding timeline of filing of complaint
Hashmall, Joseph	3/28/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	3/29/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Hashmall, Joseph	4/1/2022	\$770.00	0.1	77	Internal email regarding draft complaint
Drake, Eleanor Michelle	4/2/2022	\$1,180.00	0.9	1062	review redline and revise draft complaint
Hashmall, Joseph	4/4/2022	\$770.00	0.3	231	Email to client regarding draft complaint
Hashmall, Joseph	4/4/2022	\$770.00	1	770	Review of Michelle Drake's edits to complaint, further edits to same
Hashmall, Joseph	4/4/2022	\$770.00	0.1	77	Email to Shanon Carson regarding filing of complaint
Hibray, Jean	4/4/2022	\$450.00	0.1	45	Prepare ██████████ in complaint
Hashmall, Joseph	4/6/2022	\$770.00	0.5	385	Pre-filing review of complaint, internal emails regarding same
Hashmall, Joseph	4/6/2022	\$770.00	0.5	385	Emails with clients regarding ██████████
Hashmall, Joseph	4/6/2022	\$770.00	0.1	77	Litigation team meeting
Hibray, Jean	4/6/2022	\$450.00	1	450	Format, proof complaint, prep & DocuSign ██████████
Hashmall, Joseph	4/8/2022	\$770.00	0.3	231	Emails to clients regarding ██████████
Hibray, Jean	4/8/2022	\$450.00	0.3	135	Finalize initiating docs for Hinkel/Noon, file case
Hibray, Jean	4/11/2022	\$450.00	0.7	315	Review court's acceptance of new case, prepare service letter and packet, send to Metro Legal; prepare preservation letters, fully executed retainers, send to clients.
Hashmall, Joseph	4/22/2022	\$770.00	0.2	154	Internal emails regarding status of service of complaint
Hibray, Jean	4/22/2022	\$450.00	0.1	45	Emails re service issue
Hashmall, Joseph	4/25/2022	\$770.00	0.3	231	Internal email regarding service of complaint, review of documents for service address, review of documents for service address
Hibray, Jean	4/25/2022	\$450.00	0.1	45	Review service response, send alternate address
Hibray, Jean	4/28/2022	\$450.00	0.3	135	Review service confirmation, file affidavit re same
Hibray, Jean	4/28/2022	\$450.00	0.1	45	Docket response/removal
Hashmall, Joseph	5/3/2022	\$770.00	0.1	77	Litigation team meeting
Hashmall, Joseph	5/13/2022	\$770.00	0.2	154	Email with opposing counsel regarding extension of time

Hashmall, Joseph	5/16/2022	\$770.00	0.1	77	Review of draft pro hoc application
Gionnette, Julie	5/16/2022	\$285.00	0.3	85.5	download and review docket entries filed in Phil Common Pleas
Hibray, Jean	5/16/2022	\$450.00	0.1	45	Review removal, email re same
Hibray, Jean	5/16/2022	\$450.00	0.4	180	Draft pro hac application materials
Hibray, Jean	5/17/2022	\$450.00	0.3	135	Finalize and file pro hac application for J Hashmall, check new judge's procedures
Hibray, Jean	5/17/2022	\$450.00	0.2	90	Call and email re opposing's docket error
Hashmall, Joseph	5/18/2022	\$770.00	0.6	462	Review of and edits to draft discovery
Gionnette, Julie	5/18/2022	\$285.00	0.1	28.5	download and review docket entry
Hibray, Jean	5/18/2022	\$450.00	0.8	360	Draft RFPs and Interrogs
Hashmall, Joseph	5/19/2022	\$770.00	0.2	154	Review of draft motion for extension, email to opposing counsel regarding same
Gionnette, Julie	5/20/2022	\$285.00	0.2	57	download and review docket entries; update calendar deadline
Hashmall, Joseph	5/23/2022	\$770.00	0.7	539	Review of Court's scheduling order, review of draft discovery, internal emails regarding service of same
Gionnette, Julie	5/23/2022	\$285.00	0.4	114	download and review order; calendar deadlines
Hibray, Jean	5/23/2022	\$450.00	0.2	90	Review initial order commencing discovery, docket accordingly
Hibray, Jean	5/23/2022	\$450.00	0.5	225	Proof, e-serve RFPs, Interrogs.
Hashmall, Joseph	5/24/2022	\$770.00	0.1	77	Email to opposing counsel regarding pro hoc motions
Hashmall, Joseph	5/24/2022	\$770.00	0.2	154	Review of case status and deadlines
Hashmall, Joseph	5/31/2022	\$770.00	0.2	154	Review of case status and deadlines
Hashmall, Joseph	6/1/2022	\$770.00	0.3	231	Review of draft initial disclosures, internal email regarding same
Gionnette, Julie	6/1/2022	\$285.00	0.2	57	download and review docket entries
Hibray, Jean	6/1/2022	\$450.00	0.5	225	Draft initial disclosures
Hashmall, Joseph	6/2/2022	\$770.00	0.4	308	Review of draft initial disclosures, internal email regarding service of same
Hibray, Jean	6/6/2022	\$450.00	0.1	45	Finalize initial disclosures, e-serve
Gionnette, Julie	6/7/2022	\$285.00	0.1	28.5	download and review docket entry
Gionnette, Julie	6/10/2022	\$285.00	0.2	57	download and review docket entries
Gionnette, Julie	6/13/2022	\$285.00	0.1	28.5	download and review docket entry
Gionnette, Julie	6/14/2022	\$285.00	0.1	28.5	download and review docket entry
Hashmall, Joseph	6/15/2022	\$770.00	0.1	77	Email to Hans Lodge regarding [REDACTED]
Hashmall, Joseph	6/16/2022	\$770.00	0.2	154	Internal email regarding third party discovery
Hashmall, Joseph	6/16/2022	\$770.00	0.2	154	Call with Michelle Drake regarding next steps in case
Hibray, Jean	6/16/2022	\$450.00	0.7	315	Draft MeridianLink subpoena. Finalize and e-serve on opposing, email to MeridianLink counsel.
Gionnette, Julie	6/17/2022	\$285.00	0.3	85.5	download and review docket entries and update calendar deadline
Hibray, Jean	6/17/2022	\$450.00	0.2	90	Review discovery requests to Hinkel e-served by opposing
Hashmall, Joseph	6/20/2022	\$770.00	0.5	385	Review of Defendant's answer
Hashmall, Joseph	6/20/2022	\$770.00	0.3	231	Review of Defendant's discovery, internal email regarding response to same
Hashmall, Joseph	6/21/2022	\$770.00	0.2	154	Email to counsel for Meridian Link regarding subpoena service
Hashmall, Joseph	6/21/2022	\$770.00	0.2	154	Email exchange with opposing counsel regarding discovery response deadline
Hibray, Jean	6/22/2022	\$450.00	0.1	45	Review email re extension on responses, docket same
Hashmall, Joseph	6/23/2022	\$770.00	0.1	77	Email to counsel for Meridian Link regarding response date to subpoena
Hibray, Jean	6/23/2022	\$450.00	1	450	Review requests to plaintiff, set up response templates
Hibray, Jean	6/30/2022	\$450.00	2	900	Begin drafting client responses to discovery requests.
Hibray, Jean	7/1/2022	\$450.00	2.5	1125	Drafting client responses to discovery requests, including caselaw research for objections
Hashmall, Joseph	7/5/2022	\$770.00	0.2	154	Review of [REDACTED] clients
Hibray, Jean	7/5/2022	\$450.00	0.6	270	Review J Hashmall comments on plaintiff's responses, email client [REDACTED]
Hibray, Jean	7/5/2022	\$450.00	0.3	135	Draft, finalize and [REDACTED] letters (2)
Hibray, Jean	7/6/2022	\$450.00	1	450	Call with client to [REDACTED], draft and send follow up email re [REDACTED]
Hashmall, Joseph	7/7/2022	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	7/7/2022	\$1,180.00	0.1	118	team meeting re case status, upcoming deadlines, and next steps in litigation
Hashmall, Joseph	7/11/2022	\$770.00	0.2	154	Email to opposing counsel regarding 26(f) report
Hashmall, Joseph	7/11/2022	\$770.00	0.8	616	Drafting Rule 26(f) report, internal emails regarding same
Hibray, Jean	7/11/2022	\$450.00	0.3	135	Review judicial preferences, set up template joint report
Hashmall, Joseph	7/12/2022	\$770.00	0.3	231	Rule 26(f) call with opposing counsel
Hashmall, Joseph	7/12/2022	\$770.00	0.2	154	Call and emails with Michelle Drake regarding 26(f) report
Hashmall, Joseph	7/13/2022	\$770.00	0.2	154	Email exchange with opposing counsel regarding discovery extension
Hibray, Jean	7/13/2022	\$450.00	0.1	45	Review email re extension, docket accordingly
Gionnette, Julie	7/14/2022	\$285.00	0.1	28.5	download and review docket entry

Hashmall, Joseph	7/14/2022	\$770.00	0.7	539	Review of opposing counsel's edits to 26(f) report, email exchange with opposing counsel regarding filing of same
Hashmall, Joseph	7/14/2022	\$770.00	0.3	231	Internal emails regarding Plaintiff's discovery responses, edits to same
Hibray, Jean	7/14/2022	\$450.00	0.2	90	Email with J Hashmall re [REDACTED]
Hashmall, Joseph	7/15/2022	\$770.00	0.2	154	Review of objections to subpoena from Meridian Link, email to counsel for Meridian Link regarding same
Hashmall, Joseph	7/15/2022	\$770.00	0.1	77	Email to opposing counsel regarding protective order
Hashmall, Joseph	7/15/2022	\$770.00	0.2	154	Internal emails regarding Plaintiff's discovery responses
Hibray, Jean	7/15/2022	\$450.00	0.1	45	Review [REDACTED] client
Hibray, Jean	7/16/2022	\$450.00	1.5	675	Edit discovery responses, review docs for production, email attorney
Hashmall, Joseph	7/18/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding Meridian Link subpoena
Hashmall, Joseph	7/18/2022	\$770.00	0.6	462	Review of draft Plaintiff discovery responses and proposed production, internal email regarding same
Hashmall, Joseph	7/18/2022	\$770.00	0.3	231	Review of draft protective order, emails to opposing counsel regarding same
Hibray, Jean	7/18/2022	\$450.00	0.3	135	Finalize Irogs, send DocuSign [REDACTED]
Hashmall, Joseph	7/19/2022	\$770.00	1.6	1232	Review of Defendant's objections and responses to discovery and Defendant's production, email to Defendant regarding deficiencies in same
Hashmall, Joseph	7/19/2022	\$770.00	0.1	77	Email to counsel to Meridian Link regarding meet and confer
Gionnette, Julie	7/19/2022	\$285.00	0.1	28.5	download and review docket entry
Hibray, Jean	7/19/2022	\$450.00	0.9	405	Bates, scrub [REDACTED] documents for production tomorrow
Hashmall, Joseph	7/20/2022	\$770.00	0.1	77	Email exchange with counsel for Meridian Link regarding meet and confer
Hashmall, Joseph	7/20/2022	\$770.00	0.7	539	Review and approval of Plaintiff's document production
Hibray, Jean	7/20/2022	\$450.00	0.5	225	Proof, finalize written responses, e-serve with production to opposing
Hashmall, Joseph	7/22/2022	\$770.00	0.1	77	Email exchange with Meridian Link counsel regarding meet and confer logistics
Hashmall, Joseph	7/25/2022	\$770.00	0.2	154	Meet and confer call with counsel for Meridian Link regarding subpoena response
Hashmall, Joseph	7/25/2022	\$770.00	0.2	154	Email exchange with Michelle Drake regarding upcoming Rule 16
Hashmall, Joseph	7/27/2022	\$770.00	0.2	154	Attend Rule 16 by video
Hashmall, Joseph	7/27/2022	\$770.00	0.6	462	Review of case file in advance of Rule 16 hearing
Hashmall, Joseph	7/27/2022	\$770.00	0.2	154	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	7/27/2022	\$770.00	0.2	154	Email to counsel for meridian link regarding document production
Hibray, Jean	7/27/2022	\$450.00	0.2	90	Emails re Rule 16
Gionnette, Julie	7/27/2022	\$285.00	0.7	199.5	download and review order from Westlaw; download and review Scheduling Order; calendar all deadlines
Hibray, Jean	7/28/2022	\$450.00	0.4	180	Review scheduling order and associated docketing, email re class cert
Hashmall, Joseph	7/29/2022	\$770.00	0.5	385	Review of Defendant's supplemental document production
Hashmall, Joseph	8/1/2022	\$770.00	0.2	154	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	8/2/2022	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	8/2/2022	\$1,180.00	0.4	472	meet with J Hashmall re produced documents
Drake, Eleanor Michelle	8/2/2022	\$1,180.00	0.1	118	team meeting to discuss next steps in litigation and upcoming deadlines
Hashmall, Joseph	8/3/2022	\$770.00	0.3	231	Review of email from opposing counsel regarding outstanding discovery issues, reply email to same
Hashmall, Joseph	8/4/2022	\$770.00	0.1	77	Email exchange with Meridian Link counsel regarding data production
Hashmall, Joseph	8/5/2022	\$770.00	0.3	231	Internal email regarding next steps in database discovery
Hashmall, Joseph	8/8/2022	\$770.00	0.2	154	Call with Michelle Drake regarding next steps in case
Hashmall, Joseph	8/8/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding outstanding discovery disputes
Drake, Eleanor Michelle	8/8/2022	\$1,180.00	0.4	472	meet with J Hashmall re case status and next steps in litigation
Hashmall, Joseph	8/11/2022	\$770.00	0.2	154	Call with Michelle Drake regarding Meridian Link discovery letter
Hashmall, Joseph	8/11/2022	\$770.00	0.2	154	Email to opposing counsel attaching Meridian Link discovery letter
Hibray, Jean	8/11/2022	\$450.00	0.1	45	Review & respond to [REDACTED]
Hashmall, Joseph	8/15/2022	\$770.00	0.5	385	Edits to draft letter to Meridian Link regarding data production, email to opposing counsel attaching same
Hashmall, Joseph	8/17/2022	\$770.00	0.3	231	Review of Defendant's reproduction of documents, internal emails regarding same
Hibray, Jean	8/17/2022	\$450.00	0.2	90	Review def prod, extract for file
Hashmall, Joseph	8/19/2022	\$770.00	0.2	154	Email to opposing counsel regarding Meridian Link discovery
Hashmall, Joseph	8/29/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding MeridianLink production
Hashmall, Joseph	8/30/2022	\$770.00	0.2	154	Review of status and deadlines in case
Hashmall, Joseph	8/31/2022	\$770.00	0.3	231	Review of Defendant's discovery requests to Noon, internal email regarding same
Hashmall, Joseph	8/31/2022	\$770.00	0.3	231	Call with opposing counsel regarding MeridianLink discovery
Hashmall, Joseph	8/31/2022	\$770.00	0.3	231	Follow up emails with opposing counsel regarding MeridianLink discovery
Hibray, Jean	8/31/2022	\$450.00	0.1	45	Review email with requests [REDACTED], docket same
Drake, Eleanor Michelle	8/31/2022	\$1,180.00	0.4	472	emails with J Hashmall re D proposal on data production
Hashmall, Joseph	9/1/2022	\$770.00	0.5	385	Review of Defendant's proposal regarding Meridian Link production, internal emails regarding response to same
Hashmall, Joseph	9/2/2022	\$770.00	0.8	616	Edits to draft letter regarding Meridian Link discovery, email to opposing counsel attaching same

Drake, Eleanor Michelle	9/2/2022	\$1,180.00	0.5	590	review correspondence with oc re third party discovery, and respond with clarifications to proposal
Hashmall, Joseph	9/8/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding Meridian Link discovery, internal emails regarding same
Hashmall, Joseph	9/12/2022	\$770.00	0.1	77	Litigation team meeting
Hashmall, Joseph	9/12/2022	\$770.00	0.5	385	Review of draft MeridianLink letter from opposing counsel, internal emails regarding same
Drake, Eleanor Michelle	9/12/2022	\$1,180.00	0.1	118	team meeting re next steps in litigation
Hashmall, Joseph	9/13/2022	\$770.00	0.5	385	Finalizing and sending letter regarding Meridian Link discovery
Hibray, Jean	9/14/2022	\$450.00	0.1	45	Email Noon [REDACTED]
Hibray, Jean	9/15/2022	\$450.00	1.7	765	Review [REDACTED], make notes for client call.
Hibray, Jean	9/16/2022	\$450.00	1	450	Discovery call with N Noon
Hibray, Jean	9/16/2022	\$450.00	0.1	45	Call with J Hashmall re [REDACTED]
Hibray, Jean	9/16/2022	\$450.00	0.2	90	Check [REDACTED], email him re same
Hibray, Jean	9/16/2022	\$450.00	0.1	45	Email H Lodge re [REDACTED]
Hibray, Jean	9/16/2022	\$450.00	0.2	90	Highlight [REDACTED], send to J Hashmall for confirmation and comment
Hibray, Jean	9/16/2022	\$450.00	0.6	270	Review post-call notes, draft and send email to N Noon re [REDACTED].
Hashmall, Joseph	9/16/2022	\$770.00	1.8	1386	Review of Plaintiff Noon's draft discovery responses and underlying documents, internal email regarding same
Hashmall, Joseph	9/16/2022	\$770.00	0.1	77	Review of email from MeridianLink counsel regarding production
Hibray, Jean	9/21/2022	\$450.00	0.9	405	Review [REDACTED], being work on updating discovery.
Hashmall, Joseph	9/22/2022	\$770.00	1.1	847	Review of Plaintiff Noon's discovery responses and document production, internal emails regarding same
Hibray, Jean	9/22/2022	\$450.00	0.9	405	Edit draft discovery responses for Noon, email with J Hashmall, [REDACTED].
Hashmall, Joseph	9/23/2022	\$770.00	0.2	154	Review of email from Meridian Link counsel regarding subpoena response, internal emails regarding motion to compel
Hibray, Jean	9/28/2022	\$450.00	0.1	45	Review status of responses, docs, email J Hashmall re same
Hashmall, Joseph	9/29/2022	\$770.00	0.5	385	Call with Michelle Drake regarding Meridian Link motion to compel
Hashmall, Joseph	9/29/2022	\$770.00	0.9	693	Pre-service review of discovery responses and document production, internal emails regarding same
Hashmall, Joseph	9/29/2022	\$770.00	0.5	385	Drafting email to MeridianLink counsel regarding motion to compel
Hibray, Jean	9/29/2022	\$450.00	1	450	Prepare [REDACTED] documents for production, Bates, redact, scrub, load to ShareFile
Hibray, Jean	9/29/2022	\$450.00	0.4	180	Proof, finalize written responses, e-serve with prod on opposing
Hashmall, Joseph	9/30/2022	\$770.00	0.6	462	Review of file, email to opposing counsel regarding meet and confer
Hashmall, Joseph	9/30/2022	\$770.00	0.3	231	Internal email regarding draft 30b6 notice, review of draft of same
Hibray, Jean	9/30/2022	\$450.00	0.1	45	Draft 30b6 notice
Hashmall, Joseph	10/3/2022	\$770.00	0.2	154	Email to opposing counsel regarding meet and confer
Hashmall, Joseph	10/3/2022	\$770.00	0.2	154	Review of email from mediator, email to opposing counsel regarding same
Hashmall, Joseph	10/5/2022	\$770.00	0.6	462	Review of Defendant's discovery responses in advance of meet and confer call with opposing counsel
Hashmall, Joseph	10/6/2022	\$770.00	0.5	385	Meet and confer call with opposing counsel regarding Defendant's discovery responses
Hashmall, Joseph	10/6/2022	\$770.00	0.3	231	Email to opposing counsel following up on meet and confer call regarding Defendant's discovery responses
Hashmall, Joseph	10/6/2022	\$770.00	0.2	154	Review of and edits to draft 30b6 notice, internal email regarding service of same
Hashmall, Joseph	10/6/2022	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	10/6/2022	\$1,180.00	0.1	118	team meeting re next steps in litigation
Hashmall, Joseph	10/7/2022	\$770.00	1.2	924	Beginning to draft motion to compel against MeridianLink, research regarding Local Rule requirements for same
Hibray, Jean	10/7/2022	\$450.00	0.2	90	Finalize & e-serve NOD
Hashmall, Joseph	10/10/2022	\$770.00	0.2	154	Email to MeridianLink counsel regarding production
Hibray, Jean	10/12/2022	\$450.00	0.2	90	Review CD Cal stip rules, prepare shell of joint stipulation for compel
Hashmall, Joseph	10/13/2022	\$770.00	0.2	154	Email exchange with MeridianLink counsel regarding production schedule
Hashmall, Joseph	10/14/2022	\$770.00	0.2	154	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	10/18/2022	\$770.00	0.2	154	Email to MeridianLink counsel regarding production
Hashmall, Joseph	10/18/2022	\$770.00	0.3	231	Email to opposing counsel regarding outstanding discovery
Hashmall, Joseph	10/19/2022	\$770.00	0.2	154	Internal emails regarding supplemental discovery responses in case
Hibray, Jean	10/19/2022	\$450.00	0.3	135	Review Noon irogs, set up supplemental version re: [REDACTED]
Hashmall, Joseph	10/20/2022	\$770.00	0.3	231	Review of draft supplemental discovery responses, internal email regarding same
Hibray, Jean	10/20/2022	\$450.00	0.2	90	Finalize supplemental interrog answers, [REDACTED]
Hibray, Jean	10/20/2022	\$450.00	0.3	135	Bates complaint, e-serve with irog answers.
Hashmall, Joseph	10/24/2022	\$770.00	0.3	231	Downloading and sending internal emails regarding Defendant's supplemental production
Hashmall, Joseph	10/24/2022	\$770.00	0.5	385	Review of Defendant's deposition notices and subpoenas, internal email regarding response to same
Hashmall, Joseph	10/24/2022	\$770.00	0.6	462	Downloading and reviewing data production by MeridianLink, email to MeridianLink counsel regarding same
Hashmall, Joseph	10/25/2022	\$770.00	0.2	154	Internal email regarding Defendant's deposition notices
Hashmall, Joseph	10/25/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding subpoenas to client's spouses
Hibray, Jean	10/25/2022	\$450.00	0.3	135	Review def's subpoenas, Notices, docketing of same
Hashmall, Joseph	10/26/2022	\$770.00	0.3	231	Call with Michelle Drake regarding defendant's subpoenas, response to same

Hashmall, Joseph	10/26/2022	\$770.00	0.3	231	Internal email regarding [REDACTED]
Hibray, Jean	10/26/2022	\$450.00	0.2	90	Call and email plaintiffs re [REDACTED]
Hashmall, Joseph	10/27/2022	\$770.00	0.3	231	Emails and voicemail to clients regarding [REDACTED]
Hashmall, Joseph	10/27/2022	\$770.00	0.7	539	Email exchange with opposing counsel regarding depositions to be conducted by both sides
Hashmall, Joseph	10/27/2022	\$770.00	0.3	231	Call with client Noon regarding [REDACTED]
Hashmall, Joseph	10/27/2022	\$770.00	0.3	231	Internal emails regarding upcoming Noon deposition
Drake, Eleanor Michelle	10/27/2022	\$1,180.00	0.4	472	review redline and revise authenticity declaration
Hashmall, Joseph	10/28/2022	\$770.00	0.2	154	Internal email regarding [REDACTED]
Hashmall, Joseph	10/28/2022	\$770.00	0.4	308	Email to client Hinkel regarding [REDACTED] internal email regarding same
Hashmall, Joseph	10/31/2022	\$770.00	0.4	308	Call with Tim Noon regarding [REDACTED]
Hashmall, Joseph	10/31/2022	\$770.00	0.3	231	Email exchange with client Noon regarding [REDACTED]
Hashmall, Joseph	10/31/2022	\$770.00	0.2	154	Internal emails regarding [REDACTED]
Hibray, Jean	10/31/2022	\$450.00	0.3	135	Call with J Hinkel, emails re same
Hibray, Jean	10/31/2022	\$450.00	0.2	90	Review def's latest subpoena, docket same
Hashmall, Joseph	11/1/2022	\$770.00	0.5	385	Call with Tim Noon regarding [REDACTED], follow up email regarding same
Hashmall, Joseph	11/1/2022	\$770.00	0.6	462	Call with client Hinkel regarding [REDACTED], follow up emails regarding same
Hashmall, Joseph	11/1/2022	\$770.00	0.5	385	Email exchange with opposing counsel regarding upcoming depositions, internal emails regarding same
Hibray, Jean	11/1/2022	\$450.00	0.2	90	Emails re Hinkel
Hibray, Jean	11/1/2022	\$450.00	0.3	135	Review emails re extensions, docketing of same
Hibray, Jean	11/1/2022	\$450.00	0.3	135	Prepare [REDACTED] DocuSign both
Hibray, Jean	11/1/2022	\$450.00	0.2	90	Outreach to T Noon
Hashmall, Joseph	11/2/2022	\$770.00	0.2	154	Call with MeridianLink counsel regarding subpoena response
Hashmall, Joseph	11/2/2022	\$770.00	0.1	77	Call with opposing counsel regarding MeridianLink production
Hashmall, Joseph	11/2/2022	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	11/2/2022	\$1,180.00	0.1	118	team meeting re next steps in litigation
Hibray, Jean	11/2/2022	\$450.00	0.4	180	Call with T Noon
Hashmall, Joseph	11/3/2022	\$770.00	0.6	462	Call and email with client Noon regarding [REDACTED]
Hashmall, Joseph	11/3/2022	\$770.00	0.3	231	Internal email regarding [REDACTED]
Hibray, Jean	11/3/2022	\$450.00	0.1	45	Emails with J Hashmall re [REDACTED]
Hibray, Jean	11/3/2022	\$450.00	0.9	405	Calls with E Hinkel. Follow up email to J Hashmall
Hashmall, Joseph	11/4/2022	\$770.00	0.3	231	Call with Emma Hinkel regarding [REDACTED]
Hashmall, Joseph	11/4/2022	\$770.00	0.3	231	Email and voicemail to opposing counsel regarding upcoming depositions
Hashmall, Joseph	11/4/2022	\$770.00	0.2	154	Email to client Noon regarding [REDACTED]
Hibray, Jean	11/4/2022	\$450.00	0.1	45	Draft and send email to T Noon re [REDACTED]
Hibray, Jean	11/4/2022	\$450.00	0.7	315	Draft responses and objections to T Noon subpoena
Hashmall, Joseph	11/7/2022	\$770.00	0.6	462	Review of draft discovery responses for Mr. Noon, internal email regarding edits to same
Hashmall, Joseph	11/7/2022	\$770.00	0.4	308	Emails to opposing counsel regarding upcoming depositions
Hashmall, Joseph	11/7/2022	\$770.00	0.3	231	Email exchange with Ms. Hinkel regarding [REDACTED]
Hashmall, Joseph	11/7/2022	\$770.00	0.4	308	Review of schedule in case, email to opposing counsel regarding extension of discovery, internal email regarding same
Hashmall, Joseph	11/7/2022	\$770.00	0.3	231	Call with opposing counsel regarding settlement, internal email following up on same
Hibray, Jean	11/7/2022	\$450.00	0.4	180	Prepare and e-serve NOD, send to Lexitas for scheduling
Hibray, Jean	11/7/2022	\$450.00	0.2	90	Review procedures for extensions
Hashmall, Joseph	11/8/2022	\$770.00	0.8	616	Internal email regarding request for extension of time, review of and edits to draft letter regarding same, email to opposing counsel attaching same
Hashmall, Joseph	11/8/2022	\$770.00	0.4	308	Emails with client Noon regarding [REDACTED]
Hashmall, Joseph	11/8/2022	\$770.00	0.2	154	Internal email regarding judicial assignment
Hibray, Jean	11/8/2022	\$450.00	0.2	90	Draft extension letter
Hibray, Jean	11/8/2022	\$450.00	0.1	45	Docket extended deposition
Hibray, Jean	11/8/2022	\$450.00	0.1	45	Email T Noon re [REDACTED]
Hashmall, Joseph	11/9/2022	\$770.00	0.9	693	Call with opposing counsel regarding case schedule and other case management issues, editing proposed letter to the court regarding same, email to opposing counsel attaching letter
Hashmall, Joseph	11/10/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding request for extension
Hashmall, Joseph	11/10/2022	\$770.00	0.1	77	Email to client Noon regarding [REDACTED]
Hashmall, Joseph	11/10/2022	\$770.00	0.3	231	Email to MeridianLink counsel regarding production schedule
Hashmall, Joseph	11/10/2022	\$770.00	0.2	154	Internal email regarding [REDACTED]
Hashmall, Joseph	11/10/2022	\$770.00	0.2	154	Email and voicemail to client Hinkel regarding [REDACTED]
Hashmall, Joseph	11/10/2022	\$770.00	0.4	308	Call with client Noon regarding [REDACTED]

Hibray, Jean	11/10/2022	\$450.00	0.1	45	Emails re [REDACTED]
Hibray, Jean	11/10/2022	\$450.00	0.3	135	Finalize and e-serve T Noon responses
Hashmall, Joseph	11/11/2022	\$770.00	0.3	231	Call with client Hinkel regarding [REDACTED]
Hashmall, Joseph	11/11/2022	\$770.00	0.3	231	Review of Defendant's edits to draft letter requesting extension, email to opposing counsel regarding same
Hashmall, Joseph	11/11/2022	\$770.00	0.2	154	Email to opposing counsel regarding settlement offers
Hashmall, Joseph	11/11/2022	\$770.00	0.3	231	Review of draft response to Ms. Hinkel subpoena, internal email regarding same
Hibray, Jean	11/11/2022	\$450.00	0.2	90	Finalize, submit extension letter
Hibray, Jean	11/11/2022	\$450.00	0.1	45	Prepare E Hinkel responses and objections
Hibray, Jean	11/11/2022	\$450.00	0.2	90	Finalize and eserve E Hinkel responses
Hashmall, Joseph	11/14/2022	\$770.00	0.3	231	Email exchange with MeridianLink counsel regarding data production
Gionnette, Julie	11/14/2022	\$285.00	0.1	28.5	download and review docket entries
Gionnette, Julie	11/15/2022	\$285.00	0.3	85.5	update calendar deadlines per amended scheduling order
Hibray, Jean	11/16/2022	\$450.00	0.2	90	QC dockets, add missing date
Hashmall, Joseph	11/17/2022	\$770.00	0.6	462	Review of discovery documents in case, email to opposing counsel regarding same
Hibray, Jean	11/17/2022	\$450.00	0.1	45	Email with J Hashmall re doc planning
Hibray, Jean	11/18/2022	\$450.00	0.8	360	Export work of Def productions to date, prepare Intake form, submit to Ricoh
Hashmall, Joseph	11/21/2022	\$770.00	0.2	154	Review of and edits to draft [REDACTED] client
Hashmall, Joseph	11/21/2022	\$770.00	0.4	308	Email exchange with MeridianLink counsel regarding ESI production in case
Hashmall, Joseph	11/21/2022	\$770.00	0.6	462	Internal emails regarding [REDACTED]
Hibray, Jean	11/21/2022	\$450.00	0.2	90	Draft [REDACTED], finalize and send
Drake, Eleanor Michelle	11/21/2022	\$1,180.00	0.3	354	review data from Meridian Link, email with J Hashmall re same
Hashmall, Joseph	11/22/2022	\$770.00	0.3	231	Internal emails and email to opposing counsel setting up call on case status
Hashmall, Joseph	11/22/2022	\$770.00	1.7	1309	Review of documents produced thus far by Defendant in case
Hashmall, Joseph	11/23/2022	\$770.00	0.3	231	Call with opposing counsel regarding next steps in case
Hashmall, Joseph	11/23/2022	\$770.00	0.5	385	Call with Michelle Drake regarding next steps in case
Hashmall, Joseph	11/23/2022	\$770.00	0.5	385	Email exchanges with clients regarding [REDACTED]
Drake, Eleanor Michelle	11/23/2022	\$1,180.00	0.5	590	call with J Hashmall re data produced by Meridian Link and next steps in litigation
Drake, Eleanor Michelle	11/23/2022	\$1,180.00	0.5	590	call with oc re Meridan Link discovery reponse and next steps in litigation
Hashmall, Joseph	11/28/2022	\$770.00	0.4	308	Email to opposing counsel regarding next steps in MeridianLink discovery
Hibray, Jean	11/28/2022	\$450.00	0.2	90	Review email re postponed depos, docket accordingly
Hashmall, Joseph	11/29/2022	\$770.00	0.2	154	Review of email from opposing counsel to MeridianLink counsel regarding data discovery
Hashmall, Joseph	12/1/2022	\$770.00	0.2	154	Email to opposing counsel regarding MeridianLink discovery
Hashmall, Joseph	12/6/2022	\$770.00	0.2	154	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	12/7/2022	\$770.00	0.2	154	Review of email from opposing counsel regarding data discovery, internal emails regarding response to same
Hashmall, Joseph	12/8/2022	\$770.00	0.3	231	Emails to opposing counsel and MeridianLink counsel regarding data discovery in case
Hashmall, Joseph	12/12/2022	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	12/12/2022	\$1,180.00	0.2	236	team meeting to discuss upcoming deadlines and approach
Hashmall, Joseph	12/15/2022	\$770.00	0.5	385	Email exchange with counsel for MeridianLink regarding data discovery
Hashmall, Joseph	12/15/2022	\$770.00	0.3	231	Downloading Defendant's production, internal email regarding processing of same
Hibray, Jean	12/15/2022	\$450.00	0.2	90	Review new def prod, submit to Ricoh
Hashmall, Joseph	12/19/2022	\$770.00	0.2	154	Email to opposing counsel regarding data discovery
Hashmall, Joseph	12/20/2022	\$770.00	0.2	154	Email to opposing counsel regarding MeridianLink data
Hashmall, Joseph	12/21/2022	\$770.00	0.5	385	Email exchange with opposing counsel regarding MeridianLink data
Hashmall, Joseph	12/21/2022	\$770.00	0.1	77	Review of email from MeridianLink counsel regarding data discovery
Hashmall, Joseph	12/28/2022	\$770.00	0.4	308	Email exchange with opposing counsel regarding MeridianLink data
Hashmall, Joseph	12/29/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding MeridianLink discovery
Hashmall, Joseph	12/30/2022	\$770.00	0.3	231	Email exchange with opposing counsel regarding MeridianLink data
Hashmall, Joseph	1/3/2023	\$770.00	0.3	231	Call with Michelle Drake regarding next steps in case
Drake, Eleanor Michelle	1/3/2023	\$1,180.00	0.3	354	call with J. Hashmall re status of discovery, upcoming deadlines, and next steps in litigation
Hashmall, Joseph	1/4/2023	\$770.00	0.4	308	Email to opposing counsel regarding data production, discovery extension
Hashmall, Joseph	1/5/2023	\$770.00	0.3	231	Email to opposing counsel regarding data production
Drake, Eleanor Michelle	1/6/2023	\$1,180.00	0.1	118	team meeting to review upcoming deadlines and next steps in litigation
Hashmall, Joseph	1/9/2023	\$770.00	0.4	308	Email and voicemail to opposing counsel regarding data production and request for extension
Hibray, Jean	1/9/2023	\$450.00	0.2	90	Prepare letter re extension request
Hashmall, Joseph	1/10/2023	\$770.00	0.3	231	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	1/10/2023	\$770.00	0.4	308	Review of draft letter to court requesting extension, internal email regarding edits to same
Hibray, Jean	1/10/2023	\$450.00	0.2	90	Edit letter request for extension

Hashmall, Joseph	1/11/2023	\$770.00	0.3	231	Call with opposing counsel regarding case schedule, depositions
Hashmall, Joseph	1/11/2023	\$770.00	0.8	616	Edits to draft letter seeking extension, email to opposing counsel attaching same, internal emails regarding same
Drake, Eleanor Michelle	1/11/2023	\$1,180.00	0.5	590	review redline and comment on joint letter requesting extension due to MeridianLink failed production
Hashmall, Joseph	1/12/2023	\$770.00	0.5	385	Edits to draft letter seeking extension, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	1/12/2023	\$770.00	0.9	693	Drafting joint letter to MeridianLink regarding data production, internal emails and email to opposing counsel regarding same
Hashmall, Joseph	1/13/2023	\$770.00	0.9	693	Email exchange with opposing counsel regarding draft letters to court and to MeridianLink, review of edits to letters, further edits to same, internal emails regarding sending of same
Hibray, Jean	1/13/2023	\$450.00	0.3	135	Proof, finalize and send to Court via fax, letter requesting extension
Hibray, Jean	1/13/2023	\$450.00	0.2	90	Proof, finalize and eserve letter to MeridianLink.
Hashmall, Joseph	1/17/2023	\$770.00	0.2	154	Internal emails regarding next steps in MeridianLink discovery
Gionnette, Julie	1/17/2023	\$285.00	0.3	85.5	download and review letter to chambers and amended scheduling order; update calendar deadlines
Hibray, Jean	1/17/2023	\$450.00	0.2	90	Draft subpoenas for MeridianLink
Hashmall, Joseph	1/18/2023	\$770.00	0.2	154	Email to opposing counsel regarding deposition scheduling
Hashmall, Joseph	1/23/2023	\$770.00	2	1540	Email to opposing counsel regarding depositions
Hashmall, Joseph	1/23/2023	\$770.00	0.5	385	Review of email from MeridianLink counsel, drafting response to same, internal email regarding same
Hashmall, Joseph	1/24/2023	\$770.00	0.3	231	Emails with opposing counsel and MeridianLink counsel regarding meet and confer call
Hashmall, Joseph	1/24/2023	\$770.00	0.1	77	Email to opposing counsel regarding deposition schedule
Gionnette, Julie	1/25/2023	\$285.00	0.1	28.5	download and review order; update calendar
Hashmall, Joseph	1/26/2023	\$770.00	0.3	231	Emails setting up call with MeridianLink counsel
Hashmall, Joseph	1/26/2023	\$770.00	0.2	154	Email to opposing counsel regarding deposition scheduling
Hashmall, Joseph	1/27/2023	\$770.00	0.3	231	Emails with opposing counsel regarding deposition scheduling
Hashmall, Joseph	1/27/2023	\$770.00	0.2	154	Internal emails regarding updated interrogatory responses
Hibray, Jean	1/27/2023	\$450.00	0.2	90	Email with J Hashmall re NODS, discovery responses.
Hibray, Jean	1/27/2023	\$450.00	0.3	135	Prepare 2d Am 30b6 NOD, finalize and eserve, send to Lexitas.
Hashmall, Joseph	1/30/2023	\$770.00	0.3	231	Call with opposing counsel and MeridianLink counsel regarding data production, internal email regarding same
Hashmall, Joseph	1/30/2023	\$770.00	0.3	231	Email to opposing counsel and MeridianLink counsel regarding data production
Hashmall, Joseph	2/1/2023	\$770.00	0.2	154	Email to opposing counsel regarding data production
Hashmall, Joseph	2/1/2023	\$770.00	0.7	539	Downloading [REDACTED] internal email, email to expert and email to opposing counsel regarding same
Hashmall, Joseph	2/1/2023	\$770.00	0.3	231	Emails to opposing counsel and MeridianLink counsel regarding [REDACTED] data
Hashmall, Joseph	2/2/2023	\$770.00	0.2	154	Internal email regarding [REDACTED]
Hashmall, Joseph	2/2/2023	\$770.00	0.3	231	Email exchange with opposing counsel regarding data review
Hibray, Jean	2/2/2023	\$450.00	0.3	135	Prepare and send [REDACTED] data transfer
Hashmall, Joseph	2/3/2023	\$770.00	0.1	77	Internal email regarding revised discovery responses
Hashmall, Joseph	2/6/2023	\$770.00	0.3	231	Email exchange with MeridianLink counsel regarding data production
Hashmall, Joseph	2/7/2023	\$770.00	0.3	231	Research and internal email regarding new judicial assignment
Hashmall, Joseph	2/7/2023	\$770.00	0.2	154	Email exchange with MeridianLink regarding data production
Gionnette, Julie	2/7/2023	\$285.00	0.1	28.5	download and review docket entry
Hashmall, Joseph	2/13/2023	\$770.00	0.2	154	Email to meridianlink counsel regarding production status
Hashmall, Joseph	2/15/2023	\$770.00	0.3	231	Call with expert regarding [REDACTED]
Hashmall, Joseph	2/15/2023	\$770.00	0.2	154	Review of email from MeridianLink regarding data production
Hashmall, Joseph	2/16/2023	\$770.00	0.2	154	Email to counsel for MeridianLink regarding data production
Hibray, Jean	2/21/2023	\$450.00	0.3	135	Review new MeridianLink data [REDACTED]
Hashmall, Joseph	2/21/2023	\$770.00	0.2	154	Email to MeridianLink counsel regarding data production
Hashmall, Joseph	2/21/2023	\$770.00	0.2	154	Internal email regarding processing data production
Hibray, Jean	2/22/2023	\$450.00	0.2	90	Review new def prod, submit to Ricoh
Hashmall, Joseph	2/22/2023	\$770.00	0.4	308	Call with expert regarding [REDACTED]
Hashmall, Joseph	2/22/2023	\$770.00	0.2	154	Internal email regarding Defendant's document production
Hashmall, Joseph	2/22/2023	\$770.00	0.2	154	Email to MeridianLink counsel regarding data production
Hashmall, Joseph	2/22/2023	\$770.00	0.3	231	Internal email regarding Plaintiff's depositions, email to opposing counsel regarding same
Hibray, Jean	2/23/2023	\$450.00	0.2	90	Emails to clients and their spouses re [REDACTED]
Hibray, Jean	2/23/2023	\$450.00	0.1	45	Set up AgileLaw
Hashmall, Joseph	2/23/2023	\$770.00	1.2	924	Review of documents for use in 30b6, internal emails regarding same
Hibray, Jean	2/24/2023	\$450.00	0.5	225	Redline Noon responses, email with J Hashmall re same; finalize and send [REDACTED]
Hibray, Jean	2/24/2023	\$450.00	0.2	90	Follow up emails with clients re [REDACTED]
Hashmall, Joseph	2/24/2023	\$770.00	0.4	308	Review of draft revised discovery response, internal email regarding deposition scheduling
Hashmall, Joseph	2/27/2023	\$770.00	1	770	Pulling exhibits for 30b6, internal emails regarding same

Hibray, Jean	2/27/2023	\$450.00	0.1	45	Email J Hashmall re [REDACTED]
Hibray, Jean	2/27/2023	\$450.00	0.2	90	Prepare service copy of supplemental answers, e-serve same
Hibray, Jean	2/27/2023	\$450.00	0.3	135	Export 30b6 search from Rel, load to AgileLaw, email J Hashmall
Hashmall, Joseph	2/28/2023	\$770.00	0.6	462	Review of emails with clients regarding [REDACTED], internal email regarding same, emails to opposing counsel regarding same
Hashmall, Joseph	2/28/2023	\$770.00	0.3	231	Call and email with client Noon regarding [REDACTED]
Hashmall, Joseph	2/28/2023	\$770.00	0.2	154	Email to opposing counsel regarding deposition scheudle
Hashmall, Joseph	2/28/2023	\$770.00	1.5	1155	Organizing exhibits and outlining for 30b6 deposition
Gionnette, Julie	2/28/2023	\$285.00	0.2	57	download and review order; calendar deadlines
Hashmall, Joseph	3/1/2023	\$770.00	0.3	231	Emails to opposing counsel and court reporter regarding change in time
Hashmall, Joseph	3/1/2023	\$770.00	4	3080	Preparing for 30b6 of Defendant
Hibray, Jean	3/1/2023	\$450.00	0.1	45	Emails re confirming depo
Hashmall, Joseph	3/2/2023	\$770.00	4.3	3311	Conduct 30b6 deposition of Defendant
Hashmall, Joseph	3/2/2023	\$770.00	1	770	Prep for 30b6 deposition of Defendant
Hibray, Jean	3/2/2023	\$450.00	0.3	135	Monitor depo connections
Hibray, Jean	3/2/2023	\$450.00	0.2	90	Email clients re [REDACTED] docket re same
Hashmall, Joseph	3/6/2023	\$770.00	0.3	231	Internal email regarding Defendant's additional production
Hibray, Jean	3/6/2023	\$450.00	0.2	90	Review new def prod, submit to Ricoh
Hashmall, Joseph	3/7/2023	\$770.00	0.3	231	Email exchange with opposing counsel regarding deposition notices and deposition scheduling, internal email regarding same
Hashmall, Joseph	3/7/2023	\$770.00	0.2	154	Internal email and email to opposing counsel regarding deposition scheduling
Hibray, Jean	3/7/2023	\$450.00	0.2	90	Emails re Noon depo
Hibray, Jean	3/7/2023	\$450.00	0.3	135	Review depo notices from opposing, docket accordingly
Hashmall, Joseph	3/9/2023	\$770.00	0.2	154	Email to opposing counsel regarding deposition scheduling
Gionnette, Julie	3/10/2023	\$285.00	0.1	28.5	download M. Brown depo transcript and exhibits and save to iManage
Hashmall, Joseph	3/13/2023	\$770.00	0.2	154	Email to client Hinkel regarding [REDACTED]
Hashmall, Joseph	3/14/2023	\$770.00	0.2	154	Email to client Hinkel regarding [REDACTED]
Hashmall, Joseph	3/14/2023	\$770.00	0.3	231	Email exchange with expert [REDACTED]
Hibray, Jean	3/14/2023	\$450.00	0.1	45	Docket transcript review
Hashmall, Joseph	3/15/2023	\$770.00	1.2	924	Call and emails with Ms. Hinkel regarding [REDACTED], review of documents in advance of call
Hashmall, Joseph	3/16/2023	\$770.00	0.2	154	Internal email regarding logistics for Noon deposition
Hashmall, Joseph	3/20/2023	\$770.00	1.1	847	Review of draft notice regarding ADR, internal emails regarding same, call with opposing counsel regarding same
Hashmall, Joseph	3/21/2023	\$770.00	0.1	77	Email with Michelle Drake regarding next steps in case
Gionnette, Julie	3/21/2023	\$285.00	0.1	28.5	download and review docket entry
Hashmall, Joseph	3/22/2023	\$770.00	0.4	308	Email exchange with Emma Hinkel [REDACTED]
Hashmall, Joseph	3/22/2023	\$770.00	0.3	231	Email exchange with Jason Hinkel regarding [REDACTED]
Hashmall, Joseph	3/23/2023	\$770.00	5	3850	Defend deposition of Ms. Hinkel, including tech time and client prep time
Hashmall, Joseph	3/24/2023	\$770.00	0.3	231	Email exchange with expert [REDACTED]
Hashmall, Joseph	3/27/2023	\$770.00	1	770	Deposition preparation call with client, emails with client regarding [REDACTED]
Hashmall, Joseph	3/27/2023	\$770.00	0.8	616	Review [REDACTED] data, emails regarding same
Hashmall, Joseph	3/27/2023	\$770.00	0.6	462	Emails and call with opposing counsel regarding deposition rescheduling, emails to client regarding [REDACTED]
Hashmall, Joseph	3/27/2023	\$770.00	0.6	462	Call with expert regarding [REDACTED]
Hashmall, Joseph	3/28/2023	\$770.00	0.6	462	Emails to opposing counsel and client regarding logistics of upcoming Hinkel deposition
Hashmall, Joseph	3/28/2023	\$770.00	0.2	154	Email to client Noon regarding [REDACTED]
Hashmall, Joseph	3/28/2023	\$770.00	0.3	231	Email to opposing conusel regarding data review and sample
Hashmall, Joseph	3/28/2023	\$770.00	2.4	1848	Review of [REDACTED] data, email exchange with expert regarding [REDACTED]
Hashmall, Joseph	3/28/2023	\$770.00	1.1	847	Review of [REDACTED] emails with expert regarding [REDACTED]
Hashmall, Joseph	3/29/2023	\$770.00	7.5	5775	Defend Plaintiff Hinkel's deposition
Hashmall, Joseph	3/29/2023	\$770.00	0.3	231	Review of subpoenas served by opposing counsel
Hibray, Jean	3/29/2023	\$450.00	0.1	45	Email with J Hashmall re [REDACTED]
Hashmall, Joseph	3/30/2023	\$770.00	0.6	462	Review of [REDACTED] class
Hashmall, Joseph	3/30/2023	\$770.00	1.2	924	Review of [REDACTED] class, call and emails with expert regarding [REDACTED]
Hashmall, Joseph	3/30/2023	\$770.00	1.3	1001	Emails and calls with Michelle Drake regarding previous depositions, next steps in case, and potential settlement
Hashmall, Joseph	3/30/2023	\$770.00	0.2	154	Email to client Noon regarding [REDACTED]
Hashmall, Joseph	3/30/2023	\$770.00	0.3	231	Emails with opposing counsel regarding logistics of South Shore Mortgage deposition
Drake, Eleanor Michelle	3/30/2023	\$1,180.00	2.7	3186	review [REDACTED] and read [REDACTED] transcript.
Drake, Eleanor Michelle	3/30/2023	\$1,180.00	0.5	590	call with J Hashmall re demand and status of case

Hashmall, Joseph	3/31/2023	\$770.00	1.2	924	Review of [REDACTED] email and call with expert regarding [REDACTED]
Hashmall, Joseph	3/31/2023	\$770.00	0.2	154	Email to opposing counsel regarding data request
Hashmall, Joseph	3/31/2023	\$770.00	2.5	1925	Researching and reaching out to [REDACTED]
Hashmall, Joseph	3/31/2023	\$770.00	0.2	154	Voicemail to client Noon regarding [REDACTED]
Hashmall, Joseph	3/31/2023	\$770.00	0.8	616	Emails with Michelle Drake regarding next steps in case
Hashmall, Joseph	3/31/2023	\$770.00	0.2	154	Email to opposing counsel regarding South Shore deposition
Drake, Eleanor Michelle	3/31/2023	\$1,180.00	0.7	826	research [REDACTED], email JCH re same
Drake, Eleanor Michelle	3/31/2023	\$1,180.00	1.5	1770	draft memo for J Hashmall re [REDACTED]
Hibray, Jean	4/3/2023	\$450.00	0.5	225	Draft subpoena, exhibits for South Shore
Hibray, Jean	4/3/2023	\$450.00	0.3	135	Finalize and e-serve Subpoena on opposing, send to Pro Legal
Hibray, Jean	4/3/2023	\$450.00	0.1	45	Client outreach
Hashmall, Joseph	4/3/2023	\$770.00	0.3	231	Litigation team meeting
Hashmall, Joseph	4/3/2023	\$770.00	0.2	154	Reaching out to client Noon regarding [REDACTED]
Hashmall, Joseph	4/3/2023	\$770.00	0.3	231	Emails with [REDACTED]
Hashmall, Joseph	4/3/2023	\$770.00	0.3	231	Emails with [REDACTED]
Hashmall, Joseph	4/3/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding additional production
Hashmall, Joseph	4/3/2023	\$770.00	0.4	308	Internal emails regarding additional discovery in case
Hashmall, Joseph	4/3/2023	\$770.00	0.3	231	Internal email regarding upcoming status conference, email to court regarding same
Hashmall, Joseph	4/3/2023	\$770.00	0.5	385	Review of draft south shore mortgage discovery, internal emails regarding same
Hibray, Jean	4/4/2023	\$450.00	0.4	180	Client outreach [REDACTED]
Hashmall, Joseph	4/4/2023	\$770.00	0.7	539	Interview with [REDACTED]
Hashmall, Joseph	4/4/2023	\$770.00	0.6	462	Interview with [REDACTED]
Hashmall, Joseph	4/4/2023	\$770.00	0.8	616	Call and emails with client Noon regarding [REDACTED]
Hashmall, Joseph	4/4/2023	\$770.00	0.4	308	Internal emails regarding upcoming depositions, call with Michelle Drake regarding same
Hashmall, Joseph	4/4/2023	\$770.00	0.2	154	Call with opposing counsel regarding deposition scheduling
Drake, Eleanor Michelle	4/4/2023	\$1,180.00	0.5	590	meet with [REDACTED]
Drake, Eleanor Michelle	4/4/2023	\$1,180.00	0.5	590	meet with [REDACTED]
Drake, Eleanor Michelle	4/4/2023	\$1,180.00	1	1180	emails with J hashmall re [REDACTED]
Drake, Eleanor Michelle	4/4/2023	\$1,180.00	0.8	944	emails with J Hashmall re named plaintiffs
Hibray, Jean	4/5/2023	\$450.00	0.3	135	Review emails re document prods, respond on record
Hibray, Jean	4/5/2023	\$450.00	0.3	135	Finalize and file pro hac
Hashmall, Joseph	4/5/2023	\$770.00	0.6	462	Emails with opposing counsel and client Noon regarding deposition schedule
Hashmall, Joseph	4/5/2023	\$770.00	0.4	308	Email to opposing counsel regarding South Shore Mortgage discovery, email to South Shore counsel regarding same
Hashmall, Joseph	4/5/2023	\$770.00	1.5	1155	Call and video call with Tim Noon regarding [REDACTED]
Hashmall, Joseph	4/5/2023	\$770.00	0.4	308	Email exchange with client Hinkel regarding [REDACTED]
Hashmall, Joseph	4/5/2023	\$770.00	0.5	385	Email exchange with opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	4/5/2023	\$770.00	0.5	385	Email exchange with client Noon regarding [REDACTED]
Gionnette, Julie	4/5/2023	\$285.00	0.2	57	download and review docket entries; calendar status conf.
Hibray, Jean	4/6/2023	\$450.00	0.9	405	Review [REDACTED], PDF each, [REDACTED] prep for production, email with J Hashmall re same
Hibray, Jean	4/6/2023	\$450.00	0.3	135	Finalize and e-serve Hinkel Vol 002
Hibray, Jean	4/6/2023	\$450.00	0.2	90	Docket E Hinkel transcript files
Hibray, Jean	4/6/2023	\$450.00	0.2	90	Export South Shore, [REDACTED]
Hibray, Jean	4/6/2023	\$450.00	0.3	135	Draft joint ltr request for extension, check new judge procedures
Hibray, Jean	4/6/2023	\$450.00	0.2	90	Email E Hinkel re [REDACTED]
Hashmall, Joseph	4/6/2023	\$770.00	0.6	462	Call with Tim Noon regarding [REDACTED]
Hashmall, Joseph	4/6/2023	\$770.00	0.3	231	Review [REDACTED], internal email regarding same
Hashmall, Joseph	4/6/2023	\$770.00	1	770	Review [REDACTED] Hinkel, internal emails regarding production of same
Hashmall, Joseph	4/6/2023	\$770.00	0.3	231	Emails to Narily and Tim Noon regarding [REDACTED]
Hashmall, Joseph	4/6/2023	\$770.00	0.5	385	Internal emails and email to opposing counsel regarding joint request for extension
Hashmall, Joseph	4/6/2023	\$770.00	0.2	154	Internal email regarding Ms. Hinkel deposition errata.
Hashmall, Joseph	4/6/2023	\$770.00	0.3	231	Calls and emails with the Noons regarding [REDACTED]
Hashmall, Joseph	4/6/2023	\$770.00	0.5	385	Pre-production review of additional Hinkel documents
Hibray, Jean	4/7/2023	\$450.00	0.2	90	Finalize and submit ltr to judge
Hibray, Jean	4/7/2023	\$450.00	0.1	45	Review request for new prod, respond with follow up questions
Hibray, Jean	4/7/2023	\$450.00	0.3	135	PDF emails from individual case for attorney review
Hashmall, Joseph	4/7/2023	\$770.00	0.6	462	Call with Michelle Drake regarding next steps in case
Hashmall, Joseph	4/7/2023	\$770.00	0.4	308	Emails to opposing counsel and internal emails regarding request to extend deadlines

Hashmall, Joseph	4/7/2023	\$770.00	0.6	462	Call and email with counsel for South Shore Mortgage regarding discovery, email with opposing counsel regarding same
Hashmall, Joseph	4/7/2023	\$770.00	0.8	616	Internal emails regarding additional production, pre-production review of same
Hashmall, Joseph	4/10/2023	\$770.00	0.6	462	Call and emails with Tim Noon regarding [REDACTED]
Hashmall, Joseph	4/10/2023	\$770.00	0.6	462	Review of documents prior to production, internal email regarding same
Hashmall, Joseph	4/10/2023	\$770.00	0.2	154	Emails regarding South Shore testimony
Hibray, Jean	4/10/2023	\$450.00	0.2	90	Email with E Hinkel, send [REDACTED]
Hibray, Jean	4/10/2023	\$450.00	0.1	45	Review J Hashmall confirmation of today's docs to produce, respond on same
Hibray, Jean	4/10/2023	\$450.00	0.5	225	Prepare production of [REDACTED], e-serve on opposing
Hashmall, Joseph	4/11/2023	\$770.00	5	3850	Defending deposition of Tiim Noon
Hashmall, Joseph	4/11/2023	\$770.00	0.3	231	Email to client Hinkel regarding [REDACTED]
Hashmall, Joseph	4/11/2023	\$770.00	0.2	154	Email to opposing counsel regarding additional document production
Hibray, Jean	4/11/2023	\$450.00	0.1	45	Draft and send email to client re [REDACTED]
Hashmall, Joseph	4/12/2023	\$770.00	0.5	385	Emails with Tim Noon regarding [REDACTED]
Hashmall, Joseph	4/12/2023	\$770.00	0.3	231	Internal email following up on Tim Noon deposition
Hashmall, Joseph	4/12/2023	\$770.00	0.2	154	Email exchange with Client Noon regarding [REDACTED]
Hashmall, Joseph	4/12/2023	\$770.00	0.2	154	Internal email regarding Hinkel deposition transcript and errata
Hashmall, Joseph	4/12/2023	\$770.00	0.5	385	Internal emails, emails with opposing counsel and emails with South Shore counsel regarding upcoming South Shore deposition
Hibray, Jean	4/12/2023	\$450.00	0.2	90	Review files, email agreement copy to J Hashmall
Hibray, Jean	4/12/2023	\$450.00	0.3	135	Deposition logistic discussions and emails with J Hashmall, reporter
Hibray, Jean	4/12/2023	\$450.00	0.3	135	Docket client transcript files, email re: review same
Hashmall, Joseph	4/13/2023	\$770.00	0.4	308	Review of South Shore Mortgage production, email to South Shore counsel regarding same
Hashmall, Joseph	4/13/2023	\$770.00	0.2	154	Email to opposing counsel regarding additional production
Hashmall, Joseph	4/13/2023	\$770.00	0.3	231	Email and voicemail for client Noon
Hashmall, Joseph	4/14/2023	\$770.00	0.2	154	Email to client Noon regarding [REDACTED]
Hibray, Jean	4/14/2023	\$450.00	0.1	45	Email with J Hashmall re South Shore
Hibray, Jean	4/14/2023	\$450.00	0.3	135	Review new def prod, emails with J Hashmall re same
Hibray, Jean	4/14/2023	\$450.00	0.1	45	Email opposing re upload status
Hashmall, Joseph	4/17/2023	\$770.00	0.4	308	Voicemail for and call with opposing counsel regarding upcoming discovery
Hashmall, Joseph	4/17/2023	\$770.00	0.6	462	Call with client Noon regarding [REDACTED]
Hashmall, Joseph	4/17/2023	\$770.00	0.5	385	Emails with South Shore Mortgage counsel and opposing counsel regarding upcoming depositions
Hashmall, Joseph	4/17/2023	\$770.00	0.6	462	Review of South Shore discovery responses and production
Hashmall, Joseph	4/17/2023	\$770.00	0.5	385	Emails with expert regarding [REDACTED]
Hibray, Jean	4/17/2023	\$450.00	0.2	90	Transfers of sample reports, emails re same
Hashmall, Joseph	4/18/2023	\$770.00	0.7	539	Video chat with client Noon regarding [REDACTED]
Hashmall, Joseph	4/18/2023	\$770.00	0.2	154	Email to referring counsel regarding discovery documents
Hashmall, Joseph	4/18/2023	\$770.00	0.3	231	Emails to client Noon regarding [REDACTED]
Hashmall, Joseph	4/19/2023	\$770.00	4.5	3465	Attend and conduct deposition of South Shore Mortgage
Hashmall, Joseph	4/19/2023	\$770.00	0.2	154	Email to referring counsel regarding discovery documents
Hashmall, Joseph	4/19/2023	\$770.00	1	770	Pulling exhibits and outlining for South Shore Mortgage deposition
Hibray, Jean	4/19/2023	\$450.00	0.2	90	Emails re South Shore depo
Hibray, Jean	4/19/2023	\$450.00	0.2	90	Docket copies of docs from referring counsel
Hashmall, Joseph	4/20/2023	\$770.00	0.6	462	Review of documents provided by referring counsel for potential production
Hashmall, Joseph	4/20/2023	\$770.00	0.3	231	Email to Michelle Drake summarizing yesterday's deposition
Hashmall, Joseph	4/20/2023	\$770.00	0.4	308	Email exchange with client Noon regarding [REDACTED]
Hashmall, Joseph	4/21/2023	\$770.00	6	4620	Defend client Noon's deposition
Hashmall, Joseph	4/24/2023	\$770.00	0.2	154	Email to opposing counsel regarding production status
Hashmall, Joseph	4/24/2023	\$770.00	0.3	231	Email to expert regarding [REDACTED]
Hashmall, Joseph	4/24/2023	\$770.00	0.2	154	Email with Court reporter regarding exhibits from client Noon's deposition
Hashmall, Joseph	4/24/2023	\$770.00	0.3	231	Email to Michelle Drake summarizing Noon deposition
Hibray, Jean	4/24/2023	\$450.00	0.2	90	Email [REDACTED] expert
Hibray, Jean	4/24/2023	\$450.00	0.2	90	Review def prods, [REDACTED] review
Hashmall, Joseph	4/25/2023	\$770.00	0.3	231	Call with Michelle Drake regarding next steps in case, internal email regarding same
Hibray, Jean	4/25/2023	\$450.00	0.1	45	Email client re [REDACTED]
Hibray, Jean	4/25/2023	\$450.00	0.2	90	Pull [REDACTED] for J Hashmall
Drake, Eleanor Michelle	4/25/2023	\$1,180.00	0.5	590	call with J Hashmall re next steos

Hashmall, Joseph	4/26/2023	\$770.00	0.3	231	Internal emails regarding client depo errata sheets
Hibray, Jean	4/26/2023	\$450.00	0.2	90	Docket T Noon transcript files, email re review same
Hashmall, Joseph	4/27/2023	\$770.00	0.2	154	Internal emails regarding transcript invoices
Hashmall, Joseph	4/27/2023	\$770.00	0.2	154	Email exchange with expert regarding [REDACTED]
Hibray, Jean	4/27/2023	\$450.00	0.3	135	Email with client re [REDACTED]
Hashmall, Joseph	4/28/2023	\$770.00	0.7	539	Drafting demand letter
Hashmall, Joseph	4/28/2023	\$770.00	0.7	539	Review of Hinkel transcripts for confidential designations, internal email regarding same
Hibray, Jean	4/28/2023	\$450.00	0.2	90	Email reporter with signature pages
Hashmall, Joseph	5/1/2023	\$770.00	0.8	616	Emails with expert, Meridian Link counsel and opposing counsel regarding data production
Hashmall, Joseph	5/1/2023	\$770.00	0.4	308	Emails with expert regarding [REDACTED]
Hibray, Jean	5/1/2023	\$450.00	0.1	45	Email [REDACTED] expert
Hibray, Jean	5/1/2023	\$450.00	0.2	90	Email re [REDACTED]
Hashmall, Joseph	5/3/2023	\$770.00	1	770	Review of [REDACTED], emails with expert regarding [REDACTED]
Gionnette, Julie	5/3/2023	\$285.00	0.1	28.5	download and review order; updated calendar deadline
Hibray, Jean	5/3/2023	\$450.00	0.1	45	Email N Noon re [REDACTED]
Hibray, Jean	5/3/2023	\$450.00	0.2	90	Docket N Noon transcript files
Hibray, Jean	5/3/2023	\$450.00	0.1	45	Review order on extension, email attorney re same
Hashmall, Joseph	5/4/2023	\$770.00	0.4	308	Call with expert regarding [REDACTED]
Hashmall, Joseph	5/4/2023	\$770.00	0.8	616	Review of and comments on [REDACTED]
Hashmall, Joseph	5/4/2023	\$770.00	0.3	231	Review of and edits to draft motion to strike
Hashmall, Joseph	5/4/2023	\$770.00	0.8	616	Emails to expert regarding [REDACTED]
Hashmall, Joseph	5/4/2023	\$770.00	0.5	385	Attend court status conference
Hashmall, Joseph	5/4/2023	\$770.00	0.4	308	Review of draft letter to chambers regarding extended deadlines, email to opposing counsel regarding same
Hibray, Jean	5/4/2023	\$450.00	0.1	45	Email client re [REDACTED]
Hibray, Jean	5/4/2023	\$450.00	0.3	135	Update calendar following court conference
Hibray, Jean	5/4/2023	\$450.00	0.1	45	Email table of dates to attorney
Hibray, Jean	5/4/2023	\$450.00	0.2	90	Draft joint letter to court re calendar
Drake, Eleanor Michelle	5/4/2023	\$1,180.00	0.3	354	review and approve letter to chambers re schedule
Hashmall, Joseph	5/5/2023	\$770.00	0.6	462	Review of Defendant's edits to draft letter to chambers, further edits to same, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	5/5/2023	\$770.00	0.4	308	Email exchange with Michelle Drake regarding [REDACTED]
Gionnette, Julie	5/5/2023	\$285.00	0.1	28.5	download and review docket entry
Hibray, Jean	5/5/2023	\$450.00	0.1	45	Run redline of joint letter, email with J Hashmall re same
Hibray, Jean	5/5/2023	\$450.00	0.3	135	Edit, finalize and submit joint letter to court
Drake, Eleanor Michelle	5/5/2023	\$1,180.00	1.7	2006	review redline and comment on [REDACTED]; memo to Jhashmall re same
Hashmall, Joseph	5/9/2023	\$770.00	0.4	308	Emails with MeridianLink counsel regarding additional data
Gionnette, Julie	5/9/2023	\$285.00	0.6	171	download and review amended scheduling order; update calendar deadlines
Hibray, Jean	5/10/2023	\$450.00	0.2	90	Review amended schedule, docket accordingly
Hibray, Jean	5/10/2023	\$450.00	0.2	90	Docket South Shore Mortg transcript files
Hibray, Jean	5/10/2023	\$450.00	0.1	45	Follow up email re transcript
Hashmall, Joseph	5/11/2023	\$770.00	0.7	539	Email exchange with MeridianLink regarding additional data production, internal emails regarding same
Hibray, Jean	5/11/2023	\$450.00	0.1	45	Docket new third party data
Hashmall, Joseph	5/12/2023	\$770.00	0.4	308	Emails with expert regarding [REDACTED]
Hibray, Jean	5/12/2023	\$450.00	0.2	90	Data transfer emails
Hashmall, Joseph	5/16/2023	\$770.00	0.2	154	Litigation team meeting
Hashmall, Joseph	5/16/2023	\$770.00	0.3	231	Email exchange with expert regarding about [REDACTED]
Drake, Eleanor Michelle	5/16/2023	\$1,180.00	0.1	118	team meeting re schedule and next steps
Hashmall, Joseph	5/17/2023	\$770.00	0.9	693	Review of [REDACTED], internal emails and emails to expert regarding [REDACTED]
Hashmall, Joseph	5/17/2023	\$770.00	0.5	385	Emails with expert and MeridianLink counsel regarding missing data
Hibray, Jean	5/17/2023	\$450.00	0.1	45	Docket South Shore files
Hashmall, Joseph	5/18/2023	\$770.00	0.8	616	Review of [REDACTED], email to expert and internal email regarding same
Drake, Eleanor Michelle	5/18/2023	\$1,180.00	1.3	1534	review redline and revise [REDACTED] report, raise questions about [REDACTED]
Hashmall, Joseph	5/19/2023	\$770.00	0.3	231	Call with Michelle Drake regarding [REDACTED]
Hashmall, Joseph	5/19/2023	\$770.00	0.9	693	Review of Michelle Drake's comments [REDACTED], emails with Michelle Drake and with expert regarding [REDACTED]
Hashmall, Joseph	5/19/2023	\$770.00	0.2	154	Email to court reporter regarding transcripts
Hashmall, Joseph	5/19/2023	\$770.00	0.2	154	Email exchange with MeridianLink counsel regarding missing data

Hashmall, Joseph	5/22/2023	\$770.00	0.8	616	Review of ██████████ internal emails regarding same
Hashmall, Joseph	5/22/2023	\$770.00	0.5	385	Calls with expert regarding ██████████
Hashmall, Joseph	5/22/2023	\$770.00	0.8	616	Edits ██████████, emails with expert regarding ██████████
Hashmall, Joseph	5/22/2023	\$770.00	0.8	616	Drafting demand letter, internal email regarding same
Hashmall, Joseph	5/22/2023	\$770.00	0.2	154	Call with Michelle Drake regarding ██████████
Hibray, Jean	5/22/2023	\$450.00	0.2	90	Emails re ██████████
Hibray, Jean	5/22/2023	\$450.00	0.3	135	Finalize and e-serve expert report/exhibits
Drake, Eleanor Michelle	5/22/2023	\$1,180.00	1	1180	call re ██████████
Drake, Eleanor Michelle	5/22/2023	\$1,180.00	5.2	6136	review and comment on ██████████, communicate with ██████████
Hashmall, Joseph	5/23/2023	\$770.00	0.5	385	Updates to draft demand letter, internal email regarding same
Hibray, Jean	5/24/2023	\$450.00	0.2	90	Retrieve new data, transfers of same
Hashmall, Joseph	5/24/2023	\$770.00	0.6	462	Review of email from MeridianLink counsel regarding additional data, internal emails and email to expert regarding same
Hashmall, Joseph	5/24/2023	\$770.00	0.2	154	Internal email regarding demand letter
Hashmall, Joseph	5/24/2023	\$770.00	0.6	462	Review of case file in advance of drafting motion for class certification
Hashmall, Joseph	5/25/2023	\$770.00	0.2	154	Internal email regarding demand letter
Hashmall, Joseph	5/25/2023	\$770.00	0.2	154	Internal emails regarding depo errata
Hashmall, Joseph	5/30/2023	\$770.00	0.9	693	Emails with expert and emails with MeridianLink counsel regarding named Plaintiff data
Drake, Eleanor Michelle	5/30/2023	\$1,180.00	0.5	590	review correspondence re additional data; email with JCH re settlement demand
Hashmall, Joseph	6/2/2023	\$770.00	0.5	385	Downloading additional data from MeridianLink, emails with MeridianLink counsel and expert regarding same
Hashmall, Joseph	6/6/2023	\$770.00	1.8	1386	Review of Defendant's expert reports, internal emails regarding same
Hashmall, Joseph	6/6/2023	\$770.00	0.4	308	Emails with expert ██████████
Hibray, Jean	6/6/2023	\$450.00	0.2	90	Docket def's expert reports
Drake, Eleanor Michelle	6/6/2023	\$1,180.00	3.4	4012	review D expert reports, email J Hashmall re same
Hashmall, Joseph	6/7/2023	\$770.00	0.5	385	Internal emails regarding depositions notices for Defendant's experts, review of drafts of same
Hashmall, Joseph	6/7/2023	\$770.00	0.6	462	Emails with expert regarding ██████████
Hashmall, Joseph	6/7/2023	\$770.00	1	770	Updates to draft demand letter, internal emails regarding same, email to opposing counsel attaching same
Hashmall, Joseph	6/7/2023	\$770.00	0.8	616	Emails with Michelle Drake regarding next steps in case, review of discovery materials for same discussion
Hashmall, Joseph	6/7/2023	\$770.00	0.7	539	Emails with ██████████ response to Defendant's expert report
Hashmall, Joseph	6/7/2023	\$770.00	0.4	308	Call with Michelle Drake regarding next steps in case
Hibray, Jean	6/7/2023	\$450.00	0.2	90	Emails to gather mediators' availability
Hibray, Jean	6/7/2023	\$450.00	0.2	90	Prep depo subs for Defendant's experts
Hibray, Jean	6/7/2023	\$450.00	0.2	90	Finalize dep subs to def's experts, e-serve same
Hibray, Jean	6/7/2023	\$450.00	0.1	45	ShareFile ██████████
Drake, Eleanor Michelle	6/7/2023	\$1,180.00	1.4	1652	review redline and revise draft settlement demand
Hashmall, Joseph	6/8/2023	\$770.00	0.3	231	Call with opposing counsel regarding settlement, stay of case
Hashmall, Joseph	6/8/2023	\$770.00	0.3	231	Email with Michelle Drake regarding next steps in case
Hashmall, Joseph	6/8/2023	\$770.00	0.2	154	Call with opposing counsel regarding settlement
Drake, Eleanor Michelle	6/8/2023	\$1,180.00	0.5	590	emails with J Hashmall re demand letter and settlement strategy
Hashmall, Joseph	6/12/2023	\$770.00	0.5	385	Review of draft motion to stay, email with opposing counsel regarding same
Hashmall, Joseph	6/12/2023	\$770.00	0.3	231	Email to opposing counsel regarding expert subpoenas, internal emails regarding same
Hashmall, Joseph	6/12/2023	\$770.00	0.4	308	Call with opposing counsel regarding settlement demand, internal emails regarding same
Drake, Eleanor Michelle	6/12/2023	\$1,180.00	0.4	472	email with J Hashmall re settlement demand and stay
Hashmall, Joseph	6/13/2023	\$770.00	0.2	154	Emails with expert regarding ██████████
Hashmall, Joseph	6/13/2023	\$770.00	0.5	385	Revisions to settlement demand, email to opposing counsel regarding same
Gionnette, Julie	6/14/2023	\$285.00	0.3	85.5	download and review order; calendar deadlines
Hashmall, Joseph	6/15/2023	\$770.00	0.2	154	Email to opposing counsel regarding mediation plan
Hashmall, Joseph	6/16/2023	\$770.00	0.4	308	Emails with accounting regarding ██████████
Hashmall, Joseph	6/16/2023	\$770.00	0.2	154	Call with opposing counsel regarding settlement, mediator selection
Hashmall, Joseph	6/20/2023	\$770.00	0.2	154	Internal email regarding deposition invoice
Hashmall, Joseph	6/20/2023	\$770.00	0.2	154	Email to opposing counsel regarding mediation plan
Hashmall, Joseph	6/20/2023	\$770.00	0.2	154	Review of file status
Hashmall, Joseph	6/23/2023	\$770.00	0.2	154	Email to opposing counsel regarding settlement
Hashmall, Joseph	6/26/2023	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	6/26/2023	\$1,180.00	0.1	118	team meeting to touch base on case status
Hashmall, Joseph	6/28/2023	\$770.00	0.3	231	Email to opposing counsel regarding mediation plan
Hashmall, Joseph	6/29/2023	\$770.00	0.1	77	Internal email regarding client ██████████

Hibray, Jean	6/29/2023	\$450.00	0.1	45	Draft update ltr blurb
Hashmall, Joseph	6/30/2023	\$770.00	0.2	154	Voicemail to opposing counsel regarding settlement
Hibray, Jean	7/5/2023	\$450.00	0.3	135	Prepare and send [REDACTED]
Hashmall, Joseph	7/5/2023	\$770.00	0.1	77	Email to opposing counsel regarding time to discuss settlement
Hashmall, Joseph	7/7/2023	\$770.00	0.7	539	Call and email with opposing counsel regarding settlement, internal emails regarding next steps
Hashmall, Joseph	7/12/2023	\$770.00	0.2	154	Email to opposing counsel regarding joint status report
Hashmall, Joseph	7/13/2023	\$770.00	0.8	616	Email exchange with opposing counsel regarding settlement, review of draft letter to the court regarding settlement talks, review of Defendant's settlement proposal, internal email regarding same
Gionnette, Julie	7/14/2023	\$285.00	0.1	28.5	download and review order; calendar deadline
Drake, Eleanor Michelle	7/14/2023	\$1,180.00	0.7	826	respond to D most recent settlement offer
Hashmall, Joseph	7/17/2023	\$770.00	0.2	154	Internal emails regarding deposition invoices
Hashmall, Joseph	7/19/2023	\$770.00	0.2	154	Internal email regarding deposition invoices
Hashmall, Joseph	7/19/2023	\$770.00	0.1	77	Internal review of case status and deadlines
Hashmall, Joseph	7/20/2023	\$770.00	0.2	154	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	7/24/2023	\$770.00	0.2	154	Internal emails regarding deposition invoices
Hashmall, Joseph	7/26/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	7/27/2023	\$770.00	0.7	539	Call with opposing counsel regarding settlement, follow up emails with Michelle Drake regarding same
Hashmall, Joseph	7/28/2023	\$770.00	0.2	154	Review of case status
Hashmall, Joseph	7/31/2023	\$770.00	0.4	308	Review of status of settlement talks, call with Michelle Drake regarding next steps in same
Drake, Eleanor Michelle	7/31/2023	\$1,180.00	0.5	590	call with J Hashmall re status of negotiations
Hashmall, Joseph	8/2/2023	\$770.00	0.1	77	Internal email regarding settlement talk status
Hibray, Jean	8/2/2023	\$450.00	0.1	45	Circulate fees and costs
Drake, Eleanor Michelle	8/2/2023	\$1,180.00	0.5	590	call with D Gettings re settlement negotiations
Hashmall, Joseph	8/4/2023	\$770.00	0.3	231	Review of status of settlement talks
Hashmall, Joseph	8/7/2023	\$770.00	0.1	77	Internal email regarding settlement talk status
Hashmall, Joseph	8/7/2023	\$770.00	0.1	77	Internal email regarding settlement talk status
Hashmall, Joseph	8/7/2023	\$770.00	0.1	77	Litigation team meeting
Hashmall, Joseph	8/7/2023	\$770.00	0.3	231	Internal emails and email to opposing counsel regarding settlement
Drake, Eleanor Michelle	8/7/2023	\$1,180.00	0.1	118	team meeting re case status and moving forward
Drake, Eleanor Michelle	8/7/2023	\$1,180.00	0.5	590	call with D Gettings re settlement possibilities
Hashmall, Joseph	8/14/2023	\$770.00	1.2	924	Review of draft letter to court regarding stay of case, internal emails and emails with opposing counsel regarding same
Hibray, Jean	8/14/2023	\$450.00	0.4	180	Draft status update letter, finalize and submit
Hashmall, Joseph	8/15/2023	\$770.00	0.8	616	Internal emails, email to opposing counsel regarding next move in settlement talks
Gionnette, Julie	8/18/2023	\$285.00	0.1	28.5	download and review order extending stay; calendar next status report deadline
Hashmall, Joseph	8/28/2023	\$770.00	0.1	77	Email to opposing counsel regarding settlement status
Drake, Eleanor Michelle	8/31/2023	\$1,180.00	0.1	118	meet with team re next steps
Hashmall, Joseph	8/31/2023	\$770.00	0.2	154	Email to opposing counsel regarding settlement
Hashmall, Joseph	8/31/2023	\$770.00	0.1	77	Litigation team meeting
Hashmall, Joseph	9/5/2023	\$770.00	0.2	154	Call with opposing counsel regarding case resolution
Hashmall, Joseph	9/12/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	9/13/2023	\$770.00	0.7	539	Review of Defendant's revised settlement offer, internal emails regarding response to same
Hashmall, Joseph	9/13/2023	\$770.00	0.3	231	Review of draft status update to court, emails to opposing counsel regarding same
Hashmall, Joseph	9/14/2023	\$770.00	0.1	77	Review of status update to Court
Hashmall, Joseph	9/14/2023	\$770.00	0.5	385	Revisions to draft R. 408 communication to opposing counsel internal emails regarding same, email to opposing counsel regarding same
Drake, Eleanor Michelle	9/14/2023	\$1,180.00	0.8	944	review correspondence to date; emails with J Hashmall re counter, email oc re status and counteroffer. [REDACTED]
Gionnette, Julie	9/19/2023	\$285.00	0.2	57	download and review docket entry (ECF 38); calendar deadline
Hashmall, Joseph	9/20/2023	\$770.00	0.7	539	Review of status of settlement talks, Court's recent order, email to opposing counsel regarding same
Hashmall, Joseph	9/27/2023	\$770.00	0.3	231	Email to opposing counsel regarding settlement talks, internal email regarding same
Hashmall, Joseph	9/29/2023	\$770.00	0.6	462	Review of revised settlement offer from Defendant, internal emails regarding response to same
Hashmall, Joseph	10/2/2023	\$770.00	0.3	231	Internal emails and emails with opposing counsel setting call to discuss settlement
Hashmall, Joseph	10/3/2023	\$770.00	0.5	385	Call with opposing counsel regarding settlement of case
Hashmall, Joseph	10/3/2023	\$770.00	0.2	154	Call with Michelle Drake regarding settlement of case
Drake, Eleanor Michelle	10/3/2023	\$1,180.00	0.8	944	calls and emails with oc re potential resolution
Hashmall, Joseph	10/4/2023	\$770.00	0.4	308	Call with client Noon regarding [REDACTED]
Hashmall, Joseph	10/4/2023	\$770.00	0.3	231	Voicemail and email to client Hinkel, [REDACTED]

Hashmall, Joseph	10/5/2023	\$770.00	0.2	154	Litigation team meeting
Drake, Eleanor Michelle	10/5/2023	\$1,180.00	0.1	118	team meeting to discuss case status
Hashmall, Joseph	10/6/2023	\$770.00	0.3	231	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	10/9/2023	\$770.00	0.4	308	Call with client Hinkel regarding [REDACTED] internal email regarding [REDACTED]
Hashmall, Joseph	10/11/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding status of settlement
Hashmall, Joseph	10/12/2023	\$770.00	1.2	924	Emails with Michelle Drake regarding status report due to court, preparing draft of same
Hashmall, Joseph	10/12/2023	\$770.00	0.9	693	Review of Defendant's revised proposed settlement terms, internal emails regarding response to same
Gionnette, Julie	10/13/2023	\$285.00	0.1	28.5	download and review docket entry (ECF 39)
Hibray, Jean	10/13/2023	\$450.00	0.5	225	Draft joint notice of settlement, finalize and file same.
Hashmall, Joseph	10/13/2023	\$770.00	2.2	1694	Emails with opposing counsel regarding terms of settlement, internal emails regarding notice of settlement, pre-filing review of notice of settlement
Hashmall, Joseph	10/17/2023	\$770.00	0.1	77	Email to opposing counsel regarding draft settlement
Hashmall, Joseph	10/19/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of draft settlement
Hashmall, Joseph	10/20/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding status of draft settlement
Hashmall, Joseph	10/30/2023	\$770.00	0.1	77	Email to opposing counsel regarding draft settlement
Hashmall, Joseph	11/9/2023	\$770.00	0.1	77	Litigation team call
Drake, Eleanor Michelle	11/9/2023	\$1,180.00	0.1	118	call with team to discuss deadlines and next steps
Hashmall, Joseph	11/13/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding draft settlement
Hashmall, Joseph	11/16/2023	\$770.00	0.2	154	Email to client Hinkel [REDACTED]
Hashmall, Joseph	11/16/2023	\$770.00	0.2	154	Email to client Noon [REDACTED]
Hashmall, Joseph	11/22/2023	\$770.00	0.5	385	Email exchange with opposing counsel regarding settlement structure
Hashmall, Joseph	11/27/2023	\$770.00	0.4	308	Calculations regarding [REDACTED] internal emails regarding [REDACTED]
Hashmall, Joseph	11/28/2023	\$770.00	0.3	231	Internal emails regarding settlement calculations
Drake, Eleanor Michelle	11/28/2023	\$1,180.00	0.7	826	review D proposed release language, correspondence with Joe Hashmall re [REDACTED]
Hashmall, Joseph	11/29/2023	\$770.00	0.3	231	Call with opposing counsel regarding draft settlement
Drake, Eleanor Michelle	11/29/2023	\$1,180.00	0.5	590	call with oc and follow up with J Hashmall re settlement documents
Hibray, Jean	12/5/2023	\$450.00	0.1	45	Draft request to extend pa motion deadline
Hashmall, Joseph	12/5/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of settlement
Hashmall, Joseph	12/5/2023	\$770.00	0.4	308	Internal emails regarding request for extension
Hashmall, Joseph	12/6/2023	\$770.00	0.2	154	Review of and edits to draft request for extension
Hibray, Jean	12/7/2023	\$450.00	0.2	90	Finalize letter for extension, send same
Hashmall, Joseph	12/7/2023	\$770.00	0.5	385	Internal emails and emails with opposing counsel regarding filing request for extension of time
Gionnette, Julie	12/12/2023	\$285.00	0.1	28.5	review court order (ECF 40); update calendar deadline
Hashmall, Joseph	12/13/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding draft settlement
Hashmall, Joseph	12/14/2023	\$770.00	0.1	77	Litigation team meeting
Drake, Eleanor Michelle	12/14/2023	\$1,180.00	0.1	118	meet with team re next steps
Hashmall, Joseph	12/18/2023	\$770.00	0.1	77	Email to opposing counsel regarding settlement status
Hashmall, Joseph	12/21/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of settlement papers
Hashmall, Joseph	12/21/2023	\$770.00	0.2	154	Review of case schedule and timeline
Hashmall, Joseph	12/27/2023	\$770.00	2.1	1617	Review of and edits to draft complaint, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	12/27/2023	\$770.00	1	770	Review of draft exhibits to the settlement agreement, internal emails and email to opposing counsel regarding same
Hibray, Jean	12/27/2023	\$450.00	0.8	360	Review agreement, prepare exhibits
Drake, Eleanor Michelle	12/27/2023	\$1,180.00	0.5	590	review draft agreement, email J Hashmall with changes
Hashmall, Joseph	12/28/2023	\$770.00	0.6	462	Calculating [REDACTED], internal emails regarding same
Hashmall, Joseph	1/2/2024	\$770.00	0.2	154	Internal email regarding preliminary approval brief
Hashmall, Joseph	1/2/2024	\$770.00	0.2	154	Email exchange with opposing counsel regarding draft settlement
Hibray, Jean	1/2/2024	\$450.00	0.3	135	Review agreement, set up Timeline
Hibray, Jean	1/2/2024	\$450.00	2.4	1080	Draft prelim approval memo
Hashmall, Joseph	1/3/2024	\$770.00	0.2	154	Email to administrator requesting bid
Hashmall, Joseph	1/3/2024	\$770.00	0.3	231	Email to clients regarding [REDACTED]
Hashmall, Joseph	1/3/2024	\$770.00	0.1	77	Email to opposing counsel regarding settlement edits
Hashmall, Joseph	1/3/2024	\$770.00	0.3	231	Review of bid from settlement admin, internal email regarding same
Hashmall, Joseph	1/3/2024	\$770.00	1.5	1155	Edits to draft preliminary approval brief, internal email regarding same
Hashmall, Joseph	1/4/2024	\$770.00	0.8	616	Edits to preliminary approval brief
Hashmall, Joseph	1/4/2024	\$770.00	0.3	231	Emails to opposing counsel and administrator regarding administration bid
Drake, Eleanor Michelle	1/4/2024	\$1,180.00	0.6	708	review motion for preliminary approval--send comments to J Hashmall
Hashmall, Joseph	1/5/2024	\$770.00	0.5	385	Emails and voicemail with opposing counsel regarding edits to draft settlement

Hashmall, Joseph	1/5/2024	\$770.00	0.6	462	Review of revised settlement administration bid, corresponding edits to preliminary approval brief
Hashmall, Joseph	1/5/2024	\$770.00	0.2	154	Call with Michelle Drake regarding edit to settlement agreement
Hashmall, Joseph	1/5/2024	\$770.00	0.5	385	Revising settlement documents, emails to clients [REDACTED]
Hashmall, Joseph	1/5/2024	\$770.00	0.1	77	Email retaining settlement administrator
Hashmall, Joseph	1/5/2024	\$770.00	0.5	385	Review of edits to draft preliminary approval brief, further edits to same
Hibray, Jean	1/5/2024	\$450.00	0.1	45	Send [REDACTED]
Drake, Eleanor Michelle	1/5/2024	\$1,180.00	0.5	590	final review and approval of memo in support of preliminary settlement approval
Hashmall, Joseph	1/8/2024	\$770.00	0.4	308	Internal emails and emails to opposing counsel regarding execution of settlement agreement
Hashmall, Joseph	1/8/2024	\$770.00	1.6	1232	Final pre-filing review of preliminary approval motion and supporting documents
Hibray, Jean	1/8/2024	\$450.00	0.7	315	Prepare fully executed agreement PDF, PDF exhibits and append. [REDACTED], emails re same.
Hibray, Jean	1/8/2024	\$450.00	1	450	Proof, finalize prelim approval brief. Draft accompanying dec, motion, prepare PAO for submission.
Hibray, Jean	1/8/2024	\$450.00	0.8	360	Finalize and file motion for prelim approval. Prepare judge copies and travel to/from drop off of same. Send copies to admin for posting.
Hashmall, Joseph	1/9/2024	\$770.00	0.2	154	Call with admin regarding edits to administration bid, review of revised bid, internal emails regarding same
Hashmall, Joseph	1/12/2024	\$770.00	0.6	462	Review of draft settlement notices, edits to same, email to admin regarding same
Hashmall, Joseph	1/15/2024	\$770.00	0.2	154	Email exchange with administrator regarding settlement website
Hashmall, Joseph	1/16/2024	\$770.00	0.1	77	Review of revised administrator engagement letter
Hashmall, Joseph	1/19/2024	\$770.00	0.3	231	Review of draft email notices, email to administrator regarding edits to same
Hashmall, Joseph	1/23/2024	\$770.00	1.2	924	Review of preliminary approval order, internal emails and emails with administrator regarding same
Gionnette, Julie	1/23/2024	\$285.00	0.3	85.5	review preliminary approval order (ECF 42); calendar deadlines
Hibray, Jean	1/23/2024	\$450.00	0.5	225	Review PAO, review docketing, timeline. Update as needed, email re admin change
Hashmall, Joseph	1/29/2024	\$770.00	0.3	231	Emails to clients regarding [REDACTED]
Hashmall, Joseph	1/30/2024	\$770.00	0.3	231	Emails to administrator regarding [REDACTED]
Drake, Eleanor Michelle	1/30/2024	\$1,180.00	0.1	118	team call to touch base on next steps in litigation
Hashmall, Joseph	1/31/2024	\$770.00	0.5	385	Emails with settlement administrator regarding class list
Hashmall, Joseph	2/8/2024	\$770.00	0.4	308	Review of draft settlement website, email to admin regarding edit to same
Hashmall, Joseph	2/12/2024	\$770.00	0.3	231	Email exchange with admin regarding claims process
Hashmall, Joseph	2/12/2024	\$770.00	0.4	308	Emails with clients regarding [REDACTED]
Hashmall, Joseph	2/12/2024	\$770.00	0.1	77	Internal email regarding drafting of fee petition
Hashmall, Joseph	2/16/2024	\$770.00	0.2	154	Emails to the administrator and to client Hinkel regarding [REDACTED]
Hashmall, Joseph	2/19/2024	\$770.00	0.2	154	Email exchange with admin regarding claims
Hashmall, Joseph	2/26/2024	\$770.00	0.1	77	Internal emails regarding fee petition
Hashmall, Joseph	3/4/2024	\$770.00	0.2	154	Review of administrator invoice, email exchange regarding same
Hashmall, Joseph	3/5/2024	\$770.00	0.3	231	Internal emails and emails with client Noon regarding [REDACTED]
Hashmall, Joseph	3/8/2024	\$770.00	0.2	154	Internal email regarding follow up call with client Noon
Hashmall, Joseph	3/11/2024	\$770.00	0.3	231	Call to class member with questions regarding settlement
Hashmall, Joseph	3/12/2024	\$770.00	1.1	847	Edits to draft fee petition, internal emails regarding same
Hashmall, Joseph	3/13/2024	\$770.00	0.5	385	Edits to fee petition, internal emails regarding same
Hashmall, Joseph	3/14/2024	\$770.00	0.1	77	Internal email regarding staffing final approval hearing
Hashmall, Joseph	3/14/2024	\$770.00	1.3	1001	Edits to fee petition, internal emails regarding same