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15 **UNITED STATES DISTRICT COURT FOR THE**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 ALICIA HERNANDEZ et al., individually
18 and on behalf of all others similarly situated

19 Plaintiffs,

20 v.

21 WELLS FARGO BANK, N.A.,

22 Defendant.
23
24
25
26
27
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Case No. 3:18-cv-07354 -WHA

**JOINT DECLARATION OF
MICHAEL L. SCHRAG AND
RICHARD M. PAUL IN SUPPORT
OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF PROPOSED
CLASS ACTION SETTLEMENT
AND MOTION FOR ATTORNEY'S
FEES AND REIMBURSEMENT OF
EXPENSES**

Date: August 20, 2020

Time: 8 a.m.

Dept: Courtroom 12

Judge: Hon. William H. Alsup

1 We, Michael Schrag and Richard Paul, declare as follows:

2 1. We are Class Counsel for the certified class and this case, and partners at Gibbs Law Group
3 LLP and Paul LLP, respectively. We have worked on this case and supervised the work of others in our
4 firms from the investigative stage through the settlement approval process. We make this joint
5 declaration based on personal knowledge and review of our firms' case files.

6 2. We have both litigated class and complex cases for well over twenty years and based on our
7 experience and deep knowledge of the facts and legal issues in this case, fully support this settlement.
8 As we detail below, the facts of this case are strong for the class, but mortgage foreclosure law heavily
9 favors banks. Thus, the risks on both liability and damages remained high. The \$18.5 million all cash,
10 non-reversionary settlement that will provide between \$14,000-\$120,000 in net settlement payments to
11 class members provides more relief than comparable loan modification-related settlements and is, under
12 the circumstances here, a fair deal for class members.

13 3. The quality of this settlement and the amount of work it took to achieve it support the
14 requested fee of \$4,525,000 which is 25% of the net settlement fund of \$18.1 million (\$18.5 million
15 minus \$335,000 in litigation costs and \$65,000 in settlement administration expenses). Indeed, a
16 lodestar cross-check shows that the requested award represents a 1.2 multiplier on our \$3,758,689
17 lodestar. This multiplier is at the low range of what courts award and is reasonable, particularly given
18 that the reported lodestar reflects over \$1.4 million in "billing judgment" reductions. To provide the
19 Court a deeper view into our lodestar, we categorized all work, project-by-project, and also show how
20 much work each attorney performed. *See* Exh. A.

21 **I. Overview of the Litigation and Settlement**

22 4. We filed this case in December 2018, soon after Wells Fargo publicly disclosed in an SEC
23 filing that due to a software error, it had wrongfully denied trial loan modifications to over 800
24 borrowers who qualified for a modification under the Home Affordable Modification Program
25 (HAMP). Of those, Wells Fargo admitted to foreclosing on over 500 borrowers' homes.

26 5. Class Counsel vigorously prosecuted this case, while Wells Fargo consistently denied
27 liability and contested our legal theories and damages calculations. We briefed and argued a motion to
28 transfer, two motions to dismiss, five discovery letter briefs, class certification, and fully briefed partial

1 summary judgment. Class Counsel also completed robust fact and expert discovery: we reviewed over
2 200,000 pages of documents¹ and deposed seven Wells Fargo employees in Iowa, Oregon, North
3 Carolina, Minnesota, and Southern California. *See* Exh. B. We also served five sets of interrogatories
4 and three sets of requests for production (to which Wells Fargo responded and later supplemented on
5 several occasions).

6 6. During discovery, Class Counsel prepared a descriptive chronology of all the hot documents
7 and began the process of culling the list down to create an exhibit list for trial and identify the witnesses
8 who would authenticate each document.

9 7. Class Counsel also spent many hours assisting the 15 named Plaintiffs in responding to
10 discovery Wells Fargo served, and defending their depositions. The bank served three sets of
11 interrogatories to Plaintiff Alicia Hernandez and two sets of interrogatories to the other fourteen
12 Plaintiffs named in the first amended complaint. The bank also served separate requests for production
13 to each of those named Plaintiffs and a second set of requests for production to selected named
14 Plaintiffs. All told, we responded to over 50 discovery requests on behalf of the named Plaintiffs. Class
15 Counsel also collected, reviewed, and produced all loan-related documents Plaintiffs had.

16 8. Wells Fargo deposed each of the 16 named Plaintiffs (which includes class representative
17 Sandra Campos, who was added as a named Plaintiff in the third amended complaint) as well as 18
18 other absent class members throughout California. Class Counsel spent many hours reviewing each
19 class member's loan file (typically hundreds, if not thousands of pages, and often produced a day or
20 two before the deposition), reviewing and producing relevant documents in response to Wells Fargo's
21 subpoenas, preparing each for his or her deposition, and defending the depositions, which often lasted
22 all day.

23 9. During discovery, the parties engaged in numerous meet-and-confer discussions. Through
24 these efforts, we were able to resolve many issues, but still submitted more than five discovery disputes
25 to the Court. The Court ultimately compelled Wells Fargo to produce several categories of discovery,
26

27 _____
28 ¹ The 200,000-page count is only part of the story. Many of the documents were large Excel
spreadsheets that included hundreds, sometimes thousands, of lines of substantive data, including data
regarding the specific calculation error at issue in this case.

1 including testimony regarding the bank’s efforts to comply with government consent orders and
2 documents regarding loan modification practices that were given to certain board-level committees.

3 10. We retained two experts who supplied merits reports. Banking veteran Brian Kelley opined
4 that Wells Fargo’s banking practices were inadequate and inconsistent with industry norms, and
5 damages expert Dan Salah developed methodologies to reasonably calculate class damages. Class
6 Counsel defended Kelley’s and Salah’s depositions. We also deposed the two experts Wells Fargo hired
7 to rebut Kelley’s and Salah’s opinions.

8 11. The parties did not begin settlement negotiations until after the case had been pending for
9 over a year and the Court had granted class certification. On March 3, 2020, the parties participated in a
10 settlement conference with Magistrate Judge Ryu. During that time, Plaintiffs were in the midst of
11 opposing Wells Fargo’s summary judgment motion. Judge Ryu had numerous phone calls with the
12 parties before and after the settlement conference; she also analyzed both shared and confidential
13 mediation statements. Although the parties did not reach an agreement on the day of the settlement
14 conference, they agreed to consider a mediator’s proposal from Judge Ryu. Two days later, the parties
15 agreed to Judge Ryu’s monetary proposal and over the next three weeks negotiated the remaining
16 material terms, including the allocation and notice plans, under her supervision. On March 26, the
17 parties executed the formal Settlement Agreement. (Dkt. 269-2.)

18 12. The Settlement Agreement is the only agreement between the parties; the parties have no
19 undisclosed agreement made in connection with the settlement proposal.

20 13. On April 19, 2020, the Court entered an order preliminarily approving the \$18.5 million
21 settlement fund and notice plan. (Dkt. 277.) The Court also affirmed its prior order appointing Debora
22 Granja and Sandra Campos as class representatives and Gibbs Law Group LLP and Paul LLP as Class
23 Counsel. (Dkt. 277; Dkt. 217 at 4.)

24 14. The parties retained the services of an experienced settlement administrator, JND Legal
25 Administration. Wells Fargo solicited bids from three qualified administrators. In addition to JND, the
26 bank solicited bids from KCC and Epiq. The parties ultimately selected JND because it submitted the
27 lowest bid and had a reputation for being able to handle the class administrator duties necessary in this
28

1 case. JND developed a robust notice program, as described in the declaration of Jennifer Keough filed
2 in connection with preliminary approval. (Dkt. 269-10.)

3 15. Since the Court preliminarily approved the settlement, JND and the parties established a
4 settlement website at www.homeloanmodificationsettlement.com. The website includes important
5 pleadings, a full version of the notice in both English and Spanish, and provides up-to-date information
6 about the settlement approval process. The website also includes contact information for the settlement
7 administrator and Class Counsel. Additionally, the website allows class members to electronically
8 submit the severe emotional distress claim form and any supporting documentation. As of June 4, there
9 have been over 2,000 unique visitors and 7,400 page views on the settlement website.

10 16. On May 18, 2020, notice was disseminated to each class member via first-class mail. Wells
11 Fargo provided the most recent names and addresses for each class member to JND. As part of its
12 remediation program, Wells Fargo mailed letters to each class member and employed detailed skip
13 tracing procedures for any letters returned as undeliverable. JND supplemented this work by
14 performing a National Change of Address search and conducted advanced address updating using a
15 variety of tools, such as LexisNexis, to obtain a current address. The notices were sent in envelopes that
16 were stamped with the phrase “NOTICE RE: WELLS FARGO LOAN MODIFICATION
17 SETTLEMENT,” to make it more likely they would be opened rather than thrown away as junk mail.
18 (Dkt. 12.) After the initial mailing, JND received 33 notices returned as undeliverable. JND’s research
19 identified updated addresses for 27 of those undeliverable notices, which were re-mailed. JND is using
20 additional search tools to research the remaining six names in continuing efforts to have notice reach all
21 class members.

22 17. No longer than 10 days before the final approval hearing, JND will file a declaration
23 attesting that notice was disseminated in accordance with the settlement. (Dkt. 276-1 at 6; Dkt. 277.)

24 18. The deadline for class members to opt out or object is July 2, 2020. (*Id.*) Therefore, we will
25 wait for our reply brief, due on July 23, 2020, to address the class’s reaction to the settlement. As of
26 June 8, however, no class member has objected or asked to be excluded.

27 19. The \$18.5 million settlement fund represents approximately 37% of the economic damages
28 Class Counsel estimate the class could have recovered on their best day at trial. During the same period

1 that the parties were working with Judge Ryu to settle this case, Class Counsel were also working with
2 our damages expert, Dan Salah, to calculate class-wide damages. Salah had submitted an expert report
3 on the named Plaintiffs' and California class members' damages before the class was certified. Using
4 the exact same model that he used in this expert report (submitted to the Court at Dkt. 192-12), Salah
5 estimated the aggregate nationwide class economic damages to be approximately \$65 million. This
6 included both lost equity and lost use damages. As in his report, Salah relied on a combination of
7 publicly available data and data provided by Wells Fargo for each class member. *Id.* The \$65 million
8 does not subtract out the approximately \$15 million in remediation payments already paid, and does not
9 include seven class members whom Wells Fargo identified and disclosed later in the settlement
10 negotiations process. Thus, the \$15 million in remediation payments would have been credited against
11 any judgment – meaning that a judgment of approximately \$50 million would have been the best result
12 if *everything* worked in the class's favor at summary judgment, trial, and on appeals. Recovering \$18.5
13 out of a possible \$50 million yields 37%.

14 20. Wells Fargo further argued that the class certification order limited the class to pursuing
15 only lost equity damages at trial. Dkt. 252 at 1 (asserting that the “only purpose” of the class trial is to
16 determine breach of contract liability and lost equity damages). Plaintiffs' expert estimated that the
17 class's lost equity damages were \$37.9 million and, again, Wells Fargo already paid \$15 million in
18 remediation. Thus, while Plaintiffs disagreed that contract damages should be limited to lost equity, if
19 Wells Fargo prevailed on that issue, and if the remediation payments offset those amounts, the class's
20 maximum recovery would have been only \$22.9 million (\$37.9m-\$15m) and the settlement is 80% of
21 that amount. Moreover, Wells Fargo vigorously asserted that the class was entitled to little or no lost
22 equity damages because such damages must be measured at the time of the foreclosure when most class
23 members' homes were “under water.”

24 21. Indeed, Wells Fargo argued it was not liable at all and owed no damages to the class. The
25 bank cited case law that under the contracts at issue, a loan modification would not cure a default and
26 thus did not have to be disclosed. Had the bank prevailed on that argument, the class would have lost
27 the breach of contract claim, the only claim the Court certified. These risks highlight the fairness and
28 adequacy of the settlement.

1 22. In this context, Class Counsel strongly believe the \$18.5 million non-reversionary settlement
2 is fair, reasonable, and adequate.

3 23. The settlement fairly allocates net settlement proceeds to class members. The net settlement
4 proceeds (after attorney's fees, costs, and administration expenses are deducted) will be divided into an
5 Economic Damages Fund and a Severe Emotional Distress Fund. All but \$1 million will go into the
6 Economic Damages Fund.

7 24. For the Economic Damages Fund, the allocation plan (1) sets a minimum payment of
8 \$14,000 per class member to provide each with significant relief for having to undergo the wrongful
9 denial and foreclosure; (2) considers the amount of remediation payments already received from Wells
10 Fargo; (3) provides class members at least 38%² of their unpaid principal balance at the time of the
11 decision error, reduced by 5% for every six months of delinquency. (*See* Allocation Plan, Dkt. 276-3.)

12 25. The plan uses unpaid principal balance as a proxy for the value of the modification denied
13 because, in general, class members with larger unpaid principal balances are more likely to have
14 suffered more lost equity and, under Plaintiffs' theory, more damages as a result of the lost
15 modification opportunity. The settlement will provide at least \$14,000 and as much as \$119,934 to each
16 class member with no need to file a claim.

17 26. JND will distribute settlement proceeds from the Economic Damages Fund directly to class
18 members by check without requiring a claims process.

19 27. Class members who seek additional funds for severe emotional distress can submit a simple
20 claim form to the settlement administrator, who will then provide all such claims to special master
21 Cathy Yanni. (Emotional Distress Claim Form, Dkt. 276-4.) Yanni, who has over two decades of
22 experience allocating settlement funds to injured plaintiffs, will decide the monetary awards for each
23 claimant. (Dkt. 277, Dkt. 279.) In addition to relying on her experience and discretion, Yanni will
24 consider (1) the severity of the emotional distress, *e.g.*, did it require mental health or medical treatment
25 or cause lack of functionality at home or work?; and (2) whether the trial payment denial, as opposed to
26 factors not related to this lawsuit, appeared to cause (or exacerbate) the emotional distress. (*See*

27
28 ² In its remediation program, Wells Fargo paid class members an average of 38% of their unpaid principal balance.

1 Declaration of Cathy Yanni, Dkt 269-11 at ¶ 10.) As of June 4, 37 class members have applied for
2 compensation from the severe emotional distress fund.

3 28. Each class member will receive his or her share of the settlement fund by check. If any
4 settlement checks are uncashed after 60 days or undeliverable, JND will make adequate and customary
5 efforts to contact and/or locate class members. JND will send a postcard reminder notice to any class
6 members who have not cashed their checks 60 days after issue. (Settlement Agreement, Dkt. 269-2 at §
7 V, ¶ D.)

8 **II. Attorney Qualifications and Breakdown of Time by Project**

9 **A. Overview**

10 29. To assist in the Court’s assessment of reasonable attorney’s fees, below we provide a
11 detailed summary of our firms’ work to litigate this action and deliver this settlement.

12 30. This joint declaration provides support for both of our firms’ hourly billing rates, litigation
13 costs, and other information that may be relevant to the Court’s consideration of final approval and the
14 requested fee and expense reimbursement. For example, we describe the qualifications, experience, and
15 role for each timekeeper for whom fees are sought, the normal hourly rate charged during the relevant
16 time period, and how these rates are comparable to the prevailing rates for complex and class action
17 attorneys.

18 31. In support of our request for attorney’s fees, we have categorized our detailed time entries to
19 show the work we did on 93 specific projects. *See* Exh. A. These entries are listed chronologically
20 within each project and include the date, attorney name, hourly rate, time spent, and a detailed
21 description of the work performed. We also provide the total lodestar for each project, after “billing
22 judgment.” The time and lodestar we report reflects a substantial reduction from the number of hours
23 attorneys (and paralegals) worked on the case.

24 32. We exercised our “billing judgment” to reduce hours that may have been excessive or
25 duplicative. For each project, we report how much time and lodestar we cut. As part of this process, we
26 chose not to submit *any* time for a few projects. For example, we excised all time spent briefing the first
27 motion for class certification and any work relating to John Kilpatrick (the expert who submitted a
28

1 report in connection with the first class certification motion). Finally, we provide a summary chart of
2 the total time and fees sought for each individual timekeeper.

3 33. Similarly, in support of our request for unreimbursed expenses, we provide an itemized
4 accounting for these expenses, including the date, description, and amount for each expense. The
5 expenses have also been divided into categories, such as “Air Transportation,” “Ground Travel,” and
6 “Expert Witness Fees.” *See* Exh. C.

7 34. Throughout the litigation, all timekeepers kept contemporaneous daily time records in one-
8 tenth of an hour increments that included a description of the tasks performed and the amount of time
9 spent performing those tasks. The contemporaneous time records were not always separated by each
10 discrete project, however, so the categorization in this declaration necessarily includes reasonable
11 estimates to divide the time in a single entry among two or more projects.

12 **B. The Attorneys Who Worked on the Case**

13 35. Three attorneys at Gibbs Law Group LLP and two attorneys at Paul LLP performed most of
14 the work on this case.

15 36. For Gibbs Law Group, Michael Schrag served as co-lead counsel and along with associates
16 Linda Lam and Josh Bloomfield, performed the majority of the attorney work for the firm.

17 37. Gibbs Law Group is a national litigation firm dedicated to representing plaintiffs in class
18 and collective actions in state and federal courts. The firm serves clients in consumer protection,
19 securities, antitrust, whistleblower, personal injury, and employment cases. A true and correct copy of
20 the Gibbs Law Group firm resume is attached as Exhibit D.

21 38. Michael Schrag is a member of the California State Bar and a partner at Gibbs Law Group.
22 For over 23 years, he has represented consumers and small businesses in a variety of class actions
23 against banks, credit card companies, insurers, and other large corporations. He joined Gibbs Law
24 Group in the spring of 2015. Exh. D at p. 11. He served as co-lead class counsel in a lawsuit against the
25 developer of the Hard Rock Hotel & Condominium project in San Diego, *Beaver v. Tarsadia Hotels*,
26 Case No. 11-cv-01842 (S.D. Cal.). The plaintiffs brought a UCL claim based on the developer’s failure
27 to disclose a right to rescind under the Interstate Land Sales Full Disclosure Act, 15 U.S.C. §§ 1701, *et*
28 *seq.* The case resulted in a \$51.1 million settlement and a Ninth Circuit ruling firmly establishing that

1 the UCL statute of limitations applies to all UCL actions, including those that “borrow” a federal
2 predicate violation with a shorter limitations period. *See Beaver v. Tarsadia Hotels*, 816 F.3d 1170,
3 1179-81 (9th Cir. 2016). That settlement paid substantial amounts to hundreds of class members, like
4 the present action; and, we were able to pay 100% of the class. Dkt. 328 at 2 in *Beaver*, Case No. 11-
5 cv-01842 (S.D. Cal.).

6 39. Mr. Schrag was also on the Plaintiffs’ Executive Committee in *In Re Wells Fargo Collateral*
7 *Protection Insurance Litigation*, Case No. 8:17-ML-2797-AG-KES (C.D. Cal.), which resulted in a
8 \$393 million settlement for consumers who had auto loans with Wells Fargo and were forced to buy
9 duplicative collateral protection insurance policies. Also, since 2015, he has served on the Expert
10 Committee in *In re: Disposable Contact Lens Antitrust Litig.*, MDL No. 2626, an antitrust class action
11 awaiting a trial date.

12 40. Before joining Gibbs Law Group, Mr. Schrag worked on a wide array of class actions,
13 including:

14 a. *Ammari Electronics et al. v. Pacific Bell Directory* (Alameda County Case No.
15 RG05198014). He was co-lead counsel in this class action on behalf of 375,000 California businesses
16 that advertised in the SBC Yellow Pages directories and were owed a refund because of incomplete
17 distribution of the directories. After a class trial and two appeals, a final judgment of over \$27 million
18 was entered for the class.

19 b. *In Re Currency Conversion Fee Litigation* (MDL No. 1409); *Schwartz v. Visa et al.*
20 (Alameda County Case No. 822404-4); *Shrieve v. Visa USA, Inc. et al.*, (Alameda County Case No.
21 RG04155097). He was part of the team litigating state and federal class actions against Visa,
22 MasterCard, and several large banks for failing to disclose and fixing the price of currency conversion
23 fees charged to cardholders who used credit cards in foreign countries. These cases resulted in a \$336
24 million dollar global settlement in the MDL action.

25 41. Mr. Schrag’s role was to, along with Mr. Paul, lead and manage the entire litigation,
26 including all strategic decisions. He played a role in writing and editing the complaints and all briefs
27 including the Rule 12(b)(6), motion to transfer, class certification, summary judgment, preliminary
28 approval, and final approval papers. He argued the order to show cause, motions to dismiss, motion to

1 transfer, class certification, and settlement approval motions. He and Mr. Paul had primary
2 responsibility for developing expert testimony, handling expert depositions, negotiating the settlement,
3 and steering the approval process.

4 42. Linda Lam has practiced law since 2014 and is a member of the California State Bar. Ms.
5 Lam joined Gibbs Law Group in 2015. In this case, Ms. Lam was primarily responsible for legal
6 research and writing, communicating with Plaintiffs and class members, drafting and responding to
7 discovery, arguing discovery motions, and defending Plaintiff depositions.

8 43. Josh Bloomfield has practiced law since 2001 and is a member of the California State Bar.
9 Mr. Bloomfield joined Gibbs Law Group in 2016. In this case, Mr. Bloomfield was primarily
10 responsible for legal research and writing, communicating with Plaintiffs and class members, drafting
11 and responding to discovery, arguing discovery motions, taking depositions of Wells Fargo executives,
12 and defending Plaintiff and class member depositions.

13 44. While Mr. Schrag, Ms. Lam, and Mr. Bloomfield handled most of the firm's work on this
14 case, other Gibbs Law Group attorneys made important contributions. For example, associate Aaron
15 Blumenthal helped develop and investigate the case and claims in the early stages. He also helped
16 communicate with Plaintiffs and class members. Partners Geoff Munroe and Andre Mura played key
17 roles in important briefing. Mr. Munroe helped research and develop the claims in the amended
18 complaints and helped draft the oppositions to the motions to dismiss and motion to transfer. Mr. Mura
19 helped draft the class certification motion and the opposition to Wells Fargo's summary judgment
20 motion.

21 45. Also from Gibbs Law Group, Craig Rosler, an attorney at the firm, researched Plaintiffs'
22 remedies theories. Staff attorney Nikul Shah reviewed thousands of documents Wells Fargo produced
23 and culled information on Plaintiffs' and class members' damages. And Eric Gibbs, the firm's founding
24 partner, contributed by advising on overall case and settlement strategy.

25 46. Uriel Chavez performs paralegal tasks at Gibbs Law Group. He is fluent in Spanish, and
26 helped by translating many calls from class members who only speak Spanish.

27 47. For Paul LLP, Richard Paul served as co-lead counsel and along with Laura Fellows,
28 performed the majority of the attorney work for Paul LLP.

1 48. Richard Paul is the founding and managing partner of Paul LLP. He is admitted to practice
2 in the Northern District of California *pro hac vice* in the present case.

3 49. Paul LLP is regularly engaged in complex commercial litigation, including both class and
4 mass actions. In the course of this practice, Mr. Paul has successfully prosecuted dozens of class actions
5 as court-appointed lead or co-lead class counsel in courts across the country. In addition, during his
6 legal career, he has both defended and prosecuted numerous cases filed against financial institutions
7 and thus brought to this case substantial experience dealing with laws and regulations affecting
8 financial institutions, as well as industry practices related to lending. *See* Paul LLP Firm Resume,
9 attached as Exhibit E.

10 50. He has successfully tried numerous cases to judges and juries in both state and federal
11 courts, and tried several cases in arbitration. In addition to trial work, he has argued over 40 cases
12 before various state and federal appellate courts. He has been repeatedly named a “Missouri/Kansas
13 Super Lawyer” and has an AV Preeminent Peer Review Rating with Martindale-Hubbell.

14 51. Pertinent to the class action trial experience he brought to this case, in 2017, he tried a class
15 action on behalf of approximately 22,000 Minnesota corn farmers as co-lead trial counsel in an MDL
16 entitled *In re Syngenta AG MIR162 Corn Litigation*, MN MDL 3785 (Hennepin County, Minn.), which
17 worked in parallel with a federal MDL with the same name, MDL 2591 (D. Kan.), where he served on
18 the Plaintiffs’ Executive Committee. During the third week of trial, the parties settled all pending cases
19 as a nationwide class action for \$1.51 billion.

20 52. In 2018, Mr. Paul represented an internet services provider in a jury trial, where he obtained
21 a defense verdict on all claims against the firm’s client, as well as a verdict in his client’s favor on its
22 counterclaims. And in 2019, Mr. Paul settled a case for a confidential 7-figure amount on the eve of
23 picking a jury.

24 53. In the instant case, his firm acted as Co-Class Counsel and worked in coordination with
25 Gibbs Law Group. Paul LLP participated in all aspects of this litigation, from the investigation phase
26 through the current settlement phase, and was fully prepared to try this case if a favorable settlement
27 could not be reached for the class.

28

1 54. His firm worked on virtually every aspect of this litigation, including: (1) preparing key
2 pleadings; (2) taking depositions of Wells Fargo employees; (3) preparing and defending class
3 members in their depositions; (4) reviewing and analyzing a significant portion of the 200,000 pages of
4 documents produced by Wells Fargo; (5) retaining and working with expert witnesses; (6)
5 communicating with counsel for Wells Fargo; and (7) conducting settlement negotiations, including
6 attending the settlement conference with Judge Ryu. At all times, he worked closely with Gibbs Law
7 Group to develop case strategies and to coordinate efforts to ensure efficient and cost-effective
8 handling of this large case.

9 55. Laura Fellows has practiced law since 2013 and is a member of the Arkansas, Kansas, and
10 Missouri State Bars. She is admitted to practice in the Northern District of California *pro hac vice* in
11 the present case. Ms. Fellows joined Paul LLP in 2018. In this case, Ms. Fellows was primarily
12 responsible for legal research and writing, reviewing and analyzing Wells Fargo's substantial document
13 productions, taking and assisting with preparations for depositions of Wells Fargo executives, and
14 defending Plaintiff depositions.

15 56. While Mr. Paul and Ms. Fellows handled most of the work on this case, other Paul LLP
16 attorneys made important contributions. Partner Ashlea Schwarz helped with the initial investigation
17 and analysis of the case, negotiated the ESI protocol and developed key search terms, prepared for the
18 corporate representative deposition, and provided valuable wisdom regarding discovery strategy.
19 Associate Nick Leyh reviewed and analyzed documents, prepared and defended a class member
20 deposition, and conducted legal research related to mortgage servicing and lender obligations.
21 Associate George Brand also helped review and analyze documents and assisted with research in
22 support of the motions for preliminary and final approval.

23 57. Kendra John is the office manager at Paul LLP and also performs paralegal tasks. Ms. John
24 helped with discovery by reviewing Wells Fargo's document productions and working with our
25 document management vendor to manage the productions. Patrick Neal is a paralegal at Paul LLP. Mr.
26 Neal worked on discovery, including helping prepare Plaintiffs' documents for production and
27 discovery responses. He also worked to organize and categorize documents once reviewed by attorneys.
28 Linda Davis was a paralegal at Paul LLP, and she assisted with reviewing the named Plaintiffs' loan

1 files and preparing documents for the depositions of the named plaintiffs. Ms. Davis also assisted with
 2 reviewing bankruptcy records for the named Plaintiffs. Jordan Cowger was a summer law clerk at Paul
 3 LLP and just finished her first year of law school. Ms. Cowger also assisted with document review,
 4 including reviewing the named Plaintiffs' loan files and preparing relevant documents needed for
 5 deposition preparation.

6 **C. Hourly Rates**

7 58. The normal billing rate applied for each attorney during the relevant period is set forth in the
 8 table below.

9 **Primary Attorneys**

10 Timekeeper	10 Hourly Rate
11 Michael Schrag	\$800
12 Richard Paul	\$725
13 Josh Bloomfield	\$580
14 Linda Lam	\$465
15 Laura Fellows	\$425

17 **Other Attorneys and Litigation Staff**

18 Timekeeper	18 Hourly Rate
19 Aaron Blumenthal	\$430
20 Andre Mura	\$720
21 Ashlea Schwarz	\$575
22 Craig Rosler	\$680
23 Eric Gibbs	\$910
24 Geoffrey Munroe	\$720
25 George Brand	\$275
26 Jeff Kosbie	\$415
27 Jordan Cowger	\$85
28 Kendra John	\$250

Linda Davis	\$240
Nick Leyh	\$275
Nikul Shah	\$415
Pat Neal	\$230
Uriel Chavez	\$280

59. The hourly rates used to calculate Class Counsel's lodestar range from \$575 to \$910 for partners, \$275 to \$580 for associates, \$275 to \$415 for staff attorneys, and \$85 to \$280 for law clerks, paralegals, and litigation support staff.

60. Gibbs Law Group LLP is located in Oakland, California, but performs work across the country. Based on his general knowledge of rates in the Bay Area as well as nationwide work on those complex class actions, Mr. Schrag believes the rates charged by Gibbs Law Group are in line with those prevailing in the legal community for similar services by lawyers of comparable skill and reputation.

61. Paul LLP is located in the Kansas City, Missouri area but performs work across the country. Based on his general knowledge of the rates charged by Kansas City firms for nationwide work handling complex class actions, Mr. Paul believe the rates charged by Paul LLP are in line with those prevailing in the legal community for similar services by lawyers of comparable skill and reputation.

62. Moreover, Class Counsel's hourly rates are also regularly evaluated by courts in California and across the country and have been consistently approved as reasonable in recent years. *See In re Lenovo Adware Litig.*, No. 15-md-02624, Dkt. 258 (N.D. Cal. Apr. 24, 2019) (approving hourly billing rates for Gibbs Law Group); *In re Hyundai Sonata Engine Litig.*, No. 15-cv-01685, Dkt. 85 (N.D. Cal. Jan 23, 2017) (Gibbs); *In re: Vizio, Inc., Consumer Privacy Litig.*, No. 16-ml-02693, Dkt. 337 (C.D. Cal. July 31, 2019) (Gibbs); *Audino v. JPMorgan Chase Bank*, No. 16-cv-00631, Dkt. 101 (S.D. Iowa Nov. 14, 2018) (Paul); *In re: Syngenta AG MIR 162 Corn Litigation*, 14-md-2591, Dkt. 4128 (D. Kan. March 20, 2019) (Paul).

D. Time Spent By Project

63. From the inception of this case to June 1, 2020, Class Counsel has devoted over 6,877 hours to this case, and their lodestar using their typical hourly billing rates is \$3,758,689.

1 64. This lodestar reflects less than the total number of hours billed during the case, as both firms
2 exercised billing discretion and voluntarily reduced their time before filing this motion as further
3 described herein. In total, Class Counsel cut 2,675 hours from their contemporaneously recorded time.

4 65. Attached as Exhibit A is a listing of time entries from both of our firms that breaks down
5 our work into 93 specific projects. These time entries are presented chronologically and show a detailed
6 description of our work performed. Each entry includes the date, hours expended, attorney name, and
7 the tasks undertaken. The time reported in Exhibit A does not include the hours Class Counsel spent on
8 the final approval and fee application papers over the past week.

9 **III. Billing Judgment**

10 66. Class Counsel exercised reasonable billing judgment in preparing our lodestar information.
11 We reviewed each of our firms' time entries and specifically determined if each entry was excessive,
12 redundant, or unnecessary.

13 67. We cut any entry for tasks that seemed unnecessary. For example, we did not include any
14 time Class Counsel spent briefing the first motion for class certification or working with John
15 Kilpatrick, the expert Class Counsel retained in connection with the first class certification motion (who
16 ultimately did not submit a report on the second motion). We also completely eliminated any time spent
17 drafting discovery requests we did not serve or preparing for depositions that were cancelled because
18 the case settled. Class Counsel also eliminated time spent representing individual class members in
19 mediations with Wells Fargo (whether or not the class member ultimately settled after mediating).

20 68. We also reviewed and deleted attorney entries that appeared to be administrative in nature,
21 such as time spent preparing Plaintiffs' documents for production, corresponding with Wells Fargo's
22 counsel to set up depositions, working with the online platform that housed Wells Fargo's document
23 production for Class Counsel's review, as well as time entries for additional attorneys getting up to
24 speed on the case.

25 69. Class Counsel received hundreds of telephone calls and e-mails from borrowers across the
26 country who said that Wells Fargo denied them a loan modification. Responding to these inquiries took
27 substantial time over a span of several months, but we eliminated more than half of this time from the
28

1 billing we are submitting because while many of those inquiries were from class members, many others
2 were from borrowers who did not end up being included in the settlement class.

3 70. We are mindful of this Court's guidance that ordinarily, no more than one attorney and one
4 paralegal need be present at a deposition and no more than one attorney need attend a law-and-motion
5 hearing, but that the fee award will account for the opposing party's staffing to allow for symmetry. We
6 tried to restrict our billing to meet this guidance and to conserve resources. For the seven depositions of
7 Wells Fargo employees, the deposition transcripts revealed that we staffed with one fewer attorney than
8 Wells Fargo at each deposition.³ Similarly, for the four expert witness depositions, we also had one
9 fewer attorney, except for the deposition of Plaintiffs' banking expert. We staffed equally or with fewer
10 attorneys than Wells Fargo for the depositions of the named Plaintiffs and the California class
11 members.⁴ For the few depositions where our staffing exceeded that of Wells Fargo, we exercised
12 billing judgment and did not request fees for the excessive staffing. One exception is that for the first
13 deposition of a named Plaintiff (Debora Granja), we worked together as a team to learn Wells Fargo's
14 approach to these depositions and develop a streamlined strategy for the remaining named Plaintiff
15 depositions. For this reason, our lodestar on the Granja deposition is higher than that for other named
16 Plaintiff or class representative depositions.

17 71. For the law-and-motion hearings, the nature of the case supported more than one attorney
18 attendance on most occasions, and this staffing was similar to Wells Fargo's. For most hearings, we
19 billed for one or both of Mr. Schrag and Mr. Paul's attendance, as well as one associate.

20 72. For meet and confer calls and meetings with Wells Fargo's counsel, we mostly limited
21 billing to one partner and one associate during each call or meeting. Our billing on these calls and
22 meetings is commensurate with Wells Fargo's staffing.

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27 ³ Specifically, Wells Fargo brought one partner and one associate to six of the defendant depositions
28 and three partners to one of those depositions. Class Counsel took six of those depositions with only
one attorney. For the remaining deposition, the 30(b)(6) deposition of Carmen Bell, the two
undersigned attorneys appeared.

⁴ For most of these Plaintiff depositions, we tried to bring one attorney, typically an associate only.

73. Finally, each firm eliminated billing from any attorney who spent fewer than 10 hours in the case.⁵ While these attorneys helped with staffing and important advice during busy and key times during the litigation, their time has been eliminated from every project they worked on and they do not appear on the below list of timekeepers.

74. In total, we deducted 2,675 hours and a lodestar of \$1.4 million from our total billing. The chart below summarizes the total number of hours deleted for each timekeeper.

Timekeeper	Total Hours Removed	Rate	Total Lodestar Deducted
Michael Schrag	328.2	\$800	\$262,560.00
Rick Paul	166.9	\$725	\$121,002.50
Joshua Bloomfield	647.6	\$580	\$375,608.00
Linda Lam	386.9	\$465	\$179,908.50
Laura Fellows	301.1	\$425	\$127,967.50
Aaron Blumenthal	56.1	\$430	\$24,123.00
Andre Mura	37.4	\$720	\$26,928.00
Ashlea Schwarz	40.3	\$575	\$23,172.50
Craig Rosler	5.8	\$680	\$3,944.00
Eric Gibbs	23.7	\$910	\$21,567.00
Geoffrey Munroe	47.3	\$720	\$34,056.00
George Brand	9.6	\$275	\$2,640.00
Jeff Kosbie	0.2	\$415	\$83.00
Jordan Cowger	1.8	\$85	\$153.00
Kendra John	1.8	\$250	\$450.00
Linda Davis	23	\$240	\$5,520.00
Nick Leyh	163.9	\$275	\$45,072.50
Nikul Shah	184.7	\$415	\$76,650.50
Pat Neal	57.8	\$230	\$13,294.00
Uriel Chavez	10.2	\$280	\$2,856.00

75. The table below provides a project-by-project total of the hours billed and subsequently deducted pursuant to our exercise of billing judgment.

⁵ We also eliminated from our lodestar work done by two other firms under our direction on limited projects. We asked Wessler Gupta, appellate specialists, to assist us with the Rule 23(f) petition earlier this year; and, in 2019, Keller Rohrback did a small amount of work on Wells Fargo & Company's motion to dismiss. As part of our billing judgment, Class Counsel is not submitting either firm's time as part of the total lodestar but will pay those firms for their work from the fee the Court awards.

Project	Total Hours Recorded	Hours Deducted Pursuant to Billing Judgment	Percentage Awardable
Projects cut in their entirety: briefing on first class certification motion, work with expert John Kilpatrick, response to Wells Fargo's motion for attorney's fees, new attorneys reviewing background on the case, and other miscellaneous tasks	1750	1750	0%
Case investigation	47	7.5	84%
Original complaint	84.1	16.6	80%
Advise class members on apology letters and mediation	207	42.7	79%
Responding to inquiries from potentially affected borrowers	600.33	323.4	46%
Order to show cause	79	8.2	90%
Corrective letters to class members stemming from order to show cause	25.6	3.5	86%
First amended complaint	369.7	24.2	93%
Motion to transfer venue	124.4	9.4	92%
Response to motion to dismiss original complaint	10.1	1.6	84%
Rule 26 initial disclosures	61.5	8.2	87%
Rule 26(f) report and case management conference	99.7	24.7	75%
FOIA request to OCC	9.2	0.8	91%
Discovery – Plaintiffs' requests	96.35	16.5	83%
Discovery – Plaintiffs' responses	243.3	43.5	82%
Discovery – Meet and confer with Wells Fargo on discovery responses	108.7	21	81%
Document review	832.36	55.1	93%
Opp. to motion to dismiss first amended complaint	289.9	15.8	95%
Rule 30(b)(6) deposition notice	29.2	1.6	95%
Communicate with class members and named Plaintiffs	87.1	20.3	77%
Opp. to Wells Fargo & Company's motion to dismiss	57.4	1.9	97%
Named plaintiff depositions (general)	24.5		100%
California class member depositions (general)	25	0.3	99%
Deposition of Granja	89.8	25.7	71%
Deposition of Hernandez	29.7	2.8	91%
Deposition of White	33.9	7.2	79%
Deposition of Frye	35.8	4.7	87%
Deposition of Simoneaux	27.3	5.1	81%
Deposition of Trevino	30	2.8	91%

1	Deposition of DeMartino	25.8	0.5	98%
2	Deposition of Wilson	25	2.5	90%
3	Deposition of Teague	25.5	3.2	87%
4	Deposition of Hood	17.5		100%
5	Deposition of Floyds	25.9	0.7	97%
6	Deposition of Lindner	17.2	1.7	90%
7	Motion to compel/Wells Fargo's motion for protective order on Rule 30(b)(6) topics (July 2019 hearing)	70	3.5	95%
8	Robert Ferguson 30(b)(6) deposition	49.7	2.7	95%
9	Carmen Bell 30(b)(6) deposition	157.94	20.4	87%
10	Diane Young deposition	52.2	2.2	96%
11	Beena Menon deposition	44.76	4.5	90%
12	Second amended complaint / motion for leave to amend	145.2	9.7	93%
13	Research and analyze class representatives' bankruptcies and their effect on the case	42.9	20.9	51%
14	Renewed motion for class certification	722.29	30.7	96%
15	Damages Research and Damages Expert report – Dan Salah	303.38	1.5	100%
16	Expert report – Brian Kelley	99.7		100%
17	Deposition of Dan Pfeil	17.52		100%
18	Deposition of Susan Crawford	16		100%
19	Motion for leave to file third amended complaint	48.4	1.1	98%
20	Deposition of Kara Reimers	34.6		100%
21	Deposition of Craig Enis	11.7		100%
22	Deposition of Sandra Campos	32.4		100%
23	Deposition of Jameel Hayden	23.7		100%
24	Deposition of Derrick Cannon	26.4		100%
25	Deposition of Charles Gomez	7.9		100%
26	Deposition of Cathaline Gonzalez	6.2		100%
27	Deposition of Jerry de la Cruz	10.4		100%
28	Deposition of Martha Montenegro	16.1		100%
	Deposition of Jose Chavez	14.3		100%
	Deposition of Kimberly Gladman	22.6	0.7	97%
	Deposition of Anna Schulke	50.7	0.1	100%
	Deposition of Jason Hewitt	16.3		100%
	Deposition of Joe Plescia	14.3		100%
	Deposition of Elizabeth Messana	10.5	0.5	95%
	Deposition of Hortensia Torres	21.4	1.5	93%
	Deposition of Dino Paris	8.7	1	89%
	Deposition of Alfonso Campos	10.2		100%
	Deposition of Cedillos	4.9		100%

1	Motion to compel various discovery responses (Feb. 2020 hearing)	33.9		100%
2	Deposition of Wells Fargo Expert Peter Ross	62.9	4.9	92%
3	Response to Coordes plaintiffs' motion to consolidate	40.8	9.4	77%
4	Deposition of Wells Fargo Expert Christopher James	20.75		100%
5	Defending Salah deposition and responding to Salah subpoena	19.5		100%
6	Defending Kelley deposition and responding to Kelley subpoena	44.6		100%
7	Third amended complaint	18.3	3.9	79%
8	Motion for approval of litigation class notice plan	78	6.5	92%
9	Meet and confer on cap sheet / notice Rule 30(b)(1) cap sheet deposition	40.69	4.8	88%
10	Response to Rule 23(f) petition	28.7	0.7	98%
11	Class damages analysis (post class cert order)	16.1	1.1	93%
12	Settlement conference with Judge Ryu	155.37	7.5	95%
13	Opp. to Wells Fargo's motion for partial summary judgment	131.8		100%
14	Opp. to Wells Fargo's motion to stay pending Rule 23(f) petition	33.5	2.3	93%
15	Settlement agreement	184.2	6.6	96%
16	Opp. to motion to sever	27.9	9.6	66%
17	Motion for preliminary approval	402.4	12.1	97%
18	Calls with class members about the settlement	120.2	6.1	95%
19	Motion for final approval and attorney's fees and costs	134.4	3	98%
20	ESI protocol/protective order	11.2		100%
21	Trial prep	16.6	2	88%
22	Trial prep-exhibit list	52.8	5.2	90%
23	Trial prep-evidence admissibility	9.1		100%
24	Motion for permission to communicate with CA class members before depositions and clarification re absent class member discovery (Dec. 9, 2019 hearing)	33.3	4.8	86%
25	Settlement administration	28.9		100%
26	Miscellaneous/Notice of Pendency of Other Actions	33.17	13.6	59%

1 **IV. Expenses**

2 76. The attached Exhibit C details Class Counsel’s costs, broken down by category. These
3 expenditures were necessary to Class Counsel’s prosecution of the action. The costs are particularly
4 reasonable in light of the fact that this action required expert opinions and robust discovery, with Class
5 Counsel taking or defending 46 depositions across eight different states. *See* Exh. B. Such costs are
6 routinely awarded in contingency fee cases. The notice informed class members that Class Counsel
7 would seek up to \$335,000 in litigation expenses. (Dkt. 276-2 at p. 1, § 17.) The total costs slightly
8 exceeded this amount. Exh. C. Class Counsel request reimbursement of \$335,000 for their out-of-
9 pocket costs.

10 77. For any meal where alcohol might have been ordered, the reported expenses reflect a
11 20% reduction on the total bill for the meal.

12 78. Class Counsel advanced travel and lodging costs for the named Plaintiffs for their
13 depositions (which were mostly held in San Francisco). The reported expenses show those airfare and
14 lodging costs, as well as a per diem of \$75 per travel day for each named Plaintiff’s meals.

15 79. While Class Counsel will not ask the Court to award service awards, we note that class
16 representatives Debora Granja and Sandra Campos expended significant time and effort for the benefit
17 of the class. Both participated in discovery, searched for and produced all their relevant documents,
18 appeared for their depositions, and traveled to San Francisco from Oregon and Southern California,
19 respectively, to attend the settlement conference with Judge Ryu. Class Counsel greatly appreciates
20 their service.

21 **V. Final Lodestar**

22 80. Class Counsel requests a fee of \$4,525,000, which is 25% of the *net* settlement amount, *i.e.*
23 \$18.1 million (\$18.5 million minus \$400,000 in litigation and administration expenses). This fee
24 request represents a 1.2 multiplier of the present lodestar.

25 81. The multiplier will effectively decrease as Class Counsel continue to devote additional time
26 toward settlement approval, settlement administration, and class member inquiries in the coming
27 months.

28

82. Class Counsel received \$38,800 in attorney's fees for representing seven borrowers in mediations with Wells Fargo as part of the bank's remediation program. Again, we eliminated time from this work from our lodestar. We have not received any other compensation in connection with this matter.

83. For both firms, below is a summary chart of total time and fees sought for each timekeeper, post billing judgment.

Timekeeper	Firm	Hourly Rate	Total Hours Billed	Total Amount
Michael Schrag	Gibbs Law Group LLP	\$800	1009	\$807,200.00
Rick Paul	Paul LLP	\$725	637	\$461,825.00
Joshua Bloomfield	Gibbs Law Group LLP	\$580	993.4	\$576,172.00
Linda Lam	Gibbs Law Group LLP	\$465	1226.1	\$570,136.50
Laura Fellows	Paul LLP	\$425	1213.8	\$515,865.00
Aaron Blumenthal	Gibbs Law Group LLP	\$430	98.2	\$42,226.00
Andre Mura	Gibbs Law Group LLP	\$720	5.2	\$3,744.00
Ashlea Schwarz	Paul LLP	\$575	117.9	\$67,792.50
Craig Rosler	Gibbs Law Group LLP	\$680	159.9	\$108,732.00
Eric Gibbs	Gibbs Law Group LLP	\$910	19.5	\$17,745.00
Geoffrey Munroe	Gibbs Law Group LLP	\$720	385.4	\$277,488.00
George Brand	Paul LLP	\$275	200.6	\$55,165.00
Jeff Kosbie	Gibbs Law Group LLP	\$415	16.6	\$6,889.00
Jordan Cowger	Paul LLP	\$85	55.1	\$4,683.50
Kendra John	Paul LLP	\$250	21.7	\$5,425.00
Linda Davis	Paul LLP	\$240	13.4	\$3,216.00
Nick Leyh	Paul LLP	\$275	198	\$54,450.00
Nikul Shah	Gibbs Law Group LLP	\$415	341.1	\$141,556.50
Pat Neal	Paul LLP	\$230	157	\$36,110.00
Uriel Chavez	Gibbs Law Group LLP	\$280	8.1	\$2,268.00
		Total	6877	\$3,758,689.00

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 and correct to the best of my knowledge.

3 Executed on June 8, 2020 in Oakland, California.

4
5 /s/ Michael Schrag
6 Michael Schrag

7 I declare under penalty of perjury under the laws of the United States that the foregoing is true
8 and correct to the best of my knowledge.

9 Executed on June 8, 2020 in Kansas City, Missouri.

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11 /s/ Richard M. Paul III
12 Richard M. Paul III

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EXHIBIT A

**EXHIBIT A TO JOINT DECLARATION OF MICHAEL SCHRAG AND RICHARD PAUL
PROJECT-BASED TIME ENTRIES**

Project: Case investigation					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-08-05	AB	Perform factual research concerning which individuals who were denied mortgage modifications may have been affected by the wrongful practice that Wells Fargo recently disclosed in its 10-Q report.	1.4	\$430	\$ 602.00
2018-08-07	AB	Call with potential client concerning his father who lost his home after being denied a mortgage modification by Wells Fargo.	0.8	\$430	\$ 344.00
2018-10-18	AMM	Confer with A. Blumenthal re potential Wells Fargo case	0.2	\$720	\$ 144.00
2018-10-26	AMM	Confer with D. Hughes re potential Wells Fargo suit	0.2	\$720	\$ 144.00
2018-10-29	AB	Draft summary of the facts of the potential case for D. Hughes.	0.7	\$430	\$ 301.00
2018-10-29	AB	Speak with R. Paul concerning how to evaluate and get relief for people affected by Wells Fargo's "glitch."	0.9	\$430	\$ 387.00
2018-10-31	RMP	Investigate potential claims	0.2	\$725	\$ 145.00
2018-10-31	AGS	Case investigation; review potential plaintiff documents; begin case analysis memorandum	3.5	\$575	\$ 2,012.50
2018-11-01	RMP	Analyze potential claims	0.1	\$725	\$ 72.50
2018-11-02	RMP	Correspondence with potential clients	0.1	\$725	\$ 72.50
2018-11-02	AGS	Draft questions to potential clients for further investigation	0.4	\$575	\$ 230.00
2018-11-05	RMP	Investigate potential claims	0.2	\$725	\$ 145.00
2018-11-06	AGS	Call with Michael Schrag regarding potential client facts	0.3	\$575	\$ 172.50
2018-11-06	RMP	Analyze potential class action	0.3	\$725	\$ 217.50
2018-11-06	LPL	Call with A. Blumenthal, M. Schrag, and co-counsel re: facts and potential theories of the case	0.5	\$465	\$ 232.50

2018-11-06	MLS	Review news articles and emails re clients; tel. call L. Lam, R. Paul and A. Schwarz re theories; conf. A.Blumenthal and D. Hughes re same; tel. call potential client re his father's potential case	2.2	\$800	\$ 1,760.00
2018-11-07	MLS	Factual research re Wells Fargo home loan mod	0.3	\$800	\$ 240.00
2018-11-11	RMP	Analyze potential claims	0.1	\$725	\$ 72.50
2018-11-20	RMP	Investigate potential claims	0.3	\$725	\$ 217.50
2018-11-28	AGS	Follow up on potential plaintiff	0.1	\$575	\$ 57.50
2018-11-28	RPN	Call with client about potential case; email with attorney about case details	0.4	\$230	\$ 92.00
2018-11-28	MLS	Review Wells Fargo Loan mod client files; discuss client issues w/ A. Blumenthal	1.2	\$800	\$ 960.00
2018-11-30	AB	Correspond with co-counsel concerning Wells Fargo's legal obligations under Home Affordable Modification Program (HAMP).	0.6	\$430	\$ 258.00
2018-12-03	AB	Perform factual research into why Wells Fargo expanded its estimate into the number of people affected by the calculation error(s).	1.6	\$430	\$ 688.00
2018-12-03	AB	Review documents received from potential class member who was impacted by the Wells Fargo loan modification errors.	1.7	\$430	\$ 731.00
2018-12-04	RMP	Analyze potential claims	0.1	\$725	\$ 72.50
2018-12-04	RPN	Research U.S. Securities and Exchange Commission documents for admissions by Wells Fargo	0.7	\$230	\$ 161.00
2018-12-04	AB	Communicate with client concerning documents to be sent for our review.	1.1	\$430	\$ 473.00
2018-12-04	MLS	Review client docs and client emails	1.3	\$800	\$ 1,040.00
2018-12-05	RMP	Analyze potential class claims	0.6	\$725	\$ 435.00
2018-12-07	JJB	Review current client files	3.1	\$580	\$ 1,798.00
2018-12-09	RMP	Analyze legal issues in claims	1.9	\$725	\$ 1,377.50
2018-12-11	RPN	Call with potential client	0.3	\$230	\$ 69.00
2018-12-11	RMP	Investigate facts and analyze potential claims	1.5	\$725	\$ 1,087.50
2018-12-12	LCF	Outline and analyze case strategy and next steps	0.9	\$425	\$ 382.50

2018-12-12	RPN	Create client information spreadsheet; call potential clients and get details about loan modification attempt	1.1	\$230	\$ 253.00
2018-12-12	AGS	Work on case analysis and strategy; review Court's Order on pre-certification contact with putative class members	3.7	\$575	\$ 2,127.50
2018-12-20	LCF	Continue to correspond with potential class members and gather relevant facts to analyze scope of claims and the alleged "glitch," including review and draft response to correspondence from Mr. Bloomfield with list of additional questions to discuss with specific individuals related to their claims and damages	1.9	\$425	\$ 807.50
2018-12-24	RMP	Review documents from prospective client	0.2	\$725	\$ 145.00
2018-12-24	AGS	Review information and documents from potential client	0.4	\$575	\$ 230.00
2019-01-10	LCF	Analyzing specific factual questions regarding putative class members and updating team regarding Wells Fargo's hotline/intake process for others potentially affected by "glitch"	0.2	\$425	\$ 85.00
2019-01-12	LCF	Review docket reports and other filings against Wells Fargo and work on locating similar cases filed regarding "glitch," including review similar Complaints and outline thoughts regarding facts learned through the same, download and circulate same for team	1	\$425	\$ 425.00
2019-03-26	LPL	Call with M. Schrag re: GSE loans and how individuals who failed to receive a solicitation modification may or may not be in our putative class	0.4	\$465	\$ 186.00
2019-04-24	RPN	Research Wells Fargo annual meeting transcripts and annual report availability	0.8	\$230	\$ 184.00
		Project Total:	39.5		\$ 21,637.50

Project: Original complaint					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-11-05	AB	Strategize concerning filing a class vs individual actions.	0.4	\$430	\$ 172.00
2018-11-06	AB	Strategize with co-counsel concerning class vs. individual actions and what claims to plead.	0.4	\$430	\$ 172.00
2018-11-08	RMP	Draft Complaint	1	\$725	\$ 725.00
2018-11-09	AGS	Continue drafting complaint; call with Lori; call with Aaron regarding claims; communications with team regarding factual and legal sections of complaint	1.4	\$575	\$ 805.00
2018-11-12	AGS	Research current news on potential claim; communications with A. Blumenthal regarding complaint and potential clients	0.2	\$575	\$ 115.00
2018-11-12	MLS	Emails A. Blumenthal, D. Hughes re re wells fargo loan mod complaint	0.2	\$800	\$ 160.00
2018-11-12	AB	Research case law on the enforceability of HAMP through private right of action.	1.4	\$430	\$ 602.00
2018-11-12	AB	Draft facts section of the complaint.	5.8	\$430	\$ 2,494.00
2018-11-13	MLS	Work on complaint; conf. A. Blumenthal re same	1.3	\$800	\$ 1,040.00
2018-11-13	AB	Revise complaint with feedback from M. Schrag.	2.3	\$430	\$ 989.00
2018-11-14	RMP	Analyze case strategy	0.3	\$725	\$ 217.50
2018-11-14	AGS	Continue drafting complaint; call with M. Schrag and A. Blumenthal	2	\$575	\$ 1,150.00
2018-11-14	MLS	Conf. call Team re complaint; review/edit draft complaint;	2.8	\$800	\$ 2,240.00
2018-11-15	AB	Add Unfair Competition Law fraudulent prong claim to the complaint.	0.7	\$430	\$ 301.00
2018-11-15	AGS	Continue drafting complaint	0.8	\$575	\$ 460.00
2018-11-15	MLS	Legal research re complaint; review cases re contract claims	1	\$800	\$ 800.00
2018-11-16	AGS	Continue work on complaint; draft intake sheet	1	\$575	\$ 575.00
2018-11-16	RMP	Draft Complaint	1.1	\$725	\$ 797.50
2018-11-19	AGS	Work on complaint; read complaint filed in New York to obtain additional information pre-suit filed by The Dann Law Firm	0.2	\$575	\$ 115.00

2018-11-21	AB	Draft factual allegations for class action complaint against Wells Fargo.	1.4	\$430	\$ 602.00
2018-11-29	MLS	Work on complaint; tel. call A. Schwartz re research on negligence damages; review complaint and other HAMP litigation documents; meeting w A. Mura and D. Hughes re strategy and potential conflicts	2.2	\$800	\$ 1,760.00
2018-11-29	AB	Draft additional factual allegations for the class action complaint against Wells Fargo.	3.7	\$430	\$ 1,591.00
2018-11-30	MLS	Conf. A. Blumenthal and D. Hughes re complaint and strategy	0.3	\$800	\$ 240.00
2018-12-03	AB	Analyze legal issues concerning what types of damages may be available to putative class members.	1.4	\$430	\$ 602.00
2018-12-03	AB	Draft factual allegations concerning Plaintiff Alicia Hernandez.	2.3	\$430	\$ 989.00
2018-12-03	MLS	Work on complaint: legal research re claims; conf. A. Mura and D. Hughes re claims and contours of class; conf. call R. Paul and A. Schwarz re same; review client documents and discuss w/ A. Blumenthal	3.7	\$800	\$ 2,960.00
2018-12-04	JJB	Email discussions re complaint	0.2	\$580	\$ 116.00
2018-12-04	AB	Address A Mura's comments on the complaint.	0.7	\$430	\$ 301.00
2018-12-04	AB	Evaluate past cases analogous to current case to decide how to plead portions of the complaint.	0.7	\$430	\$ 301.00
2018-12-04	JJB	Review complaint	0.8	\$580	\$ 464.00
2018-12-04	AB	Add nationwide Unfair Competition Law claim to complaint, along with choice of law allegations.	1.3	\$430	\$ 559.00
2018-12-04	MLS	Legal research re negligence claims; tel. calls A Schwarz and A. Blumenthal re same; review/edit draft complaint;	3.2	\$800	\$ 2,560.00
2018-12-04	AB	Revise factual allegations in the complaint.	3.6	\$430	\$ 1,548.00
2018-12-05	JJB	Discussions with A. Blumenthal re complaint	0.2	\$580	\$ 116.00
2018-12-05	JJB	Emails with co-counsel re complaint	0.3	\$580	\$ 174.00
2018-12-05	JJB	Meeting with co-counsel re complaint	0.5	\$580	\$ 290.00

2018-12-05	AGS	Finalize complaint; communications with team; call with team regarding strategy and structure of litigation	0.8	\$575	\$ 460.00
2018-12-05	AB	Review the complaint with Plaintiff Hernandez to ensure accuracy of factual allegations.	1	\$430	\$ 430.00
2018-12-05	JJB	Review and edit complaint	1.5	\$580	\$ 870.00
2018-12-05	MLS	Work on complaint; meeting Team re strategy and causes of action;	2.8	\$800	\$ 2,240.00
2018-12-05	AB	Finalize the complaint and other case initiating documents, and file the case.	3.4	\$430	\$ 1,462.00
2018-12-05	AB	Revise factual allegations in the complaint with feedback from A Mura, D Hughes, M Schrag, and R Paul.	3.7	\$430	\$ 1,591.00
2018-12-06	RMP	Review Complaint	0.1	\$725	\$ 72.50
2018-12-07	JJB	Arrange service of complaint and summons	0.2	\$580	\$ 116.00
2018-12-07	RPN	Draft pro hac vice documents	1	\$230	\$ 230.00
2018-12-10	RPN	Draft pro hac vice	0.4	\$230	\$ 92.00
2018-12-10	RPN	Organize case management order; draft caption; organize mailing of initial filing documents to judge's chambers	0.8	\$230	\$ 184.00
2018-12-20	KDJ	Review pro hac rules and revise amended motion	0.3	\$250	\$ 75.00
2018-12-20	RPN	Draft pro hac vice documents	0.7	\$230	\$ 161.00
		Project Total:	67.5		\$ 37,086.50
Project: Advise class members on apology letters and mediation					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-10-15	AB	Speak with potential class member concerning the \$13,000 check she received from Wells Fargo and letter.	0.7	\$430	\$ 301.00
2018-10-17	AB	Strategize concerning how to advise potential class member concerning whether to cash check from Wells Fargo and if it will waive further claims.	0.8	\$430	\$ 344.00
2018-10-29	AB	Speak with potential class member concerning the \$15k check Wells Fargo sent her and how to proceed.	0.8	\$430	\$ 344.00
2018-11-19	AB	Follow up with several potential class members about relative merits of pursuing litigation vs voluntary mediation.	1.1	\$430	\$ 473.00

2018-11-19	AB	Speak with borrowers who received a letter and check from Wells Fargo concerning the software calculation error that resulted in their wrongful denial for a mortgage modification.	1.8	\$430	\$ 774.00
2018-11-20	AB	Speak with another borrower impacted by Wells Fargo's calculation error that led to wrongful denial of loan modification.	1.3	\$430	\$ 559.00
2018-11-20	AB	Speak with a borrower who received a letter and check from Wells Fargo admitting the bank had wrongfully denied a mortgage modification.	1.5	\$430	\$ 645.00
2018-11-26	AB	Speak with borrowers affected by Wells Fargo foreclosure errors.	2	\$430	\$ 860.00
2018-11-27	AB	Speak with husband of affected borrower who lost her condo due to Wells Fargo software glitch.	0.8	\$430	\$ 344.00
2018-11-27	AB	Speak to affected borrower in Nevada who lost her home due to the Wells Fargo software glitch.	1.4	\$430	\$ 602.00
2018-11-28	AB	Evaluate relative benefits to clients of mediation vs litigation.	0.6	\$430	\$ 258.00
2018-11-28	AB	Follow up with borrower who lost her dream home due to denial of a mortgage modification by Wells Fargo.	0.7	\$430	\$ 301.00
2018-11-28	AB	Speak with husband of affected borrower who lost her condo in New Jersey due to Wells Fargo's calculation errors.	1.3	\$430	\$ 559.00
2018-11-28	AB	Speak with affected borrower who lost her dream home due to Wells Fargo's software error.	1.7	\$430	\$ 731.00
2018-11-29	AB	Speak with affected borrower who lost her home because she was denied a loan modification by Wells Fargo.	0.8	\$430	\$ 344.00
2018-11-30	AB	Speak with affected borrower who would like to send us a packet of her mortgage documents to review.	0.8	\$430	\$ 344.00
2018-12-03	MLS	Tel. calls potential clients re filing class action	0.8	\$800	\$ 640.00
2018-12-05	MLS	Review client docs; tel. calls with clients	1.5	\$800	\$ 1,200.00

2018-12-06	AB	Speak with affected borrower regarding mediation session with Wells Fargo.	0.8	\$430	\$ 344.00
2018-12-07	AB	Speak with affected borrower who is in the expanded group of borrowers affected by the Wells Fargo attorneys' fee calculation errors.	1.3	\$430	\$ 559.00
2018-12-10	MLS	Client calls to gather facts and answer questions about case	1.5	\$800	\$ 1,200.00
2018-12-10	JJB	Review current client files	1.6	\$580	\$ 928.00
2018-12-10	AB	Speak with borrowers affected by Wells Fargo's wrongful denial of loan modifications.	2.5	\$430	\$ 1,075.00
2018-12-11	JJB	Call with M. Schrag and A. Blumenthal	0.3	\$580	\$ 174.00
2018-12-11	AB	Speak with borrowers affected by Wells Fargo's wrongful denial of loan modifications; speak with M. Schrag and J. Bloomfield re same.	1.2	\$430	\$ 516.00
2018-12-11	JJB	Review current client files	1.6	\$580	\$ 928.00
2018-12-11	MLS	Discussions with various clients and potential clients re legal claims and options; follow up call A. Blumenthal and J. Bloomfield re same	1.7	\$800	\$ 1,360.00
2018-12-12	AB	Work with J Bloomfield to ensure that borrowers who have contacted us to find out if they were affected by the software glitch will have their claims evaluated.	0.4	\$430	\$ 172.00
2018-12-12	AB	Review documents received from client regarding her wrongful denial of a modification.	1.8	\$430	\$ 774.00
2018-12-13	AB	Speak with woman whose mother was wrongfully foreclosed on by Wells Fargo and received a letter and check.	0.7	\$430	\$ 301.00
2018-12-13	AB	Review documents received from client concerning the wrongful denial of loan modification.	1.5	\$430	\$ 645.00
2018-12-13	JJB	Review client documents	2	\$580	\$ 1,160.00
2018-12-14	AB	Speak with client concerning the status of her mediation.	0.4	\$430	\$ 172.00
2018-12-14	AGS	Call with client to determine mediation or class action as best avenue; continued analysis of damage issues	1.1	\$575	\$ 632.50

2018-12-15	AB	Evaluate for affected borrower whether signing Wells Fargo's mediation agreement will waive her claims.	1.2	\$430	\$ 516.00
2018-12-16	AB	Evaluate for affected borrower whether signing Wells Fargo's mediation agreement will waive her claims.	0.5	\$430	\$ 215.00
2018-12-17	AB	Evaluate for affected borrower whether signing Wells Fargo's mediation agreement will waive her claims.	0.3	\$430	\$ 129.00
2018-12-18	AB	Correspond with client to gather further details concerning her story.	0.6	\$430	\$ 258.00
2018-12-18	MLS	Tel. calls and emails with clients to discuss their facts and potential strategies	0.7	\$800	\$ 560.00
2018-12-18	AB	Speak with daughter of borrower who lost her home due to Wells Fargo calculation error and resulting denial of modification.	0.8	\$430	\$ 344.00
2018-12-19	JJB	Call with JAMS re mediations	0.4	\$580	\$ 232.00
2018-12-19	JJB	Emails with co-counsel re client issues	0.7	\$580	\$ 406.00
2018-12-19	MLS	Tel calls and emails with potential clients;tel. call JAMS re mediations; conf. J. Bloomfield and L. Lam re calls with potential clients; conf. D. Hughes re responding to potential client vms.	2	\$800	\$ 1,600.00
2018-12-20	AGS	Follow up with potential clients seeking representation through class and/or mediation; strategy regarding January 2 meeting with defense counsel	0.5	\$575	\$ 287.50
2018-12-20	AB	Gather additional facts from client concerning her potential damages.	0.8	\$430	\$ 344.00
2018-12-20	JJB	Draft letter to A. Groves re mediation	0.8	\$580	\$ 464.00
2018-12-20	JJB	Review client files	1.7	\$580	\$ 986.00
2018-12-20	MLS	Draft letter to def. counsel re mediation deadline and document request; email Team re same and agenda for conf. call; review /edit email to potential clients; phone calls and emails to potential clients; emails	2.5	\$800	\$ 2,000.00

2018-12-21	LCF	Outline next steps with co-counsel, including how to proceed in light of Court's Order prohibiting communications with putative class members and Wells Fargo's ongoing mediations	0.7	\$425	\$ 297.50
2018-12-21	MLS	Conf. call Team re research tasks and client update; work on letters to defense counsel (re postponing mediations) and potential clients; conf. D. Hughes, J.Bloomfield re same; tel. call Def. counsel re same;	2.8	\$800	\$ 2,240.00
2018-12-22	AGS	Review information on individual clients and whether they want to mediate or participate in the class	0.2	\$575	\$ 115.00
2018-12-27	JJB	Review client files	2.8	\$580	\$ 1,624.00
2018-12-28	JJB	Review client files	1.2	\$580	\$ 696.00
2019-01-03	AB	Speak with potential class members concerning the court's ruling with relation to being represented in mediation.	1.2	\$430	\$ 516.00
2019-01-04	GAM	Review hearing transcript and emails with team re same, including what to tell class members who contact us	0.6	\$720	\$ 432.00
2019-01-04	JJB	Call with co-counsel re clients and mediations	1	\$580	\$ 580.00
2019-01-04	MLS	Conf. call Tam re client issues, mediations, court hearing; emails re same; conf. L. Lam and J. Bloomfield re client issues; review transcript OSC hearing; emails from G. Munroe re claims	2.7	\$800	\$ 2,160.00
2019-01-04	JJB	Review client documents	2.7	\$580	\$ 1,566.00
2019-01-05	LCF	Continue to analyze strategy and next steps with respect to mediation and advising clients/putative class members regarding the same, including Review Judge Alsup's Order from Hearing on Show Cause Order to confirm strategy follows same, outline draft talking points to potentially advise putative class members, circulate same for further edits/review	1	\$425	\$ 425.00

2019-01-07	LCF	Continue to analyze potential next steps in light of transcript from Show Cause Hearing, including revise draft of potential options and circulate the same for further analysis; review status of receiving documents from clients	0.5	\$425	\$ 212.50
2019-01-07	MLS	Tel. calls and emails G. Munroe, E. Gibbs and R. Paul re client communications and mediations	0.8	\$800	\$ 640.00
2019-01-07	RMP	Analyze outline for phone calls with class members about mediation	0.8	\$725	\$ 580.00
2019-01-07	JJB	Review client documents	2.3	\$580	\$ 1,334.00
2019-01-08	GAM	Call with team re class member calls and information to provide re mediation and options	0.6	\$720	\$ 432.00
2019-01-08	JJB	Call with co-counsel re clients and mediations	0.6	\$580	\$ 348.00
2019-01-08	JJB	Review client documents	3.1	\$580	\$ 1,798.00
2019-01-09	JJB	Review client documents	1.4	\$580	\$ 812.00
2019-01-10	JJB	Review client documents	2.2	\$580	\$ 1,276.00
2019-01-11	LCF	Continue corresponding with putative class members regarding their experiences with Wells Fargo, including difficulties encountered in attempting to refinance home, outlining information learned through the same	0.2	\$425	\$ 85.00
2019-01-11	JJB	Review client documents	2.6	\$580	\$ 1,508.00
2019-01-12	RMP	Work on script for calls with potential clients	0.2	\$725	\$ 145.00
2019-01-12	LCF	Work on revising draft talking points for anticipated phone calls from putative class members in response to curative letter from Wells Fargo as ordered by the Court; circulate the same	0.4	\$425	\$ 170.00
2019-01-14	LCF	Corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outline facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error	4	\$425	\$ 1,700.00

2019-01-15	LCF	Continue corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outline facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error; updating team regarding the same	4.8	\$425	\$ 2,040.00
2019-01-16	LCF	Corresponding with co-counsel regarding status of contact with clients and potential clients, outlining and sharing facts learned through correspondence, analyzing next steps for document collection	0.5	\$425	\$ 212.50
2019-01-16	RMP	Work on strategy and outline for responding to inquiries from class members	0.5	\$725	\$ 362.50
2019-01-16	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outline facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error; updating team regarding the same	5.3	\$425	\$ 2,252.50
2019-01-17	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outlining facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error; updating team regarding the same	7.4	\$425	\$ 3,145.00
2019-01-18	RMP	Conference call regarding case strategy and correspondence with clients	0.6	\$725	\$ 435.00

2019-01-18	MLS	Tel. calls and emails to clients; conf. call Team re client status, mediation issues; document preservation and collection; transfer motion	2	\$800	\$ 1,600.00
2019-01-18	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outlining facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error; updating team regarding the same	3.9	\$425	\$ 1,657.50
2019-01-18	LPL	E-mails and calls with class members who are calling in response to WF's latest letter; log and organize data on calls and e-mails from class members over the past few days	5.8	\$465	\$ 2,697.00
2019-01-22	RMP	Review correspondence with prospective clients; review document preservation letter to clients	0.4	\$725	\$ 290.00
2019-01-22	LCF	Outlining and analyzing thoughts regarding representation of three potential plaintiffs with issues regarding divorce, estates, and illness; drafting questions and thoughts for analysis and further follow-up	0.5	\$425	\$ 212.50
2019-01-22	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outlining facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error; updating team regarding the same	4.5	\$425	\$ 1,912.50

2019-01-23	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including outlining facts learned regarding Wells Fargo prior "mediations," scope of alleged error, and damages suffered by putative class members in light of error	1.3	\$425	\$ 552.50
2019-01-24	LCF	Continue to correspond with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including analyzing specific issues regarding representation where borrower may have limited capacity, continuing to gather documents and information regarding facts of potential claims	0.5	\$425	\$ 212.50
2019-01-24	AB	Respond to question from named plaintiff concerning effect of lawsuit on her credit.	0.6	\$430	\$ 258.00
2019-01-24	MLS	Emails and tel. calls clients re mediations; conf. call Team re same	1.5	\$800	\$ 1,200.00
2019-01-25	UC	Client Call (Spanish Speaker)	1.1	\$280	\$ 308.00
2019-01-25	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including analyzing specific issues regarding potential representation at mediation and continuing to gather documents and information regarding facts of potential claims	1.6	\$425	\$ 680.00
2019-01-25	MLS	Phone calls and emails with clients re mediation issues; meeting with Team re same; tel. call R. Paul re same; review A. Groves meet/confer email	2.7	\$800	\$ 2,160.00
2019-01-25	LPL	Calls with class members / prospective clients re: background on our case and their options with respect to mediation and litigation	3.4	\$465	\$ 1,581.00

2019-01-27	LPL	E-mail to M. Schrag and J. Bloomfield re: status on determining whether clients and prospective clients wish to submit mediation request forms	0.2	\$465	\$ 93.00
2019-01-29	LCF	Continuing corresponding with putative class members who received supplemental letter from Wells Fargo pursuant to Judge Alsup's Order, including analyzing specific issues regarding potential representation at mediation and continuing to gather documents and information regarding facts of potential claims	1.5	\$425	\$ 637.50
2019-01-29	UC	Vinicio Vera (Call & Mediation paperwork review) Spanish speaker	1.9	\$280	\$ 532.00
2019-01-31	MLS	Emails and tel. calls w/ clients re mediations and gathering facts	0.8	\$800	\$ 640.00
2019-02-04	RMP	Review letter from Wells Fargo to client regarding mediation; review correspondence from potential clients	0.2	\$725	\$ 145.00
2019-02-04	MLS	Tel. calls and emails w potential clients and attorneys; review WF letters not compliant with court order	1.5	\$800	\$ 1,200.00
2019-02-05	MLS	Tel. calls emails re clients; revise stip re extension of time; draft email to team re mediations; tel. call A. Groves re FAC deadline stip, letters going to clients and client loan files	1.8	\$800	\$ 1,440.00
2019-02-11	MLS	Tel call and emails re client issues; review Lawson documents and email re same	2	\$800	\$ 1,600.00
2019-02-12	LCF	Correspond with potential plaintiff, Ms. Botz, to gather facts regarding potential claim and outline potential next steps and options	0.2	\$425	\$ 85.00
2019-02-12	LPL	Call with class member Pam Gassaway re: background on the case and what her options are	0.5	\$465	\$ 232.50
2019-02-13	LPL	Call with potential client and class member Rich Shipley re: how his mediation went and whether he now wants to become a client	0.4	\$465	\$ 186.00

2019-02-13	LCF	Correspond with Ms. Johnson and Ms. Lewis regarding facts of potential claims and status of matter; follow-up correspondence with them regarding next steps; outline facts learned through correspondence	0.7	\$425	\$ 297.50
2019-02-19	LPL	Call with client Mark Gomez re: his negative credit reporting from the WF error; e-mails with team re: same	0.3	\$465	\$ 139.50
2019-02-25	MLS	Emails re client contacts	0.5	\$800	\$ 400.00
2019-03-04	LPL	Call with class member Deborah Colon re: background on the case; send her a representation agreement	0.6	\$465	\$ 279.00
2019-03-05	LCF	Review correspondence from class member, Mr. Morgenthal, regarding next steps and draft response to the same	0.2	\$425	\$ 85.00
2019-03-05	LPL	Call back to class member Lisa Cobren re: background on the case and what her options are with respect to mediation and litigation	0.6	\$465	\$ 279.00
2019-03-07	LCF	Review voicemail from Ms. Johnson, attempt to reach her, draft follow-up correspondence; receive return call and correspond with Ms. Johnson regarding mediation and outline options regarding the same	0.5	\$425	\$ 212.50
2019-03-13	LCF	Call with Mr. and Mrs. Lee regarding pending class action and next steps, including follow-up correspond to Ms. Lam to request representation agreement be sent and summarizing facts learned through call, draft and send follow-up email to Mr. and Mrs. Lee to confirm next steps	1.2	\$425	\$ 510.00
2019-03-14	LCF	Correspond with Ms. Lee regarding documents sent	0.1	\$425	\$ 42.50
2019-03-14	LCF	Begin to review and analyze documents received from Mr. and Mrs. Lee and outline thoughts regarding the same	0.3	\$425	\$ 127.50
2019-03-22	LCF	Correspond with Loretta and James Lee regarding upcoming mediation and analyze strategy regarding the same	0.2	\$425	\$ 85.00

2019-03-22	LCF	Review correspondence from co-counsel requesting that our office follow-up with clients with upcoming mediations, follow up with Mr. Windsor regarding the same, attempt to reach another plaintiff, update Mr. Bloomfield and Ms. Lam	0.5	\$425	\$ 212.50
2019-03-25	LCF	Correspond with potential class members Mr. and Mrs. Lee regarding upcoming mediation	0.3	\$425	\$ 127.50
2019-04-01	LCF	Correspond with potential putative class member, James Christopher, regarding recent letter received from Wells Fargo, follow-up correspondence with him, review documents, analyze potential claim, outline facts from Mr. Christopher and circulate thoughts regarding the same	0.7	\$425	\$ 297.50
2019-04-03	LCF	Continue to analyze potential next steps with respect to additional letters and \$300 checks sent out, correspond with team regarding same	0.1	\$425	\$ 42.50
2019-04-12	LCF	Review voicemail from Ms. Wimbush, putative class member with whom I previously spoke, attempted to return call and sent follow-up email	0.1	\$425	\$ 42.50
2019-07-24	LCF	Correspond with class member, Ms. Lewis, regarding her recent letter from Wells Fargo and review general option to mediate or "sign up" for class	0.4	\$425	\$ 170.00
2019-07-25	LCF	Follow-up correspondence with class member, Ms. Lewis, regarding her recent letter from Wells Fargo and review general option to mediate or "sign up" for class, including review additional questions from her regarding same	0.1	\$425	\$ 42.50

2019-08-06	LCF	Correspond with class member regarding options, including review facts regarding his experience with Wells Fargo, draft summary of call and circulate to the team, request that Ms. Lam send him representation agreement, send follow-up correspondence to him along with instructions regarding finalizing rep agreement	1.1	\$425	\$ 467.50
2019-08-09	LCF	Receive call from Helen Lewis, class member deciding how to proceed, outlined options to mediate or not; updated notes regarding call in database	0.2	\$425	\$ 85.00
2019-09-03	LCF	Correspond with class member, Lily Hall, regarding mediation and her options to pursue the same or continue with class case, outline options and next steps, draft summary of notes from call for the file	0.6	\$425	\$ 255.00
2019-09-05	LCF	Correspond with class member, Kimberly Wright, regarding case status and options/next steps	0.5	\$425	\$ 212.50
2019-10-08	LCF	Correspond with class member, Jayne Carr, regarding her recent receipt of "sorry" letter from Wells Fargo, mediation, and next steps	0.7	\$425	\$ 297.50
2019-10-09	LPL	Call with class member John Chambers to tell him about the case and explain his options to him; send him a representation agreement to sign	0.7	\$465	\$ 325.50
2019-10-11	LCF	Follow-up call with Ms. Carr to confirm appears she is a class member and to continue to outline options/potential next steps, including confirm she will move forward with mediation on her own at this time, and draft update to team regarding call; draft summary of call	0.6	\$425	\$ 255.00
2019-10-31	LPL	E-mails and call with class member Joomi Lim re: her mediation and options for being a part of the litigation	0.5	\$465	\$ 232.50

2019-11-22	LCF	Correspond with potential class member, Ms. Carr	0.2	\$425	\$ 85.00
2020-01-06	LCF	Return call to putative class member, Dudley Halter, review case status and general questions with him, draft and send follow-up email with copy of Complaint	0.5	\$425	\$ 212.50
2020-01-07	LCF	Summarize yesterday's call with putative class member, Dudley Halter, for the file	0.1	\$425	\$ 42.50
2020-01-08	LCF	Review and respond to further correspondence from Georgia putative class member, Dudley Halter	0.1	\$425	\$ 42.50
2020-01-27	LCF	Correspond with putative class member, Joe Langdon, regarding claims and potential next steps	0.3	\$425	\$ 127.50
		Project Total:	164.3		\$ 87,190.00
Project: Responding to inquiries from potentially affected borrowers					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-10-30	AB	Correspond with possible class members concerning follow-up questions on their modifications.	0.4	\$430	\$ 172.00
2018-11-05	AB	Writeup of call with possible class member.	0.2	\$430	\$ 86.00
2018-11-05	AB	Speak with potential class member concerning Wells Fargo's wrongful refusal to give him a modification.	0.4	\$430	\$ 172.00
2018-11-06	AB	Draft email to reach out to potential class members who contacted us about modification issues.	0.3	\$430	\$ 129.00
2018-11-06	AB	Speak with potential class member concerning her denial of a mortgage modification.	0.6	\$430	\$ 258.00
2018-11-07	AB	Contact possible class member who says that Wells Fargo wrongfully denied her a mortgage modification.	0.2	\$430	\$ 86.00
2018-11-15	AB	Speak with possible class member concerning mortgage modification she wasn't offered on her condo.	1.1	\$430	\$ 473.00
2018-11-16	AB	Follow up with possible class members concerning their mortgage paperwork.	0.4	\$430	\$ 172.00

2018-11-21	AB	Reach out to borrowers who believe they were affected by the Wells Fargo calculation error that led to wrongful denials of loan modifications.	0.6	\$430	\$ 258.00
2018-11-29	MLS	Phone calls with possible class members to gather facts and explain WF error	0.6	\$800	\$ 480.00
2018-11-29	AB	Speak with borrowers who believe they were impacted by the Wells Fargo calculation error.	1.7	\$430	\$ 731.00
2018-11-30	AB	Speak with affected borrowers who believe their mortgage modification denials were due to the announced software error.	1.3	\$430	\$ 559.00
2018-12-06	JJB	Emails re possible class members	0.2	\$580	\$ 116.00
2018-12-06	AB	Speak with borrowers who think they were impacted by the Wells Fargo software glitch.	1.3	\$430	\$ 559.00
2018-12-07	MLS	Review emails and documents from possible class members and A. Blumenthal;	0.3	\$800	\$ 240.00
2018-12-07	AB	Speak with borrowers who think they were impacted by the Wells Fargo software glitch.	1.9	\$430	\$ 817.00
2018-12-10	JJB	Calls and emails with possible class members	2.3	\$580	\$ 1,334.00
2018-12-11	JJB	Calls and emails with possible class members	2.3	\$580	\$ 1,334.00
2018-12-12	MLS	Review client documents and emails; tel. calls with possible class members; discuss with J. Bloomfield and A. Blumenthal	0.6	\$800	\$ 480.00
2018-12-12	LCF	Correspond with putative class members who previously contacted firm, including update notes regarding the same; outline and analyze thoughts regarding potential next steps in light of Court Order regarding correspondence with putative class members	1.4	\$425	\$ 595.00
2018-12-12	JJB	Calls and emails with possible class members	2.1	\$580	\$ 1,218.00

2018-12-13	AB	Revise draft communication to borrowers reaching out to us to find out if they are affected with information about how to contact Wells Fargo to get an answer.	0.4	\$430	\$ 172.00
2018-12-13	LCF	Correspond with putative class members who previously contacted firm, including update notes regarding the same and additional information gathered in relation to claims	0.5	\$425	\$ 212.50
2018-12-13	AGS	Listen to voicemail from possible class member; analyze how to respond in connection with Court's order on interviewing absent class members; work on analysis to respond	0.9	\$575	\$ 517.50
2018-12-13	MLS	Emails and tel. calls w/ possible class members to gather facts and explain error and lawsuit filed	1.2	\$800	\$ 960.00
2018-12-14	MLS	Emails and tel. calls w/ possible class members to gather facts and explain case	0.7	\$800	\$ 560.00
2018-12-14	JJB	Calls and emails with possible class members	2.3	\$580	\$ 1,334.00
2018-12-17	MLS	Emails and phone calls to possible class members; conf. J. Bloomfield re same	0.6	\$800	\$ 480.00
2018-12-17	JJB	Calls and emails with possible class members	3.4	\$580	\$ 1,972.00
2018-12-18	JJB	Calls and emails with possible class members	3	\$580	\$ 1,740.00
2018-12-19	LPL	Calls with J. Boomfield and possible class members re: gathering their facts on loan modifications and telling them about the litigation	0.5	\$465	\$ 232.50
2018-12-19	JJB	Calls and emails with possible class members	3.3	\$580	\$ 1,914.00
2018-12-20	LPL	Review income leads from website from potential class members; e-mails with J. Bloomfield re: same	0.2	\$465	\$ 93.00
2018-12-20	JJB	Calls and emails with possible class members	1.5	\$580	\$ 870.00
2018-12-21	LPL	Call and e-mails with possible class member Jeffrey Howes	0.2	\$465	\$ 93.00

2018-12-21	LPL	Confer with J. Bloomfield re: responding to certain leads who seem to be members of our proposed class	0.3	\$465	\$ 139.50
2018-12-21	JJB	Calls and emails with possible class members	2.2	\$580	\$ 1,276.00
2018-12-26	LPL	Review and analyze incoming leads and facts from potential clients/class members	0.2	\$465	\$ 93.00
2018-12-27	LPL	Call to possible class member Kelli Roche to get background on her attempted loan modification	0.1	\$465	\$ 46.50
2018-12-27	JJB	Calls and emails with possible class members	1.8	\$580	\$ 1,044.00
2018-12-28	LPL	Review e-mails from leads for messages from potential class members/clients	0.2	\$465	\$ 93.00
2018-12-28	JJB	Calls and emails with possible class members	1.3	\$580	\$ 754.00
2019-01-02	LPL	Review incoming leads for potential class members/clients who are asking about their legal rights	0.4	\$465	\$ 186.00
2019-01-02	JJB	Calls and emails with clients and possible class members	1.6	\$580	\$ 928.00
2019-01-03	AB	Review communication with borrowers who contacted us asking if they were affected by the Wells Fargo loan modification calculation errors.	0.4	\$430	\$ 172.00
2019-01-03	LPL	Review incoming leads from potential class members/clients and send e-mails to those who state they received a letter and a check	0.4	\$465	\$ 186.00
2019-01-03	JJB	Calls and emails with clients and possible class members	1.7	\$580	\$ 986.00
2019-01-04	LPL	Calls with J. Bloomfield and potential class members/clients re: background on the case and their experiences with WF loan modifications	1	\$465	\$ 465.00
2019-01-04	JJB	Calls and emails with clients and possible class members	1.3	\$580	\$ 754.00
2019-01-07	LPL	Review and analyze incoming leads from potential class members/clients on their case facts	0.3	\$465	\$ 139.50

2019-01-07	GAM	Call with EHG re discussions with clients and possible class members, managing claims	0.6	\$720	\$ 432.00
2019-01-07	JJB	Calls and emails with clients and possible class members	2.1	\$580	\$ 1,218.00
2019-01-08	LPL	Review and analyze incoming leads from potential class members/clients	0.1	\$465	\$ 46.50
2019-01-08	JJB	Calls and emails with clients and possible class members	2	\$580	\$ 1,160.00
2019-01-09	JJB	Calls and emails with clients and possible class members	1	\$580	\$ 580.00
2019-01-10	RPN	Call with possible class member about joining case	0.3	\$230	\$ 69.00
2019-01-10	JJB	Calls and emails with clients and possible class members	2.2	\$580	\$ 1,276.00
2019-01-11	JJB	Calls and emails with clients and possible class members	2.6	\$580	\$ 1,508.00
2019-01-14	AGS	Review client intake information; work on intake spreadsheet with L. Lam; review status of calls/emails and return contact	0.2	\$575	\$ 115.00
2019-01-14	MLS	emails and tel. calls with potential clients and class members; conf. L. Lam and J. Bloomfield re same	0.6	\$800	\$ 480.00
2019-01-14	LPL	Field incoming calls from potential class members/clients; send out representation agreements; organize clients	2.8	\$465	\$ 1,302.00
2019-01-14	JJB	Calls and emails with clients and possible class members	3.6	\$580	\$ 2,088.00
2019-01-15	UC	Client Calls (Spanish Speaker)	0.4	\$280	\$ 112.00
2019-01-15	LPL	Gather and organize list of class members who have reached out to our firm; call with J. Bloomfield re: same	0.6	\$465	\$ 279.00
2019-01-15	MLS	emails and phone calls re client contacts and retentions; tel. call M. Dann re discovery; emails re same	0.7	\$800	\$ 560.00
2019-01-15	JJB	Calls and emails with clients and possible class members	3.4	\$580	\$ 1,972.00
2019-01-16	LPL	Conf. call with team re: how to handle incoming calls from potential clients/class members; evidence preservation letters; organizing client information	0.2	\$465	\$ 93.00

2019-01-16	MLS	Emails re client inquiries	0.2	\$800	\$ 160.00
2019-01-16	AB	Write up factual situation for homeowner who says she was affected by Wells Fargo mortgage modification errors.	1.2	\$430	\$ 516.00
2019-01-16	JJB	Calls and emails with clients and possible class members	3.1	\$580	\$ 1,798.00
2019-01-17	MLS	Review emails re new clients	0.3	\$800	\$ 240.00
2019-01-17	RMP	Work on responding to putative class member inquiries	0.3	\$725	\$ 217.50
2019-01-17	JJB	Calls and emails with clients and possible class members	3.7	\$580	\$ 2,146.00
2019-01-18	KDJ	Create database and populate with client information	0.6	\$250	\$ 150.00
2019-01-18	JJB	Calls and emails with clients and possible class members	3.5	\$580	\$ 2,030.00
2019-01-21	LPL	Review and log incoming calls and e-mails from potential class members/clients	0.3	\$465	\$ 139.50
2019-01-22	LPL	Review and log new incoming calls and e-mails from potential class members/clients	0.3	\$465	\$ 139.50
2019-01-22	LPL	Calls with class members who have called in regarding the case; e-mail those class members with rep agreements for them to sign	1.5	\$465	\$ 697.50
2019-01-22	JJB	Calls and emails with clients and possible class members	3.7	\$580	\$ 2,146.00
2019-01-23	MLS	Conf. J. Bloomfield re client calls; review emails re same	0.3	\$800	\$ 240.00
2019-01-23	LPL	Review, log, and organize incoming calls and e-mails from potential clients/class members; call back class members	1.8	\$465	\$ 837.00
2019-01-23	JJB	Calls and emails with clients and possible class members	3.5	\$580	\$ 2,030.00
2019-01-24	LPL	Review and log recent incoming calls and e-mails from class members/potential clients	0.6	\$465	\$ 279.00
2019-01-24	UC	Spanish Lead Calls	0.9	\$280	\$ 252.00
2019-01-24	LPL	Calls with class members/potential clients who have reached out to GLG	1.8	\$465	\$ 837.00
2019-01-24	JJB	Calls and emails with clients and possible class members	3.3	\$580	\$ 1,914.00

2019-01-25	LPL	Review and log incoming e-mails and calls from potential class members	0.3	\$465	\$ 139.50
2019-01-25	JJB	Calls and emails with clients and possible class members	3.4	\$580	\$ 1,972.00
2019-01-27	LPL	Review and log incoming calls and e-mails from class members/possible class members	0.1	\$465	\$ 46.50
2019-01-28	LPL	Review and log calls and e-mails from potential class members/clients; e-mails with J. Bloomfield and co-counsel re: same	0.2	\$465	\$ 93.00
2019-01-28	LPL	Calls back to class members/potential clients who reached out to our firm	0.3	\$465	\$ 139.50
2019-01-28	UC	Spanish Speaker Call	0.3	\$280	\$ 84.00
2019-01-28	LCF	Correspond with potential class members regarding status of matter and to gather facts regarding experiences with Wells Fargo; update notes regarding the same	1.2	\$425	\$ 510.00
2019-01-28	JJB	Calls and emails with clients and possible class members	3.7	\$580	\$ 2,146.00
2019-01-29	JJB	Calls and emails with clients and possible class members	2.7	\$580	\$ 1,566.00
2019-01-30	LPL	Review and log incoming calls from class members/potential clients; return calls to those individuals	0.1	\$465	\$ 46.50
2019-01-30	JJB	Calls and emails with clients and possible class members	3.1	\$580	\$ 1,798.00
2019-01-31	LPL	Review and log incoming e-mails and calls from class members/potential clients	0.1	\$465	\$ 46.50
2019-01-31	LPL	E-mails with J. Bloomfield re: whether we need to reach out to possible class members who indicated interest in mediation before the 1/31 deadline to submit mediation requests	0.2	\$465	\$ 93.00
2019-01-31	UC	Spanish Speaker Calls	1.1	\$280	\$ 308.00
2019-01-31	JJB	Calls and emails with clients and possible class members	3.2	\$580	\$ 1,856.00
2019-02-01	LPL	Review and log incoming calls and e-mails from class members / potential clients	0.1	\$465	\$ 46.50
2019-02-01	JJB	Calls and emails with clients and possible class members	2.3	\$580	\$ 1,334.00

2019-02-05	LPL	Review, analyze, and log incoming inquiries from potential class members/clients; confer with J. Bloomfield re: same	0.3	\$465	\$ 139.50
2019-02-05	KDJ	Update database with new class member/client information	0.3	\$250	\$ 75.00
2019-02-05	LPL	Calls back to class members/potential clients who have reached out to GLG	1	\$465	\$ 465.00
2019-02-05	JJB	Calls and emails with clients and possible class members	3	\$580	\$ 1,740.00
2019-02-06	JJB	Calls and emails with clients and possible class members	3.5	\$580	\$ 2,030.00
2019-02-07	LPL	Review and log incoming calls and e-mails from class members/clients	0.2	\$465	\$ 93.00
2019-02-07	LPL	Calls back to potential class members/clients who have reached out to GLG	0.6	\$465	\$ 279.00
2019-02-07	JJB	Calls and emails with clients and possible class members	2.9	\$580	\$ 1,682.00
2019-02-08	MLS	Tel. calls and emails w/ potential clients	0.3	\$800	\$ 240.00
2019-02-08	JJB	Calls and emails with clients and possible class members	3.3	\$580	\$ 1,914.00
2019-02-11	LPL	Call with M. Schrag and potential class member Eric Davison re: the facts of his case and whether he is a class member; e-mail to E. Davison re: same	0.4	\$465	\$ 186.00
2019-02-11	LPL	Review and log incoming calls from class members/potential clients	0.6	\$465	\$ 279.00
2019-02-11	JJB	Calls and emails with clients and possible class members	3.5	\$580	\$ 2,030.00
2019-02-12	LPL	Review and log incoming calls and e-mails from clients/class members	0.2	\$465	\$ 93.00
2019-02-12	UC	Spanish Speaker Call	0.3	\$280	\$ 84.00
2019-02-12	MLS	Emails and tel. calls re client issues and new clients	0.7	\$800	\$ 560.00
2019-02-12	JJB	Calls and emails with clients and possible class members	3.3	\$580	\$ 1,914.00
2019-02-13	LPL	Review and log incoming calls from potential class members/clients	0.4	\$465	\$ 186.00
2019-02-13	UC	Spanish Speaker Calls	0.7	\$280	\$ 196.00
2019-02-13	JJB	Calls and emails with clients and possible class members	3.8	\$580	\$ 2,204.00
2019-02-14	LPL	Review and log incoming calls from class members/potential clients	0.1	\$465	\$ 46.50

2019-02-14	JJB	Calls and emails with clients and possible class members	3.7	\$580	\$ 2,146.00
2019-02-15	JJB	Calls and emails with clients and possible class members	3.2	\$580	\$ 1,856.00
2019-02-18	LPL	Review and log incoming e-mails and calls from class members/potential clients	0.3	\$465	\$ 139.50
2019-02-18	JJB	Calls and emails with clients and possible class members	2.5	\$580	\$ 1,450.00
2019-02-19	LPL	Review and log incoming calls and e-mails from class members / potential clients	0.2	\$465	\$ 93.00
2019-02-19	UC	Spanish Lead Calls	0.7	\$280	\$ 196.00
2019-02-19	JJB	Calls and emails with clients and possible class members	2.6	\$580	\$ 1,508.00
2019-02-20	LPL	Review and log incoming calls and e-mails from class members / potential clients	0.2	\$465	\$ 93.00
2019-02-20	JJB	Calls and emails with clients and possible class members	1.4	\$580	\$ 812.00
2019-02-20	JJB	Calls and emails to prospective class representatives	1.7	\$580	\$ 986.00
2019-02-21	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-02-21	JJB	Calls and emails to prospective class representatives	0.7	\$580	\$ 406.00
2019-02-21	JJB	Calls and emails with clients and possible class members	2.6	\$580	\$ 1,508.00
2019-02-22	LPL	Review and analyze incoming e-mails and calls from potential class members	0.2	\$465	\$ 93.00
2019-02-22	JJB	Calls and emails with clients and possible class members	2.7	\$580	\$ 1,566.00
2019-02-25	LPL	Review and log incoming e-mails and calls from potential class members; call to potential class member D. Nixon	0.3	\$465	\$ 139.50
2019-02-25	UC	Spanish Speaker Client Calls	0.5	\$280	\$ 140.00
2019-02-25	JJB	Calls with class members, clients and possible class members	1.3	\$580	\$ 754.00
2019-02-26	LPL	Review and log incoming calls from class members / potential clients	0.2	\$465	\$ 93.00
2019-02-26	MLS	Emails and tel. calls re client contacts	0.2	\$800	\$ 160.00
2019-02-26	LPL	Call to potential class members / clients Shawn McCormick (on behalf of John Chambers) and Rita Garcia	0.9	\$465	\$ 418.50

2019-02-26	JJB	Calls with class members, clients and possible class members	2.4	\$580	\$ 1,392.00
2019-02-27	LPL	Review, analyze, and log incoming e-mails from potential class members	0.2	\$465	\$ 93.00
2019-02-27	UC	Spanish Speaker Call	0.2	\$280	\$ 56.00
2019-02-27	KDJ	Update database with new potential class member/client information	0.2	\$250	\$ 50.00
2019-02-27	LPL	Call with potential class member Donald Nixon re: his experience with trying to get a modification through Wells Fargo	0.6	\$465	\$ 279.00
2019-02-27	JJB	Calls and emails with class members, clients and possible class members	3.1	\$580	\$ 1,798.00
2019-02-28	LPL	Call with lead Bobby Register re: background on our case and whether he is likely to be a class member	0.4	\$465	\$ 186.00
2019-02-28	LPL	Call with new lead Doris Pietrowski re: background on her case and her experience with her WF mortgage; send her a representation agreement	0.6	\$465	\$ 279.00
2019-02-28	JJB	Calls and emails with class members, clients and possible class members	2.2	\$580	\$ 1,276.00
2019-03-01	JJB	Calls and emails with class members, clients and possible class members	2.8	\$580	\$ 1,624.00
2019-03-02	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-03-04	JJB	Calls with class members, clients and possible class members	1.1	\$580	\$ 638.00
2019-03-05	LPL	Review and analyze incoming leads from potential class members; send response e-mails to a few of them	0.3	\$465	\$ 139.50
2019-03-05	JJB	Calls with class members, clients and possible class members	0.6	\$580	\$ 348.00
2019-03-06	JJB	Calls with class members, clients and possible class members	0.9	\$580	\$ 522.00
2019-03-06	LPL	Call back to potential class members Rachel Macon and Charlene Johnson; e-mails back to other leads who have reached out to us about the case	1.7	\$465	\$ 790.50
2019-03-07	LPL	Review and analyze incoming leads from potential class members/clients; e-mails back to several leads	0.4	\$465	\$ 186.00
2019-03-07	JJB	Calls with class members, clients and possible class members	2.5	\$580	\$ 1,450.00

2019-03-08	LPL	Review, analyze, and respond to incoming leads from potential clients/class members; work with J. Bloomfield and J. O'Boyle re: getting out an e-mail blast to all new leads	0.4	\$465	\$ 186.00
2019-03-08	LPL	Call with lead/class member Belinda Haggart re: background on the case; prepare representation agreement for her	0.7	\$465	\$ 325.50
2019-03-08	JJB	Calls and emails with class members, clients and possible class members	2	\$580	\$ 1,160.00
2019-03-11	LPL	Review and analyze incoming leads from potential class members/clients; calls and e-mails to potential class members	0.7	\$465	\$ 325.50
2019-03-11	JJB	Calls with class members, clients and possible class members	1.8	\$580	\$ 1,044.00
2019-03-12	LPL	Confer with J. Bloomfield re: call from potential class member Tyson Dodd	0.1	\$465	\$ 46.50
2019-03-12	LPL	Review and analyze incoming e-mails/calls from potential class members; call and e-mail some of them back	1	\$465	\$ 465.00
2019-03-12	JJB	Calls with class members, clients and possible class members	1.8	\$580	\$ 1,044.00
2019-03-13	LPL	Review and analyze incoming calls and e-mails from leads; calls and e-mails back to some potential class members	0.6	\$465	\$ 279.00
2019-03-13	JJB	Calls with class members, clients and possible class members re case status and mediation	2.7	\$580	\$ 1,566.00
2019-03-14	JJB	Calls with class members, clients and possible class members re case status and mediation	1.1	\$580	\$ 638.00
2019-03-15	JJB	Calls with class members, clients and possible class members re case status and mediation	1.6	\$580	\$ 928.00
2019-03-18	MLS	Emails and phone calls from potential class members; draft conf. call agenda; discuss mediation with L. Lam	0.6	\$800	\$ 480.00
2019-03-18	LPL	Review and analyze incoming e-mails and calls from potential class members; respond to some of those e-mails/calls	1.2	\$465	\$ 558.00

2019-03-19	LCF	Review inquiries from putative class members, attempt to reach the same	0.1	\$425	\$ 42.50
2019-03-19	LPL	Review and analyze incoming leads from potential class members; respond to some of those class members	0.4	\$465	\$ 186.00
2019-03-20	LPL	Review and analyze incoming leads from potential class members; send representation agreements to some	0.2	\$465	\$ 93.00
2019-03-25	JJB	Calls with class members, clients and possible class members	0.4	\$580	\$ 232.00
2019-03-25	LPL	Review and log incoming calls and e-mails from class members; e-mail to J. Bloomfield and co-counsel re: same	0.5	\$465	\$ 232.50
2019-03-26	JJB	Calls with class members, clients and possible class members	0.3	\$580	\$ 174.00
2019-03-27	JJB	Calls with class members, clients and possible class members	0.8	\$580	\$ 464.00
2019-03-28	JJB	Calls with class members, clients and possible class members	0.3	\$580	\$ 174.00
2019-03-29	JJB	Calls with class members, clients and possible class members	0.5	\$580	\$ 290.00
2019-03-29	LPL	Review, analyze, and log incoming calls from potential class members	0.8	\$465	\$ 372.00
2019-04-01	LPL	Review, analyze, and log incoming calls and e-mails from potential class members	0.8	\$465	\$ 372.00
2019-04-01	JJB	Calls and emails with potential class members	1.3	\$580	\$ 754.00
2019-04-02	LPL	Review and log incoming calls from potential class members; e-mail to J. Bloomfield and co-counsel re: same	0.3	\$465	\$ 139.50
2019-04-02	LPL	Calls and e-mails back to potential class members who have contacted GLG regarding issues on their WF loan modifications	0.5	\$465	\$ 232.50
2019-04-02	JJB	Calls and emails with potential class members	0.8	\$580	\$ 464.00
2019-04-03	JJB	Calls and emails with class members, clients and possible class members	1.2	\$580	\$ 696.00
2019-04-04	LPL	Review and analyze incoming e-mails and calls from potential class members	0.2	\$465	\$ 93.00
2019-04-04	LPL	E-mails in response to leads who may or may not be class members in current action	0.2	\$465	\$ 93.00

2019-04-04	LPL	Call with potential class member Tyson Dodd re: whether he might be a class member and the error that affected him: e-mail to defense counsel re: same	0.6	\$465	\$ 279.00
2019-04-04	JJB	Calls with class members, clients and possible class members	1.1	\$580	\$ 638.00
2019-04-05	LPL	Review and analyze incoming e-mails and calls from potential class members	0.1	\$465	\$ 46.50
2019-04-05	JJB	Calls with class members, clients and possible class members	0.6	\$580	\$ 348.00
2019-04-07	LPL	Review and analyze incoming e-mails from potential class members	0.1	\$465	\$ 46.50
2019-04-08	LPL	Review and analyze incoming leads from potential class members; e-mails with J. Bloomfield and co-counsel re: same	0.1	\$465	\$ 46.50
2019-04-08	LPL	Call with incoming leads who are potential class members re: background on our class action and whether they're likely to be class members	0.2	\$465	\$ 93.00
2019-04-08	JJB	Calls and emails with potential class members	0.8	\$580	\$ 464.00
2019-04-09	LPL	Calls to potential class members who sent us inquiries on the status of the case and whether they should sign up as clients	0.9	\$465	\$ 418.50
2019-04-09	JJB	Calls and emails with potential class members	1	\$580	\$ 580.00
2019-04-10	LPL	Review and analyze incoming leads from potential class members; e-mails back to respond to certain leads	0.2	\$465	\$ 93.00
2019-04-10	JJB	Calls and emails with potential class members	1.2	\$580	\$ 696.00
2019-04-11	LPL	Review and analyze incoming e-mails and calls from potential class members	0.2	\$465	\$ 93.00
2019-04-11	JJB	Calls and emails with potential class members	0.9	\$580	\$ 522.00
2019-04-15	LPL	Review and analyze incoming leads from potential class members; e-mails with J. Bloomfield and co-counsel re: same	0.3	\$465	\$ 139.50
2019-04-16	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50

2019-04-17	LPL	Review and analyze incoming leads from potential class members; respond to some via e-mail	0.3	\$465	\$ 139.50
2019-04-22	LPL	Review and analyze incoming leads from potential class members	0.2	\$465	\$ 93.00
2019-04-22	JJB	Calls and emails with clients and possible class members	1.8	\$580	\$ 1,044.00
2019-04-23	LPL	Review and analyze incoming leads; e-mails with J. Bloomfield and co-counsel re: same	0.2	\$465	\$ 93.00
2019-04-23	JJB	Calls and emails with clients and possible class members	1.1	\$580	\$ 638.00
2019-04-24	LPL	Review and analyze incoming leads from potential class members	0.2	\$465	\$ 93.00
2019-04-24	JJB	Calls and emails with clients and possible class members	1.1	\$580	\$ 638.00
2019-04-25	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-04-25	JJB	Calls and emails to clients and possible class members	0.6	\$580	\$ 348.00
2019-04-26	LPL	Review and analyze incoming leads from potential class members	0.2	\$465	\$ 93.00
2019-04-26	JJB	Calls and emails with clients and possible class members re case status and class membership	1.1	\$580	\$ 638.00
2019-04-28	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-04-29	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-04-29	JJB	Calls and emails with clients and possible class members re case status and class membership	0.9	\$580	\$ 522.00
2019-04-30	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-04-30	JJB	Calls and emails with clients and possible class members	0.4	\$580	\$ 232.00
2019-05-01	JJB	Calls and emails with clients and possible class members re case status and class membership	1.1	\$580	\$ 638.00
2019-05-02	JJB	Calls and emails with clients and possible class members re case status and class membership	0.7	\$580	\$ 406.00

2019-05-03	JJB	Work on email updates to class members and likely non-class members	0.4	\$580	\$ 232.00
2019-05-07	JJB	Calls and emails with potential class members	1.1	\$580	\$ 638.00
2019-05-08	LPL	Review and analyze incoming leads from potential class members	0.3	\$465	\$ 139.50
2019-05-08	LPL	Call with potential class member Phyllis Smith on background on our case and whether Ms. Smith is a likely class member	0.6	\$465	\$ 279.00
2019-05-08	JJB	Calls and emails with potential class members	1.2	\$580	\$ 696.00
2019-05-09	LPL	Review and analyze incoming leads from potential class members; e-mails with J. Bloomfield re: same	0.2	\$465	\$ 93.00
2019-05-09	JJB	Calls and emails with potential class members	1.8	\$580	\$ 1,044.00
2019-05-10	LPL	Call with client Arismendis Salas to update him on the case and address questions he had about our request for him to send us relevant documents	0.4	\$465	\$ 186.00
2019-05-14	LPL	Review and analyze incoming leads; e-mail responses to some leads	0.4	\$465	\$ 186.00
2019-05-15	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-05-17	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-05-20	LPL	Review and analyze incoming leads from potential class members	0.2	\$465	\$ 93.00
2019-05-31	MLS	Tel. call potential client	0.1	\$800	\$ 80.00
2019-05-31	LPL	Calls with leads Louis Haiek and Richard Crouch to discuss their facts and explain the basis of our class action lawsuit	0.8	\$465	\$ 372.00
2019-06-02	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50
2019-06-07	LPL	Review and analyze incoming leads from potential class members	0.2	\$465	\$ 93.00
2019-06-11	LPL	Calls with potential leads/class members who have inquiries into GLG about the case	0.6	\$465	\$ 279.00
2019-06-25	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$ 46.50

2019-06-26	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-06-27	LPL	Review and analyze incoming leads from potential class members; e-mail to team about new batch of potential class members	0.2	\$465	\$	93.00
2019-07-01	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-07-08	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-07-15	LPL	Call with potential class member Diane Harrison to tell her about the case and hear about her facts	0.7	\$465	\$	325.50
2019-07-16	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-07-17	LPL	Review and analyze incoming leads from potential class members	0.2	\$465	\$	93.00
2019-07-22	JJB	Return calls from potential class members seeking case information	1	\$580	\$	580.00
2019-07-23	JJB	Return calls from potential class members seeking case information	0.6	\$580	\$	348.00
2019-07-24	LPL	E-mails and calls with potential class members who have reached out to GLG	0.6	\$465	\$	279.00
2019-07-25	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-07-25	JJB	Return calls from potential class members seeking case information	1.1	\$580	\$	638.00
2019-07-26	JJB	Return calls from potential class members seeking case information	0.9	\$580	\$	522.00
2019-07-30	JJB	Return calls from potential class members seeking case information	0.8	\$580	\$	464.00
2019-07-31	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-07-31	JJB	Return calls from potential class members seeking case information	0.7	\$580	\$	406.00
2019-08-02	JJB	Calls with potential class members	1.1	\$580	\$	638.00
2019-08-06	LPL	Review and analyze incoming leads from potential class members; send rep agreement to class member Jameel Hayden	0.1	\$465	\$	46.50
2019-08-06	JJB	Calls with potential class members	0.8	\$580	\$	464.00
2019-08-07	JJB	Calls with potential class members	0.6	\$580	\$	348.00

2019-08-08	JJB	Calls and emails with clients and potential class members	0.6	\$580	\$	348.00
2019-08-09	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-08-09	JJB	Calls and emails with clients and potential class members	0.6	\$580	\$	348.00
2019-08-12	LPL	Review and analyze e-mails from incoming leads/potential class members; calls to potential class members	0.2	\$465	\$	93.00
2019-08-15	LPL	Review and analyze incoming leads from potential class members; e-mails with potential client Rochelle Thomas	0.1	\$465	\$	46.50
2019-08-21	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-08-22	NS	Discussion with LPL re: client leads and responses.	0.1	\$415	\$	41.50
2019-08-22	NS	Contacting possible class members to discuss their claims and assess representation.	1.2	\$415	\$	498.00
2019-08-29	JJB	Calls with potential class members	0.7	\$580	\$	406.00
2019-08-30	JJB	Calls to potential class members	0.7	\$580	\$	406.00
2019-09-03	LPL	Review and analyze incoming leads from potential class members; e-mails to J. Bloomfield and co-counsel L. Fellows re: same	0.2	\$465	\$	93.00
2019-09-04	LPL	Review and analyze incoming e-mails from potential class members	0.1	\$465	\$	46.50
2019-09-05	JJB	Calls and emails to possible class members	0.4	\$580	\$	232.00
2019-09-13	JJB	Calls to potential class members	0.9	\$580	\$	522.00
2019-09-16	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2019-09-19	LPL	Review and analyze incoming leads from potential class members/clients	0.1	\$465	\$	46.50
2019-10-21	LPL	Review and analyze incoming leads from potential class members	0.1	\$465	\$	46.50
2020-01-07	LPL	Calls to clients/potential class members who have called regarding the case	0.3	\$465	\$	139.50
2020-01-14	JJB	Calls and emails with clients and potential class members	1.1	\$580	\$	638.00
2020-02-07	LPL	E-mails with potential class members/clients on the case and status of the litigation	0.3	\$465	\$	139.50

2020-02-20	JJB	Calls with clients and potential class members	0.4	\$580	\$ 232.00
2020-02-21	LPL	E-mails with J. Bloomfield re: fielding incoming calls from class members asking about the case	0.1	\$465	\$ 46.50
2020-03-19	JJB	Call with potential class member E. Yesuvida	0.3	\$580	\$ 174.00
2020-03-25	JJB	Email to potential class member	0.1	\$580	\$ 58.00
		Project Total:	276.9		\$ 152,522.00
Project: Order to show cause					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-12-04	AB	Strategize concerning Wells Fargo's ongoing contact with potential class members	0.3	\$430	\$ 129.00
2018-12-12	JJB	Review court order re contact with absent class members	0.3	\$580	\$ 174.00
2018-12-12	AB	Revise draft statement to the Court explaining situation with Wells Fargo's ongoing contact with class members	0.5	\$430	\$ 215.00
2018-12-12	JJB	Draft and circulate status report re mediation program	1.8	\$580	\$ 1,044.00
2018-12-12	AB	Analyze the effect of the Court's standing order regarding absent class member communication on putative class members who contact us seeking legal advice and on Wells Fargo's ongoing mediation efforts.	2.7	\$430	\$ 1,161.00
2018-12-12	MLS	Review court order re communications/interviews/settlement discussions; conf. call Team re same; work on filing in response to Order; conf. A. Mura re same	2.7	\$800	\$ 2,160.00
2018-12-13	RMP	Draft status report and request for show cause order; analyze case strategy	1.7	\$725	\$ 1,232.50
2018-12-13	JJB	Work on draft request for order to show cause	2.6	\$580	\$ 1,508.00
2018-12-13	MLS	Review/edit status report and request for Order to Show Cause; emails and conf. A. Mura re same; conf. call Team re same; review memo re representing individual and class claims	3.3	\$800	\$ 2,640.00

2018-12-14	JJB	Draft M. Schrag declaration in support of request for order to show cause	0.6	\$580	\$ 348.00
2018-12-14	MLS	Work on status conf statement and req for OSC; conf. J. Bloomfield and A. Mura re same	1.2	\$800	\$ 960.00
2018-12-14	JJB	Work on draft request for order to show cause	1.3	\$580	\$ 754.00
2018-12-15	JJB	Finalize and circulate draft M. Schrag declaration in support of request for OSC	0.5	\$580	\$ 290.00
2018-12-15	JJB	Emails re request for OSC	0.6	\$580	\$ 348.00
2018-12-16	RMP	Review revised draft of status report and request for show cause order	0.1	\$725	\$ 72.50
2018-12-17	RMP	Review mediation agreement; analyze effect on request for show cause order	0.3	\$725	\$ 217.50
2018-12-17	JJB	Draft proposed order re request for OSC	0.4	\$580	\$ 232.00
2018-12-17	JJB	Call with co-counsel re OSC	0.5	\$580	\$ 290.00
2018-12-17	MLS	Review/edit/finalize status report and request for OSC; discuss same w/ E. Gibbs and A. Mura	2.8	\$800	\$ 2,240.00
2018-12-18	JJB	Serve OSC on Wells Fargo	0.2	\$580	\$ 116.00
2018-12-18	JJB	Review and analyze OSC issued by Judge Alsup	0.4	\$580	\$ 232.00
2018-12-18	LCF	Review Court's Show Cause Order to Wells Fargo regarding communications with absent putative class members, outline and analyze potential next steps and legal research to conduct in light of the same	0.5	\$425	\$ 212.50
2018-12-18	RMP	Review Show Cause Order; analyze case strategy to prepare for show cause hearing	1.9	\$725	\$ 1,377.50
2018-12-18	MLS	Review court order; emails Team re same; conf. call re 1/3 hearing, JAMS mediations and research issues	2.7	\$800	\$ 2,160.00
2018-12-19	LPL	Confer with M. Schrag re: current status on the case, upcoming hearing on order to show cause, and next steps	0.3	\$465	\$ 139.50
2018-12-19	LPL	Review and analyze order to show cause and plaintiff's motion for the same	0.3	\$465	\$ 139.50

2018-12-19	LPL	Call with M. Schrag, J. Bloomfield, and G. Munroe re: background on the case and plan for preparing for hearing on Jan. 3rd	0.4	\$465	\$ 186.00
2018-12-21	GAM	Team call re early research findings, client update, possible approaches to upcoming status conference	0.6	\$720	\$ 432.00
2018-12-21	LPL	Conference call with M. Schrag, J. Bloomfield, G. Munroe and co-counsel re: how to approach upcoming WF mediation deadline and our 1/3 hearing on order to show cause	0.6	\$465	\$ 279.00
2018-12-28	RMP	Conference call with opposing counsel; review correspondence with opposing counsel	0.2	\$725	\$ 145.00
2018-12-28	MLS	Conf. call def. counsel and R. Paul re hearing on 1/3	0.3	\$800	\$ 240.00
2018-12-31	LCF	Review Wells Fargo's Response in Opposition to Show Cause Order, outline preliminary thoughts regarding the same	0.2	\$425	\$ 85.00
2018-12-31	GAM	Review WF's response to OSC and cases cited	0.6	\$720	\$ 432.00
2018-12-31	RMP	Review Wells Fargo's response to Show Cause Order; analyze response and prepare for show cause hearing	0.6	\$725	\$ 435.00
2018-12-31	JJB	Review and analyze Wells Fargo response to Order to Show Cause	0.8	\$580	\$ 464.00
2018-12-31	MLS	Review WF response to OSC; conf. call Team re same; review cases cited	2	\$800	\$ 1,600.00
2019-01-02	LPL	Review and analyze Wells Fargo's response to order to show cause	0.4	\$465	\$ 186.00
2019-01-02	LPL	Meeting with M. Schrag, R. Paul, and J. Bloomfield re: preparing for hearing on order to show cause	0.6	\$465	\$ 279.00

2019-01-02	LCF	Assist with preparations for January 3 hearing on Show Cause Order, including research standards for class certification and approval of settlements by Judge Alsup, review and analyze alternative dispute resolution, handbook and potential options for Northern District of California, begin to analyze initial discovery needed; outline thoughts and analysis regarding the same	0.8	\$425	\$ 340.00
2019-01-02	JJB	Meetings with co-counsel re OSC	1.1	\$580	\$ 638.00
2019-01-02	MLS	Meeting R. Paul and E. Gibbs re prep for OSC hearing and meet/confer w/ Def. counsel, class cert. strategy, mediation issues and overall case strategy. Pre OSC Meet/Confer A. Groves and K. Brinson re mediations and discovery; travel to/from SF; further hearing prep w/ R. Paul,	4.5	\$800	\$ 3,600.00
2019-01-02	RMP	Prepare for show cause hearing; meeting with opposing counsel; travel to San Francisco from Kansas City for hearing	8.3	\$725	\$ 6,017.50
2019-01-03	LPL	Confer with M. Schrag re: how the hearing on the order to show cause went and implications for moving forward in the case	0.2	\$465	\$ 93.00
2019-01-03	LCF	Assist with preparation and analysis of legal issues in advance of hearing regarding Show Cause Order, including research similar Order in which pre-certification communications with putative class members limited, outline thoughts regarding the same, as well as research disclosures required before obtaining declarations and analyze relevant case law, outline thoughts regarding the same	2.4	\$425	\$ 1,020.00

2019-01-03	MLS	Prep for OSC hearing; conf. R. Paul re prep for hearing; review cases; OSC hearing re mediations and ex parte communications; conf. R. Paul and J. Bloomfield re same; conf. E. Gibbs re same. tell. call class rep to update her on above.	5.2	\$800	\$ 4,160.00
2019-01-03	RMP	Prepare for show cause hearing; show cause hearing; draft Case Management statement; return travel to Kansas City	8.5	\$725	\$ 6,162.50
2019-01-04	GAM	Team call re strategy after status conference, including on private mediation, client contacts, response to motion to transfer	1	\$720	\$ 720.00
2019-01-04	LPL	Conference call with team re: next steps in case in light of hearing on order to show cause, and how to approach class members who call us	1	\$465	\$ 465.00
		Project Total:	70.8		\$ 48,371.50
Project: Corrective letters to class members stemming from order to show cause					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-01-04	LCF	Analyze next steps, including contact with current clients and response to Court's forthcoming Order regarding curative letter to be sent	1	\$425	\$ 425.00
2019-01-07	GAM	Call with MLS re status of WF letter to class members, setting up team call re class member contacts	0.3	\$720	\$ 216.00
2019-01-08	LCF	Continue outlining and analyzing talking points for putative class members and current clients to communicate in response to inquiries regarding mediation and forthcoming supplemental correspondence from Wells Fargo as ordered by Judge Alsup	0.6	\$425	\$ 255.00
2019-01-09	GAM	Review draft letters to class members from Wells Fargo, call with team re issues and proposed edits; brief follow-up discussion with Josh re contact info to include in letters	0.7	\$720	\$ 504.00
2019-01-09	JJB	Review and revise draft letters to affected borrowers	0.8	\$580	\$ 464.00

2019-01-09	MLS	Review/edit letters to class members; conf. R. Paul re same	1	\$800	\$ 800.00
2019-01-09	RMP	Work on letter from Wells Fargo to proposed class members	1	\$725	\$ 725.00
2019-01-09	JJB	Call with co-counsel re WF corrective letter	1.2	\$580	\$ 696.00
2019-01-09	LCF	Assist with four different versions of draft letters to putative class members advising of rights pursuant to Judge Alsup's Order, including analyze and edit initial drafts from Wells Fargo, review and incorporate edits from co-counsel and circulate final draft redline of four letters for review and finalizing	1.6	\$425	\$ 680.00
2019-01-10	RMP	Work on Wells Fargo corrective letter to potential class members; phone call with opposing counsel regarding letter	0.8	\$725	\$ 580.00
2019-01-10	JJB	Review and revise draft letters to affected borrowers	1.1	\$580	\$ 638.00
2019-01-10	MLS	Review/edit letter to potential class members; emails w/ Team re same; conf. call Def. counsel and R. Paul re letters	1.2	\$800	\$ 960.00
2019-01-11	JJB	Review and revise draft letters to affected borrowers	0.6	\$580	\$ 348.00
2019-01-11	MLS	Conf. call Team re letters to class members, motion to transfer opp. and client status updates; conf. call def, counsel re letters; tel. call R. Paul re same; conf. E. Gibbs re same; emails re flow of calls and emails in response to letters	2.8	\$800	\$ 2,240.00
2019-02-08	MLS	Meet confer def. counsel re dates/extensions; letters sent w/ out class action info; loan files;	0.3	\$800	\$ 240.00
2019-10-10	LPL	Review and analyze draft letter to WF regarding its continued communications with class members; confer with M. Schrag re: same	0.6	\$465	\$ 279.00
2019-10-10	MLS	Review WF letter to class members; conf. L. Fellows re same; draft letter to WF counsel re inaccuracies in letter	1.7	\$800	\$ 1,360.00

2019-10-10	LCF	Analyze Wells Fargo's failure to update apology letter to class members regarding status of case and circulate to the team, outline and analyze potential next steps and review feedback regarding decision to draft follow-up letter to Wells Fargo's counsel; draft proposed follow-up correspondence to Ms. Groves and Ms. Brinson regarding issues with letter, propose revised language, and request update class list in excel format; review proposed revisions from Mr. Schrag and correspond with Mr. Schrag regarding additional edits and information to include in draft letter	2.2	\$425	\$ 935.00
2019-10-11	MLS	Review/edit letter re class member communications	0.5	\$800	\$ 400.00
2019-10-11	LCF	Revise proposed follow-up correspondence to Ms. Groves and Ms. Brinson regarding issues with letter to class members, including research cases to cite regarding necessity of accurate information to class members, analyze and compare two versions of purported class list for potential changes, and outline thoughts regarding class list and draft letter and send revised draft to team	2	\$425	\$ 850.00
2020-01-02	LCF	Continue to analyze questions regarding Wells Fargo's continued sending of additional payments to clients, including review correspondence between Ms. Lam and Ms. Brinson regarding the same	0.1	\$425	\$ 42.50
		Project Total:	22.1		\$ 13,637.50
Project: First amended complaint					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-12-19	GAM	Call with MLS and team re case history, clients, research done so far and ideas to look into	0.6	\$720	\$ 432.00

2018-12-19	GAM	Review complaint, filings, and orders; begin researching underlying HAMP law, survey HAMP litigation	3.7	\$720	\$ 2,664.00
2018-12-20	MLS	Tel. calls G. Munroe re class issues and potential claims and damages theories	0.8	\$800	\$ 640.00
2018-12-20	LPL	Review and analyze cases from A. Blumenthal and e-mails from G. Munroe re: HAMP cases and potential causes of action for our case	1.8	\$465	\$ 837.00
2018-12-20	GAM	Research potential California claims, including Homeowners Bill of Rights, wrongful foreclosure, and negligence, and emotional distress damages	7.4	\$720	\$ 5,328.00
2018-12-21	MLS	Tel. call G. Munroe re research topics and potential claims and class issues; draft email re same	0.3	\$800	\$ 240.00
2018-12-21	LPL	Legal research re: whether other states have statutes similar to California's Homeowner Bill of Rights	0.6	\$465	\$ 279.00
2018-12-21	GAM	Continue research of potential class claims, including analysis of potential contract-based claims, implied covenant claims, review of ND Cal and Alsup case law in prior HAMP litigation	7.1	\$720	\$ 5,112.00
2018-12-23	GAM	Continue research of potential claims, focusing on review of Alsup and ND Cal cases in prior HAMP litigation	2.7	\$720	\$ 1,944.00
2018-12-24	LPL	Review, analyze, and organize relevant factual background on current 12 clients' loan modification applications with Wells Fargo	0.9	\$465	\$ 418.50
2018-12-24	GAM	Continue research and analysis of potential class claims	4.1	\$720	\$ 2,952.00
2018-12-25	GAM	Review L. Lam research into other states with Homeowners Bill of Rights	0.3	\$720	\$ 216.00
2018-12-25	LPL	Legal research re: whether other states have enacted a homeowner bill of rights similar to California's	1.8	\$465	\$ 837.00

2018-12-26	GAM	Continue research into class claims, including HOLA preemption, economic loss rule defenses, choice-of-law and UCL class cert, further HBOR research	6.8	\$720	\$ 4,896.00
2018-12-27	MLS	conf. call Team re potential class claims and legal research re same; e.g. homeowner bill of rights, negligence across various states, UDAP and wrongful foreclosure;	1	\$800	\$ 800.00
2018-12-27	GAM	Team call to discuss research findings, overview of potential claims and likely certification issues	1	\$720	\$ 720.00
2018-12-27	LPL	Conf. call with team re: status on researching causes of action, extension on clients' mediation deadline, and next steps	1	\$465	\$ 465.00
2018-12-27	LCF	Outline legal research regarding potential additional claims and assign tasks	1.1	\$425	\$ 467.50
2018-12-27	GAM	Research into potential unjust enrichment claim, choice-of-law issues	3.3	\$720	\$ 2,376.00
2018-12-28	GAM	Prepare summary of claims research for team	2.8	\$720	\$ 2,016.00
2018-12-28	GAM	Research into which states recognized negligence claims based on HAMP and which have rejected a duty	4.4	\$720	\$ 3,168.00
2018-12-31	GAM	Continue 50-state research, including on wrongful foreclosure, HBOR, UDAP, and negligence; research into potential approaches for certifying and managing small groups of states for multiple claims	7.1	\$720	\$ 5,112.00
2019-01-02	LPL	Review and analyze e-mail from G. Munroe re: analysis of viable claims for an amended complaint	0.4	\$465	\$ 186.00
2019-01-02	GAM	Continued research and analysis into certifying and managing multi-state classes under various theories	3.6	\$720	\$ 2,592.00
2019-01-03	AGS	Continue research on viable claims based on various state law	0.5	\$575	\$ 287.50

2019-01-03	GAM	Analysis and email re potential common causation issues and addressing through common expert proof	0.8	\$720	\$ 576.00
2019-01-04	GAM	Additional research into potential federal claims, including FDCRA / Rosenthal Act, TILA, and a further look at RESPA	2.8	\$720	\$ 2,016.00
2019-01-04	GAM	Research into potential of applying Iowa law to nationwide class, including lawchoice of law approach, Iowa UDAP exclusions, wrongful foreclosure claims, prior HAMP litigation in Iowa	3.3	\$720	\$ 2,376.00
2019-01-15	GAM	Research potential claims under Florida law (state with highest proportion of class members)	1.3	\$720	\$ 936.00
2019-01-17	GAM	Further research of Homeowners Bill of Rights-type laws in other states, emotional distress	0.8	\$720	\$ 576.00
2019-02-01	LCF	Call with co-counsel regarding research and tasks to be completed for First Amended Complaint, as well as outline of litigation strategy	0.8	\$425	\$ 340.00
2019-02-01	AGS	Conference call with co-counsel regarding status of case, discussions with opposing counsel, drafting new complaint, potential causes of action that can be brought individually and as a class	0.9	\$575	\$ 517.50
2019-02-01	MLS	conf. call re MTD and amending complaint; review emails from G. Munroe re r research on state claims and adding plaintiffs as class reps; tel. calls and emails re new clients; review WF Standards Report and email E. Gibbs and E. Epstein re same	3	\$800	\$ 2,400.00

2019-02-01	GAM	Conference call with team re amendment strategy; prepare and circulate summary of states to include in complaint with supporting numerosity case law; prepare and circulate rubric for researching state law; intentional tort research for complaint	5.4	\$720	\$ 3,888.00
2019-02-02	RMP	Review research on potential causes of action	0.2	\$725	\$ 145.00
2019-02-04	GAM	Call with MLS about additional time for amendment	0.2	\$720	\$ 144.00
2019-02-04	LPL	Call with G. Munroe re: legal research on potential state claims to plead in amended complaint	0.3	\$465	\$ 139.50
2019-02-05	GAM	Research for amended complaint, including further review of potential intentional torts	2.2	\$720	\$ 1,584.00
2019-02-05	LPL	Legal research re: whether New York law supports certain potential claims for the amended complaint	4.5	\$465	\$ 2,092.50
2019-02-06	LPL	Review and gather information on clients'/class members' states and other info relevant to amended complaint	0.4	\$465	\$ 186.00
2019-02-06	GAM	Call with team re plan for complaint, mediations	0.5	\$720	\$ 360.00
2019-02-06	MLS	Conf. call team re legal research for amending complaint	0.5	\$800	\$ 400.00
2019-02-06	LPL	Further legal research on potential NY state claims for amended complaint; e-mail to G. Munroe re: same	3.7	\$465	\$ 1,720.50
2019-02-06	GAM	Research for complaint, focusing on development of failure-of-oversight theory	6.8	\$720	\$ 4,896.00
2019-02-07	RMP	Research claims for Amended Complaint and potential class certification strategy	1.5	\$725	\$ 1,087.50
2019-02-07	LPL	Legal research on potential intentional infliction of emotional distress claims in NY	4.6	\$465	\$ 2,139.00
2019-02-07	GAM	Continued research for amended complaint, including intentional infliction of emotional distress and potential contract claims	6.6	\$720	\$ 4,752.00

2019-02-08	LPL	Call with G. Munroe re: results of legal research on New York's GBL statute and intentional infliction of emotional distress	0.2	\$465	\$ 93.00
2019-02-08	LPL	E-mails with G. Munroe and team re: ideas for potential contract claims to include in Plaintiffs' amended complaint	0.2	\$465	\$ 93.00
2019-02-08	RMP	Analyze potential claims	0.2	\$725	\$ 145.00
2019-02-08	MLS	Email G. Munroe re claims; tel. call R. Paul re claims and potential expanded class	0.5	\$800	\$ 400.00
2019-02-08	GAM	Continued research, thought, and discussions trying to develop contractual basis for recovery	8.2	\$720	\$ 5,904.00
2019-02-10	LPL	Legal research re: intentional infliction of emotional distress claims in New York; e-mail to G. Munroe re: same	1.1	\$465	\$ 511.50
2019-02-11	AGS	Case analysis on potential claims	0.2	\$575	\$ 115.00
2019-02-11	MLS	Legal research re Bristol Meyers/jurisdiction issue; tel. call R. Paul re same	1.5	\$800	\$ 1,200.00
2019-02-12	LCF	Continue to outline and analyze next steps regarding Amended Complaint, fact gathering regarding scope of Wells Fargo's error, and general litigation strategy, including correspondence with Gibbs Law Group to strategize regarding the same	1	\$425	\$ 425.00
2019-02-12	MLS	Conf. call team re claims research, amended complaint, client status and new error	1	\$800	\$ 800.00
2019-02-12	RMP	Analyze potential claims and class certification strategy	1	\$725	\$ 725.00
2019-02-12	LPL	Conf. call with team re: update on clients and plan for amended complaint	1.2	\$465	\$ 558.00
2019-02-12	GAM	Review Bristol Myers issue raised by co-counsel, call with team re same and other amended complaint issues, and follow-up email re state-law research	3.2	\$720	\$ 2,304.00
2019-02-13	RMP	Analyze claims	0.3	\$725	\$ 217.50
2019-02-13	GAM	Continue research and planning for amended complaint, including review of state law research from team	2.6	\$720	\$ 1,872.00

2019-02-13	LCF	Begin to research state specific laws regarding negligence, misrepresentation, unfair practices, and other potential claims against Wells Fargo, including research and outlining thoughts regarding potential claims under Maryland state law; begin to research and analyze potential claims for breach of fiduciary duties	5.2	\$425	\$ 2,210.00
2019-02-14	LCF	Continue to research state specific laws regarding negligence, misrepresentation, unfair practices, and other potential claims against Wells Fargo, including research and outlining thoughts regarding potential claims under New Jersey state law and begin to research claims under Pennsylvania state law	3.6	\$425	\$ 1,530.00
2019-02-14	GAM	Work on amended complaint	5.5	\$720	\$ 3,960.00
2019-02-15	LPL	Confer with J. Bloomfield re: whether client Emma White would be a good class rep for Florida	0.2	\$465	\$ 93.00
2019-02-15	MLS	Legal research re claims to add to amended complaint and re motion to transfer	1.5	\$800	\$ 1,200.00
2019-02-15	LCF	Continue to research state specific laws regarding negligence, misrepresentation, unfair practices, and other potential claims against Wells Fargo, including finish research and outlining thoughts regarding potential claims under Pennsylvania state law and begin to research and analyze potential claims under South Carolina state law	6.2	\$425	\$ 2,635.00
2019-02-15	GAM	Factual research for amended complaint, focusing on consent decrees and related documents; review New Jersey summary from L. Fellows and conduct additional research	6.7	\$720	\$ 4,824.00
2019-02-16	GAM	Draft amended complaint, focusing on consent orders	3.3	\$720	\$ 2,376.00

2019-02-17	GAM	Continued work on amended complaint; review Georgia summary and email re same	4.4	\$720	\$ 3,168.00
2019-02-17	LCF	Continue to research state specific laws regarding negligence, misrepresentation and other potential claims against Wells Fargo, including finish research and outlining thoughts regarding potential claims under South Carolina law and research and analyze relevant case law and outline thoughts regarding viability of potential claims under Georgia state law	5.5	\$425	\$ 2,337.50
2019-02-18	LPL	Review and analyze e-mails from G. Munroe and team re: WF's 2011 and 2016 consent orders mentioning loan modification software errors	0.2	\$465	\$ 93.00
2019-02-18	AGS	Client intake for potential class representatives	0.4	\$575	\$ 230.00
2019-02-18	JJB	Work on email memo re Ohio claims	0.7	\$580	\$ 406.00
2019-02-18	JJB	Research re Ohio claims in connection with first amended complaint	2.2	\$580	\$ 1,276.00
2019-02-18	LPL	Legal research re: whether there are viable state claims under Louisiana law	2.6	\$465	\$ 1,209.00
2019-02-18	LCF	Finish research of state specific laws regarding negligence, misrepresentation and other potential claims against Wells Fargo, including finish research and outlining thoughts regarding viability of potential claims under Texas law	2.8	\$425	\$ 1,190.00
2019-02-18	GAM	Continue work on amended complaint	5.8	\$720	\$ 4,176.00
2019-02-19	LPL	Call with client Emma White and Debora Granja re: being a named plaintiff in the amended complaint; e-mails with team re: same	0.5	\$465	\$ 232.50
2019-02-19	GAM	Review related complaint filed in Washington, analyze claims and send summary to team	0.8	\$720	\$ 576.00
2019-02-19	JJB	Finalize and distribute email memo re Ohio claims	0.8	\$580	\$ 464.00

2019-02-19	LCF	Analyze potential state class representatives and begin to contact clients regarding the same, including read and analyze notes from prior correspondence, outline thoughts regarding strength of potential representative(s); sent update to Mr. Bloomfield regarding the same	1.3	\$425	\$ 552.50
2019-02-19	JJB	Research re Ohio claims in connection with first amended complaint	3.4	\$580	\$ 1,972.00
2019-02-19	GAM	Continue drafting amended complaint	6.8	\$720	\$ 4,896.00
2019-02-20	LPL	E-mails with G. Munroe and team re: gathering detailed facts from named plaintiffs to include in amended complaint	0.2	\$465	\$ 93.00
2019-02-20	AGS	Review and analyze potential California class representation's facts and adequacy	0.3	\$575	\$ 172.50
2019-02-20	JJB	Draft email re status of class representatives for top 10 states	0.8	\$580	\$ 464.00
2019-02-20	LCF	Continue to work on obtaining state class representatives	1	\$425	\$ 425.00
2019-02-20	JJB	Draft fact sections of first amended complaint for class representatives	2.6	\$580	\$ 1,508.00
2019-02-20	LPL	Legal research re: potential state claims under Louisiana law	3.8	\$465	\$ 1,767.00
2019-02-20	GAM	Continue drafting amended complaint, including work on contract and IIED causes of action	6.7	\$720	\$ 4,824.00
2019-02-21	LPL	E-mails with team re: status on obtaining class representatives from all 10 states for amended complaint	0.2	\$465	\$ 93.00
2019-02-21	JJB	Draft email re status of class representatives for top 10 states	0.5	\$580	\$ 290.00

2019-02-21	LCF	Continue to work on obtaining potential state class representatives, including review and respond to correspondence from Mr. Bloomfield regarding status of the same and next steps; correspond with Ms. Wilson regarding serving as New York representative; review prior notes from prior correspondence with Ms. Wilson, outline additional information to obtain from Ms. Wilson and other state representatives for pleadings, draft follow-up correspondence to Ms. Wilson with specific questions regarding facts of her experience	2	\$425	\$ 850.00
2019-02-21	JJB	Draft fact sections of first amended complaint for class representatives	2.3	\$580	\$ 1,334.00
2019-02-21	LPL	Further legal research re: potential Louisiana state law claims; draft memo on the same for G. Munroe to use in drafting amended complaint	3.1	\$465	\$ 1,441.50
2019-02-21	GAM	Work on amended complaint, including IIED cause of action and negligence; review state law summaries and research FCRA for potential inclusion per EHG	6.8	\$720	\$ 4,896.00
2019-02-22	LCF	Continue to work on obtaining potential state class representatives, correspond with Mr. Bloomfield regarding next steps with respect to Louisiana representative	0.1	\$425	\$ 42.50
2019-02-22	JJB	Draft email re status of class representatives for top 10 states	0.4	\$580	\$ 232.00
2019-02-22	LPL	Calls with class reps to gather details on their facts for the amended complaint	0.6	\$465	\$ 279.00
2019-02-22	LPL	Draft (for amended complaint) facts section on Florida class representative Emma White; e-mail to G. Munroe re: same	0.6	\$465	\$ 279.00
2019-02-22	LCF	Work on first amended complaint and analyze venue discovery and supplemental briefing	0.7	\$425	\$ 297.50

2019-02-22	LPL	Conference call with team re: next steps for amended complaint, discovery on venue, and client mediations	0.7	\$465	\$ 325.50
2019-02-22	RMP	Work on Amended Complaint; evaluate class representatives; work on discovery	0.7	\$725	\$ 507.50
2019-02-22	MLS	Conf. call team re FAC , WA class action, mediations	0.8	\$800	\$ 640.00
2019-02-22	GAM	Team call re complaint progress	0.8	\$720	\$ 576.00
2019-02-22	JJB	Draft fact sections of first amended complaint for class representatives	1.9	\$580	\$ 1,102.00
2019-02-22	JJB	Calls and emails to prospective class representatives	2.1	\$580	\$ 1,218.00
2019-02-22	LPL	Continue drafting legal research memo on potential Louisiana state claims; e-mails with G. Munroe re: same	2.6	\$465	\$ 1,209.00
2019-02-22	GAM	Continue work on amended complaint, including wrongful foreclosure, HBOR, and UCL causes of action, analysis re difference in legal claims for GSE loans	5.8	\$720	\$ 4,176.00
2019-02-23	GAM	Continue drafting of amended complaint, focusing on state UDAP claims	5.3	\$720	\$ 3,816.00
2019-02-24	GAM	Continue drafting amended complaint, including finish of state UDAP claims, prayer, parties, choice of law, and class allegations	5.6	\$720	\$ 4,032.00
2019-02-25	LPL	Draft plaintiff-specific facts for California class rep D. Granja for amended complaint	0.6	\$465	\$ 279.00
2019-02-25	LPL	Calls with class reps Emma White and Debora Granja re: detailed facts on their WF experience for the complaint, and reviewing their documents	0.8	\$465	\$ 372.00
2019-02-25	MLS	Review prior consent orders re WF loss mitigation issues	0.8	\$800	\$ 640.00

2019-02-25	LCF	Continue to work on gathering and summarizing information for state class representative; summarizes facts for New York, Pennsylvania, and Louisiana reps and send to Mr. Munroe; correspond with potential Louisiana representative, including review notes from prior correspondence and outline fact questions; draft follow-up correspondence to Pennsylvania representative outlining additional questions and confirming facts; review response and summarize same for Mr. Munroe; correspond with New York representative regarding receipt of additional information	2.2	\$425	\$ 935.00
2019-02-25	GAM	Draft introduction to complaint, full revision of allegations, add in WFC consent order; review initial class rep summaries and emails with L. Lam and JJB re same; circulate draft complaint for review	9.9	\$720	\$ 7,128.00
2019-02-26	LPL	Review and analyze named plaintiff Emma White's loan-related documents; e-mails with G. Munroe re: same	0.6	\$465	\$ 279.00
2019-02-26	LPL	Review and analyze named plaintiff Debora Granja's loan-related documents; e-mails with G. Munroe re: same	0.7	\$465	\$ 325.50
2019-02-26	LPL	Review and analyze G. Munroe's draft of first amended complaint; e-mails with G. Munroe re: same	1.2	\$465	\$ 558.00
2019-02-26	LCF	Begin to review and analyze draft of First Amended Complaint; correspond with Mr. Munroe regarding questions for specific state plaintiffs, draft responses to the same	2	\$425	\$ 850.00
2019-02-26	MLS	Review/edit FAC; draft email to Team re same; emails J. Bloomfield re FAC and mediation	2	\$800	\$ 1,600.00

2019-02-26	GAM	Work with JJB, LL, and LF to prepare class rep experience sections of complaint; review and address MLS comments on complaint; circulate current version and agenda of outstanding items to address	7.1	\$720	\$ 5,112.00
2019-02-27	LPL	Conf. call with team re: finalizing the amended complaint and plan for Michaela Christian's mediation tomorrow	0.3	\$465	\$ 139.50
2019-02-27	LCF	Work on finalizing First Amended Complaint	0.3	\$425	\$ 127.50
2019-02-27	LPL	Meeting with M. Schrag and J. Bloomfield re: steps for finalizing amended complaint and getting class rep sign-off on it	0.3	\$465	\$ 139.50
2019-02-27	LPL	E-mails and calls with named plaintiffs re: reviewing the amended complaint and getting their permission to file tomorrow	0.3	\$465	\$ 139.50
2019-02-27	LPL	E-mails with G. Munroe and J. Bloomfield re: additional facts to include in the amended complaint	0.4	\$465	\$ 186.00
2019-02-27	JJB	Call with co-counsel	0.5	\$580	\$ 290.00
2019-02-27	RMP	Draft Amended Complaint; work on case strategy	1.4	\$725	\$ 1,015.00
2019-02-27	MLS	Review/edit FAC; tel call G. Munroe re same	1.8	\$800	\$ 1,440.00
2019-02-27	LPL	Review and help finalized amended class action complaint	2.4	\$465	\$ 1,116.00
2019-02-27	JJB	Review and analyze draft first amended complaint	2.7	\$580	\$ 1,566.00

2019-02-27	LCF	Continue to work on gathering facts relevant to claims of state class representatives for Pennsylvania and New York, including research relevant foreclosure and other litigation on Westlaw dockets, correspondence with both regarding additional questions/clarification of facts, summarize and send additional information to Mr. Munroe; review and respond to potential class member inquiries regarding class action generally	3.8	\$425	\$ 1,615.00
2019-02-27	GAM	Work with LF and JJB to add more class rep experiences to complaint, update complaint to add IIED class; discuss GSE vs non-GSE issue with team	8.5	\$720	\$ 6,120.00
2019-02-28	LCF	Send final draft of amended complaint to representatives for New York and Pennsylvania for review including draft cover email outlining scope of review	0.2	\$425	\$ 85.00
2019-02-28	AGS	Revise amended complaint	0.3	\$575	\$ 172.50
2019-02-28	LPL	Call with named plaintiff Debora Granja re: edits to first amended complaint	0.3	\$465	\$ 139.50
2019-02-28	LCF	Correspond with co-counsel to finalize First Amended Complaint, continue to refine litigation strategy and next steps with respect to discovery and mediations	0.5	\$425	\$ 212.50
2019-02-28	LPL	E-mails with G. Munroe and J. Bloomfield re: finalizing the amended class action complaint	0.6	\$465	\$ 279.00
2019-02-28	JJB	Review, proofread and edit final draft of first amended complaint	1.6	\$580	\$ 928.00

2019-02-28	LCF	Continue to work on First Amended Complaint, including assist with finalizing relevant fact section for New York representative, review documents and additional information from Ms. Wilson and correspond with Ms. Wilson to confirm facts for the same, outline facts learned and summary of documents from Ms. Wilson, send revised facts and proposed draft to Mr. Munroe; review and proofread final draft of First Amended Complaint, send edits to the same to Ms. Lam	2.5	\$425	\$ 1,062.50
2019-02-28	RMP	Draft Amended Complaint	3.3	\$725	\$ 2,392.50
2019-02-28	MLS	Work on FAC; conf. call Team re same; finalize FAC for filing;	3.8	\$800	\$ 3,040.00
2019-02-28	LPL	Review, edit, finalize, and supervise filing of first amended class action complaint	4.5	\$465	\$ 2,092.50
2019-02-28	GAM	Finalize amended complaint for filing, including working with JJB and LF to incorporate final class rep sections, revisions to complaint to incorporate team and client edits, coordinate filing	7.7	\$720	\$ 5,544.00
2019-03-01	LPL	Research on proper service and prepare proposed summons for new defendant Wells Fargo & Company; file proposed summons	0.6	\$465	\$ 279.00
2019-03-04	LPL	Research on waiver of service of summons for new defendant Wells Fargo & Company; prepare waiver and cover e-mail to send to defense counsel	0.4	\$465	\$ 186.00
2019-03-08	LPL	E-mails with defense counsel re: waiver of service of summons on behalf of Wells Fargo & Company, and service of all initiating documents	0.3	\$465	\$ 139.50
2019-03-11	LPL	E-mails with M. Fogle and defense counsel re: filing Wells Fargo & Company's waiver of service of summons	0.2	\$465	\$ 93.00

2019-03-19	LCF	Review Order granting stipulation of time regarding responsive pleadings and hearing on Motion to Dismiss	0.1	\$425	\$ 42.50
		Project Total:	345.5		\$ 220,777.00
Project: Motion to transfer venue					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-01-01	RMP	Review and analyze motion to transfer; prepare for conference call with opposing counsel; conference call with opposing counsel	1.1	\$725	\$ 797.50
2019-01-01	MLS	Review motion to transfer; tel. call R. Paul re same; Tel. call A. Groves and R. Paul re mediation process, and transfer motion	1.3	\$800	\$ 1,040.00
2019-01-02	GAM	Call with MLS re his meeting with opposing counsel, potential approaches to motion to transfer	0.3	\$720	\$ 216.00
2019-01-02	GAM	Initial review of WF's motion to transfer	0.4	\$720	\$ 288.00
2019-01-02	LCF	Review Wells Fargo Motion to Transfer and outline thoughts regarding potential response to the same	0.4	\$425	\$ 170.00
2019-01-02	LPL	Confer with M. Schrag and J. Bloomfield re: meet and confer with defense counsel about mediation plan and venue motion	0.4	\$465	\$ 186.00
2019-01-02	GAM	Call with team re motion to transfer filed by WF, status conference strategy	0.8	\$720	\$ 576.00
2019-01-02	MLS	Review transfer motion, declaration	1	\$800	\$ 800.00
2019-01-02	AB	Research what conduct emanated from San Francisco vs. Iowa at request of M. Schrag, including where Wells Fargo compliance department is based, in response to Wells Fargo's motion to transfer to Iowa.	1.4	\$430	\$ 602.00
2019-01-02	GAM	Research into Alsup and ND Cal cases on venue transfer and voluntary dismissal	2.2	\$720	\$ 1,584.00
2019-01-03	LCF	Continue to analyze potential response to Motion to Transfer	0.3	\$425	\$ 127.50

2019-01-03	GAM	Calls with EHG and MLS re status conference hearing, effect on handling of venue motion, potential 23g motion and other case management approaches	0.4	\$720	\$ 288.00
2019-01-03	MLS	Discuss response to transfer motion w/ R. Paul and E. Gibbs; emails and tel. calls G. Munroe re above; conf. A. Mura re same	0.8	\$800	\$ 640.00
2019-01-03	GAM	Research transfer of venue response	1.2	\$720	\$ 864.00
2019-01-04	RMP	Analyze strategy regarding motion to transfer	0.4	\$725	\$ 290.00
2019-01-04	LCF	Begin to research response to Motion to Transfer, including potential defenses to arguments raised in the same	0.5	\$425	\$ 212.50
2019-01-08	AB	Research potential additional support for N.D. Cal. venue.	1.4	\$430	\$ 602.00
2019-01-08	GAM	Call with A. Blumenthal re his research and findings tying Wells Fargo to California when preparing the complaint; review materials from AB, searches re consent orders for potential ties and witnesses likely to be responsible for auditing, emails with AB re same	3.3	\$720	\$ 2,376.00
2019-01-08	GAM	Begin work on opposing WF's motion to transfer, including review of motion and relevant case law, searches for public policy argument, preliminary outlining	4.4	\$720	\$ 3,168.00
2019-01-08	LCF	Work on Opposition to Motion to Transfer, including review and analyze Wells Fargo's Motion, read cases cited by Wells Fargo, research other cases from Judge Alsup regarding transfer and begin to outline and draft Opposition; correspond with co-counsel regarding status of his research and exchange research conducted	4.4	\$425	\$ 1,870.00
2019-01-09	GAM	Work on opp to transfer motion, including review of Young docket for briefing in that case, MDL congestion stats	2.4	\$720	\$ 1,728.00

2019-01-10	GAM	Continue work on opposition to motion to transfer, including extensive research into composition and locations of oversight committees	6.9	\$720	\$ 4,968.00
2019-01-11	GAM	Call with team re status of class member inquiries, response to motion to transfer	0.2	\$720	\$ 144.00
2019-01-11	LPL	Conf. call with team re: how to handle incoming calls from class members and motion to transfer venue	0.2	\$465	\$ 93.00
2019-01-11	RMP	Work on opposition to motion to transfer; phone conference with opposing counsel regarding letters and transfer motion	0.7	\$725	\$ 507.50
2019-01-11	LCF	Strategize regarding next steps to finalize Opposition to Motion to Transfer	3	\$425	\$ 1,275.00
2019-01-11	GAM	Continue work on opposition to transfer motion	4.8	\$720	\$ 3,456.00
2019-01-12	GAM	Draft opposition to motion to transfer	8.3	\$720	\$ 5,976.00
2019-01-13	MLS	Review/edit opp. to mot. to transfer	0.8	\$800	\$ 640.00
2019-01-13	GAM	Complete draft of opposition to transfer motion, edit and circulate to team for review	7.1	\$720	\$ 5,112.00
2019-01-14	LCF	Review draft Opposition to Motion to Transfer and propose edits to the same	0.2	\$425	\$ 85.00
2019-01-14	AGS	Review opposition to motion to transfer; provide comments	0.4	\$575	\$ 230.00
2019-01-14	LPL	Review and edit draft of opp. to motion to transfer venue	0.4	\$465	\$ 186.00
2019-01-14	RMP	Draft opposition to motion to transfer	1	\$725	\$ 725.00
2019-01-14	MLS	Work on opp. to motion to transfer; review exhibits; conf. G. Munroe re same; tel. call R. Paul re same; finalize for filing	4.5	\$800	\$ 3,600.00

2019-01-14	GAM	Finalize Opp to Motion to Transfer: calls and emails with MLS re overall motion and supporting evidence, his suggested changes; review and implement suggested edits and comments from team members; review state-level breakdown provided by WF and integrate into brief; prepare supporting declaration and exhibits; coordinate with team re filing	8.4	\$720	\$ 6,048.00
2019-01-22	GAM	Review Wells Fargo's reply iso transfer, identify points for oral argument	0.5	\$720	\$ 360.00
2019-01-23	RMP	Review reply in support of motion to transfer	0.2	\$725	\$ 145.00
2019-01-23	MLS	Review reply to transfer motion	0.5	\$800	\$ 400.00
2019-01-24	LCF	Review Wells Fargo's Reply in Support of Transfer and outline thoughts regarding any follow-up needed	0.2	\$425	\$ 85.00
2019-01-24	LPL	Review and analyze reply brief ISO Defendant's motion to transfer venue	0.3	\$465	\$ 139.50
2019-02-18	RMP	Prepare for hearing on motion to transfer venue	0.6	\$725	\$ 435.00
2019-02-18	MLS	Prepare for motion to transfer argument--review filings and outline argument points; review/approve doc retention letter	3.7	\$800	\$ 2,960.00
2019-02-19	RMP	Prepare for hearing on motion to transfer venue	0.5	\$725	\$ 362.50
2019-02-19	GAM	Calls with MLS to help prepare for transfer motion hearing	0.8	\$720	\$ 576.00
2019-02-19	MLS	Prepare for motion to transfer hearing; tel. call G. Munroe re same	2.3	\$800	\$ 1,840.00
2019-02-20	GAM	Call with MLS to help prepare for transfer motion hearing, follow-up email	0.6	\$720	\$ 432.00

2019-02-20	MLS	Prepare for motion to transfer hearing--draft outline, review briefs and cases; conf. R. Paul re same; meet w/ E. Gibbs and R. Paul re motion to transfer, filing new action, drafting 23G papers, new class of injured borrowers; discuss E.D. WA complaint and emails re same	5.5	\$800	\$ 4,400.00
2019-02-20	RMP	Prepare for court hearing on motion to transfer venue and travel from Kansas City to San Francisco for court hearing	9.5	\$725	\$ 6,887.50
2019-02-21	LCF	Review Order from hearing on Motion to Transfer: begin to outline and analyze potential next steps in light of Court's Order, including begin to analyze strategy regarding completing venue discovery	0.5	\$425	\$ 212.50
2019-02-21	LPL	Confer with M. Schrag, E. Gibbs, and D. Hughes re: how the hearing on the motion to transfer went, and conducting discovery on venue ordered by Judge Alsup	0.5	\$465	\$ 232.50
2019-02-21	GAM	Discuss motion to transfer hearing with MLS, review order and email re same	0.6	\$720	\$ 432.00
2019-02-21	MLS	Prepare for motion to transfer hearing; Hearing on Motion to transfer; meeting w/ R. Paul and J. Bloomfield post-hearing; conf. E. Gibbs and D. Hughes re hearing and deposition strategy	4	\$800	\$ 3,200.00
2019-02-21	RMP	Prepare for and attend hearing on motion to transfer venue; meet-and-confer with opposing counsel regarding Rule 26(f) and venue depositions; draft discovery; review court orders	5.2	\$725	\$ 3,770.00
2019-03-04	KDJ	Draft notice of deposition and two subpoenas for witnesses per court order on motion to transfer	0.4	\$250	\$ 100.00
2019-03-07	LPL	Confer with M. Schrag and G. Munroe re: how to approach venue-related discovery depositions	0.2	\$465	\$ 93.00
2019-03-07	LPL	Review and analyze transcript for motion to transfer hearing, and Judge Alsup ordering early venue-related discovery	0.4	\$465	\$ 186.00

2019-03-07	GAM	Discussions re venue discovery with MLS and LL, review hearing transcript on venue motion	1.2	\$720	\$ 864.00
2019-03-12	JJB	Review and analyze notice of withdrawal of motion to transfer venue	0.4	\$580	\$ 232.00
2019-03-12	MLS	Conf. E. Gibbs re motion to transfer, discovery and mediation strategy; conf. R. Paul re same	0.7	\$800	\$ 560.00
		Project Total:	115		\$ 80,375.50
Project: Response to motion to dismiss original complaint					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-12-19	MLS	Tel. calls and emails with Def. counsel re deadline to respond to complaint and meet/confer before 1/3 hearing; conf. call Team re researching class/damages issues before 1/3 hearing and also new claims to add to amended complaint;	2.2	\$800	\$ 1,760.00
2019-01-31	GAM	Review WF's motion to dismiss, calls with MLS to discuss impressions and plans/schedule to amend	0.9	\$720	\$ 648.00
2019-01-31	MLS	Review MTD; tel call G. Munroe re same	1.8	\$800	\$ 1,440.00
2019-02-01	LPL	Review and analyze Wells Fargo's motion to dismiss initial complaint	0.5	\$465	\$ 232.50
2019-02-04	LPL	Draft stipulation and proposed order for extension of time on Plaintiffs' response to opp. to motion to dismiss; confer with M. Schrag re: same	1.2	\$465	\$ 558.00
2019-02-05	LPL	Draft declaration and proposed order for stipulation on extension of time to respond to WF's motion to dismiss	0.4	\$465	\$ 186.00
2019-02-06	MLS	Work on stip to extend schedule; draft email to A. Groves re schedule and non-compliant letters	0.5	\$800	\$ 400.00
2019-02-07	MLS	Emails w/ def. counsel re stip/extensions; draft stip; conf. L. Lam re same	0.3	\$800	\$ 240.00
2019-02-07	LPL	Edits to stipulation, declaration, and proposed order regarding schedule for amended complaint and motion to dismiss	0.7	\$465	\$ 325.50
		Project Total:	8.5		\$ 5,790.00

Project: Rule 26 initial disclosures					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-01-11	RPN	Draft initial disclosures	1.3	\$230	\$ 299.00
2019-02-06	LPL	Research Rule 26 disclosure requirements in Judge Alsup's court, and when we can begin discovery and serve initial disclosures; confer with M. Schrag on proposed plan for getting early discovery	0.9	\$465	\$ 418.50
2019-02-15	RMP	Draft written discovery and initial disclosures	0.2	\$725	\$ 145.00
2019-03-05	LCF	Finish analysis of upcoming deadlines, including review Court Order setting deadlines, draft outline of upcoming tasks to be completed with respect to Rule 26 disclosures and scheduling order, circulate thoughts regarding the same	0.6	\$425	\$ 255.00
2019-03-06	LCF	Correspond with co-counsel to outline status of Rule 26 disclosures and scheduling order, including next steps to finalize the same	0.3	\$425	\$ 127.50
2019-03-06	LPL	E-mails with team and named plaintiffs re: getting documents from named plaintiffs to produce when we produce initial disclosures	0.8	\$465	\$ 372.00
2019-03-06	LCF	Draft proposed template of Rule 26 disclosures for named plaintiffs, circulate draft to team for review/edits	1	\$425	\$ 425.00

2019-03-07	LCF	Work on upcoming Rule 26 disclosures and document production, including review documents received from Brenda and Russell Simoneaux, Rose Wilson, and Cyndi and George Floyd, correspond with all three to confirm receipt of documents and to confirm they will search for any additional documents to prepare for upcoming Rule 26 disclosure deadline; correspond with Ms. Lam and Mr. Blumenthal regarding process and tasks to finalize for Rule 26 disclosure deadline, including outline thoughts regarding privilege log and bates labeling	1.4	\$425	\$ 595.00
2019-03-08	LCF	Review documents for upcoming Rule 26 production	0.2	\$425	\$ 85.00
2019-03-08	LPL	Meeting with J. Bloomfield and M. Schrag re: next steps on initial disclosures, gathering documents from class representatives, and upcoming mediations	0.4	\$465	\$ 186.00
2019-03-11	LCF	Continue to work on discovery and Rule 26 disclosures to finalize for Thursday's disclosure deadline; correspond with Ms. Lam regarding the same	0.2	\$425	\$ 85.00
2019-03-11	LPL	Review and analyze current draft of Plaintiffs' initial disclosures; confer with J. Bloomfield re: plan for completing the same	0.9	\$465	\$ 418.50
2019-03-12	MLS	Emails re disclosures	0.3	\$800	\$ 240.00
2019-03-12	LPL	E-mails and call with named plaintiffs Granja and White re: searching for documents to produce with Plaintiffs' initial disclosures	0.4	\$465	\$ 186.00
2019-03-12	JJB	Review draft initial disclosures	0.8	\$580	\$ 464.00
2019-03-12	LPL	Edits to Plaintiffs' initial disclosures; e-mail to M. Schrag re: same	1.4	\$465	\$ 651.00
2019-03-13	LCF	Continue to work on Rule 26 disclosures, including correspond with Ms. Lam regarding status of the same	0.1	\$425	\$ 42.50

2019-03-16	JJB	Compile and review documents received from class representatives and forward to M. Fogle for production	3.5	\$580	\$ 2,030.00
2019-03-18	LPL	E-mails with J. Bloomfield re: gathering documents from class reps to produce with initial disclosures	0.2	\$465	\$ 93.00
2019-03-19	LPL	E-mail to M. Schrag re: summary of today's team call on next steps in the case, including CMC and initial disclosures	0.2	\$465	\$ 93.00
2019-03-19	LPL	E-mails to class reps to follow up with them on producing documents with Plaintiffs' initial disclosures	0.4	\$465	\$ 186.00
2019-03-19	LCF	Continue to work on draft of Initial Rule 26 Disclosures, including begin to review proposed changes from Ms. Lam	0.5	\$425	\$ 212.50
2019-03-19	MLS	Review/edit initial disclosures	0.7	\$800	\$ 560.00
2019-03-19	LPL	Review documents being produced by named plaintiffs with initial disclosures	0.8	\$465	\$ 372.00
2019-03-19	LPL	Conf. call with team re: next steps in the case, initial disclosures, venue-related documents, tolling agreements, and discovery to be served	0.9	\$465	\$ 418.50
2019-03-19	LPL	Edits to Plaintiffs' initial disclosures	1.5	\$465	\$ 697.50
2019-03-20	LCF	Continue to work on draft initial R26 Disclosures, including finish review and edits of revised draft from co-counsel, review documents received from three named plaintiffs and draft summaries of the same for draft disclosures, circulate revised draft	1.1	\$425	\$ 467.50
2019-03-20	LPL	Review and process named plaintiffs' documents to produce with initial disclosures	2.9	\$465	\$ 1,348.50
2019-03-21	AGS	Revise Initial Disclosures; review Wells Fargo initial disclosures	0.5	\$575	\$ 287.50
2019-03-21	LCF	Assist with finalizing initial R26 Disclosures, including review documents received from additional named plaintiffs and draft summaries of the same for draft disclosures	0.9	\$425	\$ 382.50

2019-03-21	LPL	Edit, finalize, and produce Plaintiffs' initial disclosures	1.9	\$465	\$ 883.50
2019-03-21	LPL	Review and analyze named plaintiffs' documents to produce with initial disclosures	6.4	\$465	\$ 2,976.00
2019-03-22	RMP	Review initial disclosures	0.1	\$725	\$ 72.50
2019-03-25	LPL	E-mail to client Demartino re: producing documents with initial disclosures	0.1	\$465	\$ 46.50
2019-03-26	MLS	Review initial disclosures and CMC statement re status conf. prep; emails def. counsel re meeting/confer on schedule; review emails re scope of class and discuss w/ L. Lam	1	\$800	\$ 800.00
2019-03-29	LPL	Review and produce Emma White's documents for Plaintiffs' initial disclosures	0.7	\$465	\$ 325.50
2019-04-02	LPL	E-mail to team re: the CMO's deadline for initial disclosures on 4/5	0.2	\$465	\$ 93.00
2019-04-03	LPL	Call with co-counsel A. Schwarz re: whether Plaintiffs should supplement their initial disclosures on damages; e-mail to team re: same	0.3	\$465	\$ 139.50
2019-04-08	AGS	Review Wells Fargo's Amended Initial Disclosures	0.1	\$575	\$ 57.50
2019-04-10	JJB	Review and analyze supplemental initial disclosures from Wells Fargo	1.2	\$580	\$ 696.00
2019-04-26	AGS	Review Wells Fargo's initial disclosures	0.2	\$575	\$ 115.00
2019-07-24	MLS	Emails re disclosure updates	0.3	\$800	\$ 240.00
2019-07-25	LPL	Work on supplementing initial disclosures with additional damages information	0.2	\$465	\$ 93.00
2019-07-26	LCF	Assist with Amended Rule 26 disclosures, including locate and summarize plaintiff specific damage information for Mr. Frye, Mr. and Mrs. Floyd, Mrs. Wilson, and Mr. and Mrs. Simoneaux to be incorporated into Supplemental Rule 26 disclosures	0.4	\$425	\$ 170.00
2019-12-06	LPL	Confer with M. Schrag re: amending Plaintiffs' initial disclosures	0.2	\$465	\$ 93.00

2019-12-06	MLS	Review disclosures; discuss depo dates w/ R. Paul, L. Lam and J. Bloomfield; review WF letter re close of discovery; discuss same L. Lam	1.2	\$800	\$ 960.00
2019-12-10	LPL	Work on amending Plaintiffs' initial disclosures	1.4	\$465	\$ 651.00
2019-12-14	LPL	Confer with N. Shah re: gathering information on Plaintiffs' damages to supplement initial disclosures	0.4	\$465	\$ 186.00
2019-12-16	LPL	Confer with M. Schrag and N. Shah re: supplementing Plaintiffs' initial disclosures	0.6	\$465	\$ 279.00
2019-12-16	NS	Drafting second amended disclosures	1.1	\$415	\$ 456.50
2019-12-17	NS	Continued drafting second amended disclosures	6.4	\$415	\$ 2,656.00
2019-12-18	LPL	Edit and finalize Plaintiffs' second amended initial disclosures	0.8	\$465	\$ 372.00
2019-12-18	LCF	Review and provide edits/feedback to final draft of supplemental Rule 26 disclosures	2.8	\$425	\$ 1,190.00
		Project Total:	53.3		\$ 25,695.00
Project: Rule 26(f) report and case management conference					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-12-12	RMP	Review court order; analyze case strategy; work on Joint Case Management Statement; review local rules	2.8	\$725	\$ 2,030.00
2018-12-17	LCF	Review and analyze case management order to confirm dates correctly calendared, including review local rules regarding the same	0.2	\$425	\$ 85.00
2018-12-27	RMP	Review correspondence from potential client; prepare joint case management conference statement; analyze potential claims	0.8	\$725	\$ 580.00
2019-01-08	RMP	Prepare Case Management Statement; analyze case strategy; work on script for potential client calls; phone call with opposing counsel regarding letter	0.8	\$725	\$ 580.00
2019-01-10	RMP	Prepare draft Case Management Statement	0.7	\$725	\$ 507.50

2019-02-06	LPL	E-mails with M. Schrag re: examples of Rule 26(f) reports and CMC statements in N.D. Cal.	0.1	\$465	\$ 46.50
2019-02-06	RMP	Analyze issues and scheduling for complaint, discovery, and Case Management Conference Statement	0.7	\$725	\$ 507.50
2019-02-06	LPL	Conf. call with team re: CMC, upcoming mediations and plan for amended complaint	0.7	\$465	\$ 325.50
2019-02-14	MLS	Conf. call R. Paul, A. Schwartz and J. Bloomfield re CMC statement and plan for meet/confer; review standing order re same and ESI; conf. J. Bloomfield re client doc retention; review client emails	0.7	\$800	\$ 560.00
2019-02-14	RMP	Draft Case Management Statement	1.8	\$725	\$ 1,305.00
2019-02-15	LCF	Continue to outline and analyze next steps, including potential next steps regarding Rule 26 meeting and disclosure(s), draft discovery to Wells Fargo, and scheduling order	0.2	\$425	\$ 85.00
2019-02-18	RMP	Prepare Case Management Statement	0.5	\$725	\$ 362.50
2019-02-19	MLS	Review/edit draft joint CMC statement	0.5	\$800	\$ 400.00
2019-02-20	LCF	Receive update regarding anticipated strategy with respect to Rule 26 conference and hearing on Motion to Transfer tomorrow	0.4	\$425	\$ 170.00
2019-02-20	RMP	Draft proposed Case Management Statement	0.8	\$725	\$ 580.00
2019-02-21	MLS	Meet/Confer w/ def. counsel re Joint CMC statement and Rule 26 f topics	0.8	\$800	\$ 640.00
2019-03-01	RMP	Work on Case Management Statement and subpoenas to witnesses	0.4	\$725	\$ 290.00
2019-03-05	MLS	Review/respond L. Fellows email re joint cmc, rule 26f report and initial disclosures	0.3	\$800	\$ 240.00
2019-03-05	LPL	E-mails with M. Schrag and co-counsel re: preparing joint case management statement and Rule 26(f) report; find sample N.D. Cal. CMC to send around to team	0.5	\$465	\$ 232.50

2019-03-06	LPL	Conf. call with M. Schrag, J. Bloomfield, and team re: completing joint case management statement, initial disclosures, and upcoming mediation	0.2	\$465	\$ 93.00
2019-03-06	LPL	Review and analyze co-counsel's draft of joint case management statement	0.3	\$465	\$ 139.50
2019-03-06	RMP	Work on case strategy, including Case Management Statement and Discovery Plan	0.6	\$725	\$ 435.00
2019-03-06	MLS	Review/edit CMC statement; email A. Groves re further meet/confer and ADR issue; conf. call Team re joint cmc statement, initial disclosures and mediations	1.3	\$800	\$ 1,040.00
2019-03-06	LCF	Continue to work on draft Joint Case Management Statement and Discovery Plan, including revise draft in light of filing of First Amended Complaint, add/merge Rule 26(f) add draft discovery plan provisions, analyze local rule and Judge Alsup's standing order to confirm all required provisions added, proofread final draft and circulate to co-counsel for further review/edits	4.2	\$425	\$ 1,785.00
2019-03-07	LPL	Confer with M. Schrag and co-counsel re: ADR meet-and-confer requirements with defense counsel	0.2	\$465	\$ 93.00
2019-03-07	RMP	Review correspondence regarding mediation strategy and with opposing counsel regarding Alternative Dispute Resolution certification	0.3	\$725	\$ 217.50
2019-03-07	JJB	Prepare ADR certification for filing	0.4	\$580	\$ 232.00
2019-03-07	MLS	Conf. G. Munroe and L. Lam re case status; conf. L. Lam re ADR certificate and review local rules and ADR handbook; emails def. counsel re same; work on joint cmc statement	2.3	\$800	\$ 1,840.00
2019-03-08	LPL	Edits to joint case management statement	0.8	\$465	\$ 372.00
2019-03-08	MLS	Work on CMC statement; conf. call Team re cmc statement, 26f , and mediations	1	\$800	\$ 800.00

2019-03-10	RMP	Draft proposed Case Management Statement	0.9	\$725	\$ 652.50
2019-03-11	JJB	Call with co-counsel re CMC statement	0.5	\$580	\$ 290.00
2019-03-11	LPL	Conference call with defense counsel and team re: joint case management statement and Rule 26(f) requirements	0.5	\$465	\$ 232.50
2019-03-11	RMP	Supplemental Rule 26(f) meeting with opposing counsel	0.5	\$725	\$ 362.50
2019-03-11	MLS	Work on draft cmc statement; review R. Paul edits; meet/confer def. counsel re joint cmc statement, motion to transfer and rule 26f; conf. L. Lam re same; emails R. Paul re same	1.8	\$800	\$ 1,440.00
2019-03-12	MLS	Review/edit CMC statement	0.5	\$800	\$ 400.00
2019-03-13	RMP	Conference call with opposing counsel to discuss Case Management Statement; analyze discovery strategy	0.4	\$725	\$ 290.00
2019-03-13	LPL	Edits to joint case management statement; call with G. Munroe and M. Schrag re: same	0.9	\$465	\$ 418.50
2019-03-13	LCF	Continue to work on upcoming discovery deadlines and overall case strategy regarding Joint Case Management Statement, discovery issues, and presence of other cases, including call with co-counsel regarding the same; outline thoughts and next steps	1.2	\$425	\$ 510.00
2019-03-13	MLS	Work on cmc statement; conf. G. Munroe re same; emails re schedule proposed by WF; meet/confer WF counsel re cmc statement and mediation protocol	2.2	\$800	\$ 1,760.00
2019-03-13	GAM	Review Wells Fargo's sections from joint case mgmt statement; email and call with MLS and LL re strategy for revision; draft fact statement for our section and confer with team re same	3.4	\$720	\$ 2,448.00
2019-03-14	GAM	Review Wells Fargo revisions to joint CMC statement and confer with team re various sections of CMC statement	0.3	\$720	\$ 216.00
2019-03-14	RMP	Work on Case Management Statement	0.7	\$725	\$ 507.50

2019-03-14	LCF	Assist with finalizing Joint Case Management Statement, including review revised draft from co-counsel and outline thoughts and changes to the same, analyze proposed discovery schedule and outline alternative dates, correspond with Ms. Lam regarding changes to the proposed discovery schedule and proposed alternate dates, review multiple emails with Wells Fargo's counsel regarding proposed changes and final draft of Joint Statement	1.5	\$425	\$ 637.50
2019-03-14	MLS	Work on cmc statement; tel. calls and emails L. Lam re same	1.5	\$800	\$ 1,200.00
2019-03-14	LPL	Review and edit latest draft of joint case management statement; calls with M. Schrag re: same; finalize for filing	2.9	\$465	\$ 1,348.50
2019-03-19	LCF	Call with co-counsel regarding various discovery issues and case strategy, including mediation status and upcoming Case Management Conference statement	0.8	\$425	\$ 340.00
2019-03-26	LCF	Work on preparations for upcoming case management conference	0.4	\$425	\$ 170.00
2019-03-26	LPL	Conf. call with team re: update on mediations, upcoming CMC with Judge Alsup, and other next steps in the case	0.6	\$465	\$ 279.00
2019-03-27	GAM	Call with MLS in preparation for status conference	0.6	\$720	\$ 432.00
2019-03-27	JJB	Prepare for initial case management conference	1.7	\$580	\$ 986.00
2019-03-27	AGS	Travel to San Francisco from Kansas City for Case Management Conference (extended due to weather delays in Minneapolis)	6.3	\$575	\$ 3,622.50
2019-03-28	RMP	Review proposals for scheduling and ultimate scheduling order	0.2	\$725	\$ 145.00
2019-03-28	LPL	Conf. call with M. Schrag, co-counsel, and defense counsel re: coordinating discovery in our case and Keller's case, and other issues in CMC statement	0.6	\$465	\$ 279.00

2019-03-28	JJB	Attend case management conference	2.8	\$580	\$ 1,624.00
2019-03-28	AGS	Prepare for Case Management Conference; work on bankruptcy issues for class representative; conference call with opposing counsel regarding deadlines, tolling for individual claims, and other issues to be addressed at Case Management Conference; attend Case Management Conference; follow up post-hearing regarding deadlines and new assignments, case strategy given the tightened timeline pre-trial	4	\$575	\$ 2,300.00
2019-03-28	MLS	Prep for CMC; meet A. Schwartz and E. Gibbs re mediations and cmc; review complaint, cmc statement; conf. G. munroe re same; Meet and confer and defense counsel re coordinating discovery, GSE nonclass members and scheduling; attend CMC; conf. A. Schwartz, J. Bloomfield after CMC; emails E. Gibbs and tel. Call D. Loesser re CMC	4.2	\$800	\$ 3,360.00
2019-03-29	LPL	Confer with M. Schrag re: case schedule and how case management conference went	0.2	\$465	\$ 93.00
2019-03-29	AGS	Return travel from San Francisco to Kansas City; work on case schedule for discovery	6.9	\$575	\$ 3,967.50
2019-03-30	LCF	Review Judge Alsup's Order setting trial date and deadline to file class certification	0.1	\$425	\$ 42.50
2019-03-31	LCF	Outlined case deadlines pursuant to Judge Alsup's oral ruling at Case Management Conference; calculated relevant opposition and reply deadlines	0.2	\$425	\$ 85.00
2019-04-01	LCF	Review Judge Alsup's final, comprehensive Case Management Order, confirm deadlines correctly calendared, draft thoughts regarding specific issues in his Order	0.4	\$425	\$ 170.00
		Project Total:	75		\$ 47,183.00

Project: FOIA request to OCC					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-03-27	LCF	Work on draft Freedom of Information Act requests and additional information to request in the same	0.2	\$425	\$ 85.00
2019-03-29	LCF	Continue to work on draft Freedom of Information Act request regarding Wells Fargo's consent orders with the Office of the Comptroller of the Currency, including finalize initial review and analysis of multiple consent orders and amendments as well as finalize initial draft of requests	0.9	\$425	\$ 382.50
2019-04-02	AGS	Work on Freedom of Information Act request; work on discovery timeline	1.3	\$575	\$ 747.50
2019-04-03	LCF	Finish draft Freedom of Information Act request to the Office of the Comptroller of the Currency, including proofread and edit draft, send draft to the team for review	0.4	\$425	\$ 170.00
2019-04-11	LCF	Finalize Freedom of Information Act request to Office of the Comptroller of the Currency, including review and incorporate Ms. Schwarz's edits to the same, draft instructions to Mr. Neal regarding finalizing request and sending to Office of the Comptroller of the Currency, send final request to Gibbs Law Group, confirm response deadline calendared	0.3	\$425	\$ 127.50
2019-04-11	RPN	Finalize and send Freedom of Information Act request	0.5	\$230	\$ 115.00
2019-04-19	LCF	Continue to work on Freedom of Information Act request to the Office of the Comptroller of the Currency, including return call from Freedom of Information Act officer regarding request and inability to obtain records requested, begin to analyze potential next steps	0.3	\$425	\$ 127.50

2019-05-13	LCF	Continue to work on Freedom of Information Request to the Office of the Comptroller of the Currency, including review, analyze, and outline thoughts regarding denial letter received and potential next steps, research Freedom of Information Request exemptions cited in letter	1.2	\$425	\$ 510.00
2019-06-25	GRB	Research and compiled memorandum summarizing the bank examiner privilege and Freedom of Information Act exemption 8	2.5	\$275	\$ 687.50
2019-07-05	LCF	Continue to analyze bank examiner privilege, including finish outlining initial research and thoughts regarding potential applicability of same in discovery and obtaining documents from the Office of the Comptroller of the Currency directly	0.8	\$425	\$ 340.00
		Project Total:	8.4		\$ 3,292.50
Project: Discovery – Plaintiffs’ requests					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-01-14	RMP	Draft written discovery	0.8	\$725	\$ 580.00
2019-01-15	RPN	Start template of initial discovery	0.8	\$230	\$ 184.00
2019-01-15	RMP	Draft written discovery	1.2	\$725	\$ 870.00
2019-02-15	RMP	Draft written discovery and initial disclosures	0.3	\$725	\$ 217.50
2019-02-19	MLS	Review draft discovery	0.5	\$800	\$ 400.00
2019-02-20	RMP	Draft discovery	1	\$725	\$ 725.00
2019-02-21	MLS	Review discovery requests; emails re same	1.3	\$800	\$ 1,040.00
2019-02-22	MLS	Review/edit discovery	0.8	\$800	\$ 640.00
2019-02-25	JJB	Work on interrogatories and document requests to Wells Fargo	3.1	\$580	\$ 1,798.00
2019-02-26	LPL	Confer with J. Bloomfield re: finalizing and serving discovery requests on Defendants; review and analyze final draft of requests	0.4	\$465	\$ 186.00
2019-02-26	LCF	Review and provide suggested additions to draft First Request for Production of Documents and Interrogatories to Wells Fargo	0.5	\$425	\$ 212.50
2019-02-26	MLS	Review and finalize discovery	0.8	\$800	\$ 640.00

2019-02-26	JJB	Finalize and prepare for service interrogatories and document requests to Wells Fargo	0.9	\$580	\$ 522.00
2019-03-08	RMP	Work on discovery plan	0.3	\$725	\$ 217.50
2019-03-08	LCF	Work on plan for Plaintiffs' discovery	0.5	\$425	\$ 212.50
2019-04-02	RMP	Work on discovery plan	0.6	\$725	\$ 435.00
2019-04-11	JJB	Review and analyze Wells Fargo's responses to interrogatories and document requests	1.3	\$580	\$ 754.00
2019-04-12	LCF	Analyze status of Wells Fargo's discovery responses due yesterday, confirm not able to locate service of the same, correspond with Ms. Lam to confirm served, receive copy and forward to Mr. Neal for file	0.1	\$425	\$ 42.50
2019-04-12	RMP	Review and analyze written discovery responses	0.2	\$725	\$ 145.00
2019-04-12	LPL	Review and analyze Wells Fargo's responses to Plaintiffs' first set of interrogatories and requests for production; e-mails with co-counsel re: same	0.3	\$465	\$ 139.50
2019-04-17	LCF	Begin to review and analyze Wells Fargo's responses to First Interrogatory and First Requests for Production of Documents	0.2	\$425	\$ 85.00
2019-04-18	LCF	Continue to review and analyze Wells Fargo's responses to First Interrogatories and First Requests for Production and outline preliminary thoughts regarding objections raised	0.7	\$425	\$ 297.50
2019-04-25	LCF	Begin to research and analyze Wells Fargo's public filings/statements regarding corporate structure and compliance program to potentially further refine discovery requests	1	\$425	\$ 425.00
2019-05-09	RMP	Work on plan for depositions and discovery responses	0.3	\$725	\$ 217.50
2019-05-15	MLS	Review draft doc requests	0.3	\$800	\$ 240.00
2019-05-15	RMP	Work on discovery to Wells Fargo	0.3	\$725	\$ 217.50
2019-05-18	RMP	Draft document requests	0.3	\$725	\$ 217.50

2019-05-20	LCF	Correspond with co-counsel and team regarding litigation strategy and next steps, discovery generally, and deposition scheduling	0.7	\$425	\$ 297.50
2019-05-25	RMP	Prepare for depositions of Wells Fargo and discovery needed	0.9	\$725	\$ 652.50
2019-05-28	LCF	Continue to work on analyzing Wells Fargo's responses to Plaintiffs' First Requests for Production and First Interrogatories, including continue to analyze response to Wells Fargo's May 24 response to Plaintiffs' further attempts to meet and confer and analyze next steps	0.1	\$425	\$ 42.50
2019-05-29	LCF	Outline and analyze outstanding discovery and general case management tasks to be completed in the coming weeks, including analyze additional discovery to serve, finalizing named plaintiffs depositions' logistics/coverage/travel, scheduling and finalizing 30(b)(6) depositions for Wells Fargo and Company and Wells Fargo Bank, North America, and finalizing meet and confer process on Wells Fargo's current discovery responses	2.1	\$425	\$ 892.50
2019-05-30	LCF	Continue to work on finalizing Second Request for Production of Documents to Wells Fargo Bank and 30(b)(6) notice to Wells Fargo and Company, including correspond with Mr. Schrag regarding any additional edits to the same, and review response regarding draft ready to be sent	0.1	\$425	\$ 42.50
2019-05-30	AGS	Review correspondence from defendant regarding first Wells Fargo document production; analyze searches conducted by Wells Fargo and whether they appropriately searched for responsive documents for our Request for Production of documents	1.5	\$575	\$ 862.50

2019-05-30	MLS	Review/edit additional discovery requests; review letter re doc production; conf. L. Lam re plaintiff depositions; tel. call A. Schwarz re same	1.5	\$800	\$ 1,200.00
2019-05-31	LPL	Conference call with team to discuss upcoming depositions, discovery to be served on WF, and document review	0.6	\$465	\$ 279.00
2019-05-31	MLS	Conf. call re discovery, doc review and depo schedule; emails re same	0.7	\$800	\$ 560.00
2019-06-06	GRB	Compile list of Wells Fargo's documents identified as privileged	1.5	\$275	\$ 412.50
2019-06-19	LCF	Continue to work on review and analysis of documents produced by Wells Fargo; begin to work on review and analysis of Wells Fargo's discovery responses and documents to prepare for letter brief/motion to compel	1.3	\$425	\$ 552.50
2019-06-19	RMP	Review hot documents to prepare for depositions and to identify potential deponents; work on class certification strategy	2	\$725	\$ 1,450.00
2019-06-24	LPL	Conf. call with M. Schrag and team re: outstanding discovery tasks in the case	0.7	\$465	\$ 325.50
2019-06-24	RMP	Work on discovery issues related to documents to be produced by Wells Fargo	0.8	\$725	\$ 580.00
2019-06-27	LPL	Draft second set of interrogatories to Wells Fargo Bank; e-mails with G. Munroe re: same	1.9	\$465	\$ 883.50
2019-06-28	RMP	Draft interrogatories	0.5	\$725	\$ 362.50
2019-07-02	LPL	E-mails with co-counsel R. Paul re: second set of interrogatories to WF Bank	0.3	\$465	\$ 139.50
2019-07-02	LPL	Finalize and serve second set of interrogatories to WF Bank; call with G. Munroe re: same	1.3	\$465	\$ 604.50
2019-07-03	LPL	Draft e-mail to defense counsel re: the Massachusetts lawsuit filed in 2013/2014 that flagged the at-issue software glitch for Wells Fargo	0.3	\$465	\$ 139.50

2019-07-12	LPL	Research and draft e-mail to initiate process to de-designate certain documents as confidential; e-mails with team and confer with M. Schrag re: same	1.6	\$465	\$ 744.00
2019-07-26	LCF	Analyze questions regarding which loan types and investors applicable to named plaintiffs, including instruct Mr. Brand regarding locating, reviewing, and creating chart to track plaintiffs' information regarding type of loan and type of loan modification wrongfully denied; review and provide feedback regarding initial draft chart and changes to the same	0.4	\$425	\$ 170.00
2019-07-26	LPL	Conference call with team re: status of document review, outstanding discovery tasks, and upcoming 30(b)(6) deposition	0.6	\$465	\$ 279.00
2019-07-26	MLS	Conf. call re discovery issues and upcoming depositions; emails re same	0.7	\$800	\$ 560.00
2019-07-28	LCF	Finish review and outline of the type of loan and loan program at issue for each named plaintiff; review draft chart from Mr. Brand and "cap sheet" for each named plaintiff	1	\$425	\$ 425.00
2019-08-02	LCF	Continue to analyze Wells Fargo's initial privilege log; instruct Ms. Cowger regarding assembling documents marked as "privileged" and/or "redacted" for further review and analysis	0.2	\$425	\$ 85.00
2019-10-08	JJB	Call with co-counsel re case status and upcoming tasks and deadlines	1	\$580	\$ 580.00
2019-10-08	LPL	Conf. call with team re: serving new discovery requests, preparing for hearing on class certification, and upcoming settlement conference	1	\$465	\$ 465.00
2019-10-08	MLS	Conf. call Team re upcoming tasks, class cert hearing prep and settlement conf. prep	1	\$800	\$ 800.00
2019-10-09	LPL	Review and analyze Wells Fargo's privilege log for potential documents to challenge or seek from the OCC	0.6	\$465	\$ 279.00

2019-10-10	LPL	E-mails with J. Bloomfield, N. Shah, and co-counsel re: meeting to confer on ideas for new deponents and new discovery requests	0.2	\$465	\$ 93.00
2019-10-10	LPL	Review and analyze WF's privilege log for potential documents to push back on; call with co-counsel L. Fellows re: same	2.9	\$465	\$ 1,348.50
2019-10-11	LPL	Conf. call with J. Bloomfield, N. Shah, and co-counsel re: ideas for new discovery requests and additional deponents; e-mail to team re: same	0.9	\$465	\$ 418.50
2019-10-12	RMP	Draft discovery to Wells Fargo	0.7	\$725	\$ 507.50
2019-10-14	LCF	Research additional information regarding prior errors and outline thoughts regarding additional discovery to request regarding the same and send to Ms. Lam	0.6	\$425	\$ 255.00
2019-10-14	LPL	Conf. call with team re: moving forward with discovery requests and preparing for hearing on class certification motion	0.6	\$465	\$ 279.00
2019-10-14	MLS	Conf. call Team re discovery, settlement conf. plan and class cert argument prep	0.6	\$800	\$ 480.00
2019-10-15	LCF	Begin to review recent production from Wells Fargo and outline preliminary thoughts and facts learned from the same	0.9	\$425	\$ 382.50
2019-10-15	LPL	Draft second set of requests for production to Wells Fargo	2.2	\$465	\$ 1,023.00
2019-10-16	LPL	Edits to Plaintiffs' third set of requests for production	0.2	\$465	\$ 93.00
2019-10-16	LCF	Continue to work on drafts of Second Requests for Production and Third Interrogatories to Wells Fargo, including review, analyze, and outline thoughts regarding initial drafts from Ms. Lam and potential changes to the same; outline thoughts and additional changes with Mr. Paul and circulate proposed changes and additions to initial drafts	1	\$425	\$ 425.00

2019-10-17	LPL	Further edits to Plaintiffs' second set of discovery requests; e-mail to team re: same	0.4	\$465	\$ 186.00
2019-10-17	MLS	Review/edit discovery requests	1.3	\$800	\$ 1,040.00
2019-10-21	LCF	Work on additional discovery to Wells Fargo and correspondence regarding executive summaries and decision not to request additional information regarding summaries; continue to analyze thoughts regarding following up on various issues regarding alleged privilege assertions by Wells Fargo	0.3	\$425	\$ 127.50
2019-10-21	LPL	E-mails with co-counsel re: propounding new discovery responses, and following up with WF on communications to class members	0.4	\$465	\$ 186.00
2019-10-21	LPL	Call with co-counsel L. Fellows re: finalizing and serving Plaintiffs' third set of document requests	0.4	\$465	\$ 186.00
2019-10-22	LPL	Finalize and serve Plaintiffs' third set of interrogatories and second set of RFPs	0.3	\$465	\$ 139.50
2019-10-22	LCF	Outline and analyze outstanding case tasks and next steps to serve additional discovery and notice up additional depositions as well as prepare for upcoming class certification hearing and settlement conference; begin to research potential deponent for similar Veterans Administration loan error	0.8	\$425	\$ 340.00
2019-10-25	LCF	Review correspondence from Mr. Schrag and Ms. Lam regarding documents marked as bank examiner privileged; outline thoughts regarding next steps and specific categories of documents marked Bank Examiner Privileged	0.6	\$425	\$ 255.00
2019-11-07	LPL	E-mails with co-counsel L. Fellows re: reviewing WF's privilege log and pushing back on suspect entries	0.2	\$465	\$ 93.00
2019-11-13	LPL	Draft interrogatories and RFAs on different contracts that different class members had, and terms of named plaintiffs' would-be loan modifications	0.8	\$465	\$ 372.00

2019-11-14	LPL	Draft new discovery requests to WF on different types of contracts and class representatives' would-be mortgage modifications	1.9	\$465	\$ 883.50
2019-11-22	LCF	Review correspondence from Wells Fargo with answers to Plaintiffs' Third Set of Interrogatories and Second Requests for Production, begin to review and analyze responses and outline thoughts regarding additional follow-up needed	0.3	\$425	\$ 127.50
2019-11-23	RMP	Review Wells Fargo's discovery responses	0.2	\$725	\$ 145.00
2019-11-24	RMP	Review recent discovery items and needs for additional discovery	0.6	\$725	\$ 435.00
2019-11-25	LPL	E-mail to team re: potential additional deponents from WF's initial disclosures	0.4	\$465	\$ 186.00
2019-11-25	LCF	Begin to analyze additional depositions and whether any needed before upcoming close of discovery, including analyze Wells Fargo's Supplemental disclosures, review and analyze relevant documents and whether additional testimony needed or potentially needed regarding the same, and outline thoughts regarding potential deponents and next steps for the team	1.2	\$425	\$ 510.00
2019-11-26	LCF	Continue to analyze additional depositions and whether any needed before upcoming close of discovery as well as review and analyze relevant documents and whether additional documents needed, continue outline thoughts regarding potential deponents and documents/general discovery needed; correspond with the team regarding the same	5.6	\$425	\$ 2,380.00

2019-11-27	LCF	Continue to comprehensively analyze whether outstanding documents to be requested and/or additional deponents to request before impending close of discovery, including analyze Wells Fargo's productions to date and testimony and documents needed to prove each element of claim	4.2	\$425	\$ 1,785.00
2019-12-07	LCF	Begin to review Wells Fargo's responses to Plaintiffs' Second Set of Requests for Production and Third Interrogatories; outline preliminary thoughts regarding follow-up needed	0.2	\$425	\$ 85.00
2019-12-10	LPL	Finalize and serve Plaintiffs' fifth set of interrogatories to Wells Fargo	0.3	\$465	\$ 139.50
2019-12-10	LPL	E-mails with team re: serving new interrogatories for all CA class members' would-be trial period payment amounts	0.4	\$465	\$ 186.00
2019-12-10	NS	Drafting Plaintiffs' Fifth Set of Interrogatories re: absent CA class members	0.9	\$415	\$ 373.50
2019-12-30	RMP	Work on discovery plan for depositions	0.4	\$725	\$ 290.00
2020-01-02	RMP	Work on discovery issues; prepare for depositions	0.4	\$725	\$ 290.00
2020-01-09	LCF	Begin to review and analyze additional California class member information provided by Wells Fargo's responses to Plaintiffs' Fifth Set of Interrogatories	0.2	\$425	\$ 85.00
2020-01-10	LCF	Call with Mr. Salah regarding Wells Fargo discovery responses for California plaintiffs	0.4	\$425	\$ 170.00
2020-01-30	LCF	Review correspondence from Wells Fargo regarding stopping discovery of California borrowers in light of class certification order and revising draft discovery letter, analyze potential next steps with the team	0.1	\$425	\$ 42.50

2020-02-11	LCF	Review response from Ms. Obi regarding Wells Fargo's response to Request Number 24 (documents with senators), draft and send response to confirm Wells Fargo will not withhold non-privileged documents and inquire regarding status of Wells Fargo's final privilege log	0.1	\$425	\$ 42.50
		Project Total:	79.8		\$ 42,713.00
Project: Discovery – Plaintiffs' responses					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-04-26	LCF	Preliminarily review Wells Fargo's First Request for Production of Documents and Interrogatories to the named Plaintiffs, confirm response date correctly calendared	0.2	\$425	\$ 85.00
2019-04-29	RMP	Review Wells Fargo's written discovery to Plaintiffs	0.4	\$725	\$ 290.00
2019-05-01	LPL	Confer with M. Schrag re: whether we want to have named plaintiffs' depositions in San Francisco	0.2	\$465	\$ 93.00
2019-05-01	LPL	Draft plan for team to work on responding to Wells Fargo's first set of interrogatories, requests for production, and deposition notices; e-mails with team re: same	0.9	\$465	\$ 418.50
2019-05-01	MLS	Review discovery on class reps and L. Lam plan for same; conf. L. Lam re same	1.2	\$800	\$ 960.00

2019-05-03	LCF	Continue to work on Wells Fargo's first set of discovery to the named plaintiffs, including review, analyze, and outline thoughts regarding Ms. Lam's proposed correspondence and course of action with respect to responses to First Interrogatories and First Request for Production of Documents; revise and send correspondence to Mr. and Mrs. Floyd, Mr. and Mrs. Simoneaux, and Ms. Wilson regarding discovery requests and next steps to review and respond to the same, review responses regarding availability from Mr. Floyd and Ms. Simoneaux and respond to the same	1.3	\$425	\$ 552.50
2019-05-06	LCF	Continue to work on responses to Wells Fargo's First Request for Production of Documents and Interrogatories to named plaintiffs, including call with Brenda and Russell Simoneaux regarding documents requested and information requested; review notes regarding documents she might have available and draft follow-up correspondence to them regarding searching for documents	1.6	\$425	\$ 680.00
2019-05-08	LPL	Conf. call with M. Schrag, J. Bloomfield, and co-counsel re: plan for responding to plaintiffs' discovery and plaintiffs' depositions	0.6	\$465	\$ 279.00
2019-05-08	RMP	Work on plan to prepare for depositions and discovery responses	0.6	\$725	\$ 435.00
2019-05-08	MLS	Conf. call re plaintiff discovery issues and plan	0.7	\$800	\$ 560.00
2019-05-08	LPL	E-mails and calls to named plaintiffs to discuss their depositions and responses to Wells Fargo Bank's first set of discovery requests	0.9	\$465	\$ 418.50

2019-05-08	LCF	Continue to work on responses to Wells Fargo's First Requests for Production and First Interrogatories and Interrogatories to named plaintiffs, including call with Cyndi and George Floyd regarding documents requested and information requested	1.1	\$425	\$ 467.50
2019-05-09	LPL	Call with co-counsel L. Fellows re: approach for responding to WF's first set of discovery requests and setting up Plaintiff depositions	0.3	\$465	\$ 139.50
2019-05-09	LCF	Correspond with Ms. Wilson regarding Wells Fargo's First Requests for Production and Interrogatories to her, including review documents previously received from her in preparation for the same, outline list of documents to discuss with her	0.5	\$425	\$ 212.50
2019-05-09	LCF	Continue to work on Mr. and Mrs. Floyd's responses to Wells Fargo's First Requests for Production and Interrogatories, including draft confirmatory email to them regarding documents for which to search and process to obtain copies of the same, review request for follow-up call from Mr. Floyd and schedule same, correspond with Mr. and Mrs. Floyd regarding initial document search and next steps with respect to discovery requests and finalizing responses	1.1	\$425	\$ 467.50
2019-05-09	LPL	Calls with Diana Trevino and Alicia Hernandez re: their upcoming depositions and discovery responses	2.1	\$465	\$ 976.50
2019-05-10	LCF	Continue to work on Ms. Wilson's responses to Wells Fargo's First Request for Production of Documents and Interrogatories to her, including draft follow-up correspondence listing documents for which she is to search and confirm follow-up call for next week	0.3	\$425	\$ 127.50

2019-05-10	RPN	Prepare client documents for production; draft responsive discovery letter	0.7	\$230	\$ 161.00
2019-05-10	LCF	Continue to work on Mr. and Mrs. Floyd responses to Wells Fargo's First Request for Production of Documents and Interrogatories, including preliminarily review numerous additional emails received from Ms. Floyd, send to Mr. Neal for file and to review for potential duplication; draft instructions to Mr. Neal regarding preparing documents and excel charts for reviewing and coding of documents in preparation for upcoming discovery responses; draft follow-up correspondence to Ms. Floyd to confirm all relevant electronic and paper files have been searched, as well as draft list of additional facts/information to obtain from Ms. Floyd for draft interrogatory responses	1	\$425	\$ 425.00
2019-05-10	LPL	Call with plaintiff Emma White re: her deposition and responses to WF's first set of interrogatories	1.1	\$465	\$ 511.50
2019-05-10	LPL	Draft template objections for Plaintiffs' responses to Wells Fargo's first set of interrogatories; e-mail to M. Schrag re: same	1.6	\$465	\$ 744.00
2019-05-13	LCF	Continue to work on Brenda and Russell Simoneaux's discovery responses, including follow-up call with Ms. Simoneaux regarding documents sent and confirming search completed	0.2	\$425	\$ 85.00

2019-05-13	LCF	Continue to work on responses to Wells Fargo's First Request for Production of Documents and Interrogatories to named plaintiffs, including follow-up call with Rose Wilson regarding documents requested and information requested; review notes regarding documents she might have available and draft follow-up correspondence to her regarding searching for documents and information	1.4	\$425	\$ 595.00
2019-05-13	LPL	Work on drafting responses to Wells Fargo Bank's first set of interrogatories to Plaintiffs	1.8	\$465	\$ 837.00
2019-05-14	RPN	Prepare client documents for production	0.8	\$230	\$ 184.00
2019-05-14	LPL	Draft plaintiffs' responses to Wells Fargo Bank's first set of interrogatories; calls with plaintiffs to go over the interrogatories	3.8	\$465	\$ 1,767.00
2019-05-15	LCF	Continue to work on Mr. Frye's responses to Wells Fargo's First Request for Production of Documents and Interrogatories, including attempt to contact Mr. Frye to schedule time to discuss documents and information requested	0.1	\$425	\$ 42.50
2019-05-15	LCF	Continue to work on responses to Wells Fargo's First Set of Interrogatories to the named plaintiffs, including review draft objections from Ms. Lam, analyze whether additional objections warranted, briefly discuss drafts with Mr. Paul	0.5	\$425	\$ 212.50
2019-05-15	LCF	Continue to work on Cyndi and George Floyd's discovery responses, including receive update from Ms. Floyd regarding status of searching for documents and locating information, and begin to draft interrogatory responses for Mr. and Mrs. Floyd	0.9	\$425	\$ 382.50

2019-05-16	LCF	Continue to work on George and Cyndi Floyd's responses to Wells Fargo's First Set of Interrogatories and Requests for Production, including review additional emails received	0.1	\$425	\$ 42.50
2019-05-16	RPN	Prepare client documents for production	0.1	\$230	\$ 23.00
2019-05-16	LCF	Continue to work on Rose Wilson's responses to Wells Fargo's First Set of Interrogatories and Requests for Production, including correspond with Ms. Wilson regarding status of her review of documents, as well as continue to draft interrogatory responses for Ms. Wilson	0.4	\$425	\$ 170.00
2019-05-16	LPL	Call with named plaintiff Debora Granja to go over her interrogatory responses; e-mails with other named plaintiffs about their interrogatory responses	1.4	\$465	\$ 651.00
2019-05-16	LCF	Continue to work on Cyndi and George Floyd's discovery responses, including call with Mr. and Mrs. Floyd to review additional questions regarding facts and documents requested, finalize draft interrogatory responses and send to Mr. and Mrs. Floyd to review for accuracy	1.6	\$425	\$ 680.00
2019-05-16	LCF	Continue to work on Mr. and Mrs. Simoneaux's responses to Wells Fargo's First Set of Interrogatories, including reviewing prior court filings for them and review to confirm no prior bankruptcies; review and analyze documents previously received from them, confirm same were produced; send draft answers to Mr. and Mrs. Simoneaux to review for accuracy	3.2	\$425	\$ 1,360.00
2019-05-17	KDJ	Review and organize client documents for production	0.7	\$250	\$ 175.00

2019-05-17	LCF	Continue to work on named plaintiffs' responses to First Set of Interrogatories, including finalize draft interrogatory responses for Mr. and Mrs. Simoneaux, Mr. and Mrs. Floyd, and Ms. Wilson, outline thoughts regarding drafts and specific questions, circulate drafts to Plaintiffs' counsel for further review and feedback, review draft interrogatory responses from Ms. Lam	0.8	\$425	\$ 340.00
2019-05-17	LPL	Continue drafting Plaintiffs' responses to Wells Fargo's first set of interrogatories	0.9	\$465	\$ 418.50
2019-05-17	LPL	E-mails and calls with several plaintiffs to follow up on their document requests and interrogatory responses	0.9	\$465	\$ 418.50
2019-05-17	LCF	Continue to work on Mr. Frye's responses to Wells Fargo's First Set of Requests for Production and Interrogatories, including continue to review documents previously received from Mr. Frye, continue to draft interrogatory responses, review prior court filings regarding Mr. Frye, and outlines notes/questions to discuss with Mr. Frye regarding Wells Fargo's requests	1	\$425	\$ 425.00
2019-05-17	JJB	Review client documents for production	2.1	\$580	\$ 1,218.00
2019-05-17	JJB	Calls and emails with clients re responses to document requests and interrogatories	2.5	\$580	\$ 1,450.00
2019-05-17	LCF	Continue to work on Ms. Wilson's responses to Wells Fargo's First Set of Interrogatories, including research prior cases in which Ms. Wilson was a plaintiff and prior bankruptcy to assist with finishing draft responses, finish draft responses and send to Ms. Wilson to review for accuracy; correspond with Ms. Wilson regarding forthcoming documents	2.7	\$425	\$ 1,147.50

2019-05-20	LCF	Continue to work on Mr. and Mrs. Floyd's responses to Wells Fargo's First Requests for Production and Interrogatories, including review update from Ms. Floyd regarding documents forthcoming	0.1	\$425	\$ 42.50
2019-05-20	LCF	Continue to work on Ms. Wilson's responses to Wells Fargo's First Set of Interrogatories and First Request for Production, including preliminary review lengthy correspondence and documents received from Ms. Wilson and forward to Mr. Neal to be saved to the file and prepare for review and analysis	0.1	\$425	\$ 42.50
2019-05-20	LCF	Continue to work on Mr. and Mrs. Simoneaux's responses to Wells Fargo's First Set of Interrogatories and Requests for Production, including review additional information from Ms. Simoneaux and forward to Mr. Neal for file; correspond with Ms. Simoneaux regarding documents sent, deposition availability, and confirming interrogatories correct; review additional documents from Ms. Simoneaux	0.4	\$425	\$ 170.00
2019-05-20	KDJ	Review and prepare client documents for production	1.2	\$250	\$ 300.00
2019-05-20	JJB	Review client documents for production	1.4	\$580	\$ 812.00
2019-05-20	LPL	Calls and e-mails with named plaintiffs to go over Wells Fargo Bank's first set of requests for production	1.6	\$465	\$ 744.00
2019-05-20	JJB	Calls and emails with clients re responses to document requests and interrogatories	2.3	\$580	\$ 1,334.00

2019-05-20	LCF	Continue to work on responses to Wells Fargo's First Request for Production of Documents and Interrogatories to named plaintiff Troy Frye, including call with Mr. Frye regarding documents requested and information requested; review notes regarding documents he might have available and draft follow-up correspondence to him regarding searching for documents and information, as well as finalize draft interrogatory responses and send to him to review for accuracy	2.6	\$425	\$ 1,105.00
2019-05-21	RMP	Work on plaintiffs' discovery responses and plan for depositions	0.2	\$725	\$ 145.00
2019-05-21	LPL	Call with plaintiff Emma White to discuss her upcoming deposition, her responses to the RFPs, and her responses to interrogatories	0.4	\$465	\$ 186.00
2019-05-21	LPL	Calls with plaintiff Diana Trevino to discuss her upcoming deposition, her responses to the RFPs, and her responses to interrogatories	0.4	\$465	\$ 186.00
2019-05-21	LCF	Continue to work on Mr. and Mrs. Simoneaux's responses to Wells Fargo's First Set of Interrogatories and Requests for Production, including begin to review and analyze whether documents from them responsive to Wells Fargo's discovery requests	1.4	\$425	\$ 595.00
2019-05-21	KDJ	Review client documents and prepare for production	1.5	\$250	\$ 375.00
2019-05-21	JJB	Review client documents for production	1.6	\$580	\$ 928.00

2019-05-21	LCF	Continue to work on Mr. and Mrs. Floyd's responses to Wells Fargo's First Set of Interrogatories, including review and analyze additional edits and comments from Mr. and Mrs. Floyd, begin to revise responses in light of the same, review and analyze documents from them to confirm interrogatory responses do not conflict with document, correspond with Ms. Floyd regarding additional questions regarding their interrogatory responses	1.6	\$425	\$ 680.00
2019-05-21	JJB	Calls and emails with clients re responses to document requests and interrogatories	2.2	\$580	\$ 1,276.00
2019-05-21	LPL	Draft template objections/responses to Wells Fargo Bank's first set of requests for production	2.5	\$465	\$ 1,162.50
2019-05-22	JJB	Calls and emails with clients re responses to document requests and interrogatories	1.8	\$580	\$ 1,044.00
2019-05-22	RPN	Prepare client documents for production	1.9	\$230	\$ 437.00
2019-05-22	JJB	Review client documents for production	2.9	\$580	\$ 1,682.00

2019-05-22	LCF	Continue to work on finalizing responses to Wells Fargo's First Set of Interrogatories and First Set of Requests for Production for Mr. and Mrs. Simoneaux, Mr. and Mrs. Floyd, and Ms. Wilson, including draft template verification page, review Northern District of California local rules regarding verification, if any, send draft verification template to Ms. Lam, incorporate her edits, and finalize template; continue to work on interrogatory responses for Ms. Wilson, Mr. and Mrs. Floyd, and Mr. and Mrs. Simoneaux, including finish incorporating revisions to draft responses, draft cover emails and send final responses for review and confirmation information correct along with verification page for signatures; continue to work on document production; finish review and analysis of Mr. and Mrs. Simoneaux's documents, begin to review Mr. and Mrs. Floyd's and Ms. Wilson's additional documents for responsiveness and analyze impact of same, if any, on interrogatory	5.5	\$425	\$ 2,337.50
2019-05-23	LCF	Continue to work on finalizing named plaintiffs' responses to Wells Fargo's First Set of Interrogatories, including review signed verification pages from Mr. and Mrs. Simoneaux; confirm verification pages signed by Mr. and Mrs. Floyd, Ms. Wilson, and Mr. Frye, instruct Mr. Neal regarding preparing final interrogatories for co-counsel to produce, review final copies	0.3	\$425	\$ 127.50
2019-05-23	JJB	Calls and emails with clients re responses to document requests and interrogatories	1.1	\$580	\$ 638.00

2019-05-23	LCF	Continue to work on Mr. Frye's responses to Wells Fargo's First Set of Interrogatories and Requests for Production, including review edits to draft interrogatories from Mr. Frye, revise draft responses to incorporate edits, send revised final interrogatory responses to him to review for accuracy; review numerous emails with documents from Mr. Frye and prepare for responsiveness review; correspond with Mr. Frye regarding finalizing interrogatories and finalizing deposition scheduling/travel; continue to work on responses to Wells Fargo's First Set of Requests for Production, including review and analyze documents from him for responsiveness	1.8	\$425	\$ 765.00
2019-05-23	RPN	Prepare client documents for production	2.5	\$230	\$ 575.00
2019-05-23	JJB	Review client documents for production	2.6	\$580	\$ 1,508.00
2019-05-23	LCF	Continue to work on Mr. and Mrs. Floyd's responses to Wells Fargo's First Set of Interrogatories, including review additional changes to drafts, revise drafts, and resend to them for review, confirm final drafts correct; continue to review and analyze documents from them for responsiveness	3.7	\$425	\$ 1,572.50
2019-05-24	MLS	Review/edit discovery responses	1	\$800	\$ 800.00
2019-05-24	JJB	Calls and emails with clients re responses to document requests and interrogatories	1.3	\$580	\$ 754.00
2019-05-24	RPN	Prepare client documents for production	1.4	\$230	\$ 322.00
2019-05-24	JJB	Review client documents for production	1.9	\$580	\$ 1,102.00
2019-05-24	LPL	Work to review and finalize Plaintiffs' responses to Wells Fargo's first set of discovery requests	3.4	\$465	\$ 1,581.00

2019-05-24	LCF	Continue to work on finalizing Plaintiffs' responses to Wells Fargo's First Set of Requests for Production and First Set of Interrogatories, including review final client documents to be provided to co-counsel for bates stamping, redactions, and privilege, correspond with Mr. Neal regarding changes to the same, confirm correct documents send to co-counsel's office, send information to co-counsel's office regarding documents to be redacted; begin to draft responses to Wells Fargo's First Requests for Production to Mr. and Mrs. Simoneaux, Ms. Wilson, Mr. and Mrs. Floyd, and Mr. Frye, including review and analyze final request for production template from Ms. Lam and begin to review and analyze documents to be produced and whether each has documents responsive to each category; correspond with Ms. Lam regarding decision to finalize and serve discovery next Tuesday	5.9	\$425	\$ 2,507.50
2019-05-25	LCF	Continue to work on finalizing Plaintiffs' responses to Wells Fargo's First Set of Requests for Production and First Set of Interrogatories, including continue to work on request for production template from Ms. Lam, review revised draft, and correspond with Ms. Lam regarding additional edits/comments contained in the same	0.2	\$425	\$ 85.00
2019-05-25	LPL	Draft named plaintiff Debora Granja's and Alicia Hernandez's responses to WF's first set of requests for production	1.2	\$465	\$ 558.00
2019-05-25	LPL	Review and finalize certain named plaintiffs' responses to WF Bank's first set of interrogatories; e-mails with plaintiffs re: same	1.9	\$465	\$ 883.50
2019-05-28	MLS	Conf. L. Lam re discovery responses	0.5	\$800	\$ 400.00

2019-05-28	RPN	Prepare client documents for production; draft discovery responses	1.4	\$230	\$ 322.00
2019-05-28	LCF	Finish responses to Wells Fargo's First Requests for Production to Mr. and Mrs. Simoneaux, Ms. Wilson, Mr. and Mrs. Floyd, and Mr. Frye, including review summary of documents to be produced, and send to Mr. Neal to finalize; confirm final interrogatory responses and requests for production responses for these plaintiffs sent to co-counsel to be produced; correspond with Ms. Lam regarding status of finalizing and serving discovery responses and assist with drafting Request for Production responses for Mr. Linder, Ms. Teague, Ms. Brown, and Mrs. and Mr. Demartino	1.9	\$425	\$ 807.50
2019-05-28	LPL	Review, edit, and produce documents Plaintiffs are producing responsive to Defendants' first set of requests for production	3.4	\$465	\$ 1,581.00
2019-05-28	LPL	Review, edit, finalize, and produce Plaintiffs' responses to WF Bank's first set of interrogatories and requests for production	4.6	\$465	\$ 2,139.00
2019-05-29	LCF	Review final letter and document production to Wells Fargo; and correspond with Ms. John regarding timing to confirm documents uploaded and ready for review	0.1	\$425	\$ 42.50
2019-05-31	LCF	Work on upcoming named plaintiff depositions and finishing plaintiffs' discovery responses	0.7	\$425	\$ 297.50
2019-06-03	LPL	Call with named plaintiff Debora Granja re: her thorough search for relevant documents	0.4	\$465	\$ 186.00
2019-06-03	LCF	Work on privilege log for plaintiffs' document production; review and analyze local rules and Judge Alsup's standing order to confirm draft will be in compliance with any specific requirements	0.5	\$425	\$ 212.50

2019-06-03	JJB	Calls and emails with clients re discovery responses and deposition travel and scheduling	1.8	\$580	\$ 1,044.00
2019-06-05	LCF	Continue to work on privilege log for plaintiffs' document production, including review Mr. Brand's initial draft privilege log, instruct Mr. Brand regarding edits to the same	0.7	\$425	\$ 297.50
2019-06-05	JJB	Calls and emails with clients re discovery responses and deposition travel and scheduling	2.2	\$580	\$ 1,276.00
2019-06-05	LPL	Review and produce supplemental document production from named plaintiff Debora Granja	2.4	\$465	\$ 1,116.00
2019-06-06	LCF	Continue to work on privilege log for plaintiffs' document production, including review revised draft privilege log from Mr. Brand and begin to edit/revise same to finalize and send to co-counsel	1	\$425	\$ 425.00
2019-06-07	LPL	E-mail to team re: whether we should request medical records from our clients' providers	0.2	\$465	\$ 93.00
2019-06-13	MLS	Conf. J. Bloomfield and L. Lam re plaintiff depositions; tel. call R. Paul re same, plan for next week depositions and mediation	1.5	\$800	\$ 1,200.00
2019-06-19	LPL	Legal research and e-mail to defense counsel re: whether the attorney-client privilege applies to communications between an attorney and a prospective client	0.6	\$465	\$ 279.00
2019-06-20	LPL	E-mail to J. Bloomfield and M. Schrag re: Wells Fargo's continued late productions before named plaintiff depositions	0.2	\$465	\$ 93.00
2019-06-20	MLS	Review meet and confer emails re plaintiff discovery issues	0.5	\$800	\$ 400.00
2019-06-20	LPL	E-mail to team re: our responses to Wells Fargo's meet and confer letter regarding our discovery responses	0.8	\$465	\$ 372.00

2019-06-25	LPL	Draft e-mail to defense counsel re: following up on outstanding discovery issues that WF has raised with respect to Plaintiffs' responses to discovery requests	0.4	\$465	\$ 186.00
2019-07-01	LCF	Outline and analyze strategy regarding various discovery issues, including supplementing Plaintiffs' discovery responses	0.2	\$425	\$ 85.00
2019-07-15	LPL	E-mail to defense counsel re: follow up on supplementing Plaintiffs' interrogatory responses and initial disclosures	0.3	\$465	\$ 139.50
2019-07-16	LPL	E-mails with J. Bloomfield and co-counsel L. Fellows re: supplementing Plaintiffs' interrogatory responses	0.2	\$465	\$ 93.00
2019-07-22	LPL	Edits to draft medical release for named plaintiffs' medical records and billing; e-mail to defense counsel re: same	0.3	\$465	\$ 139.50
2019-07-22	JJB	Calls to clients re supplemental interrogatory responses	1.5	\$580	\$ 870.00
2019-07-23	JJB	Calls to clients re supplemental interrogatory responses	0.9	\$580	\$ 522.00
2019-07-23	LPL	Supplement Plaintiffs' interrogatory responses with additional information; calls with clients re: same	2.7	\$465	\$ 1,255.50
2019-07-25	LPL	Work on supplementing Plaintiffs' interrogatory responses with additional information on witnesses and pre-existing conditions	1.1	\$465	\$ 511.50
2019-07-25	JJB	Calls to clients re supplemental interrogatory responses	1.8	\$580	\$ 1,044.00
2019-07-26	LCF	Begin to work on supplemental responses to interrogatory number 4 for Mr. Frye, Mr. and Mrs. Floyd, and Mrs. Wilson	0.3	\$425	\$ 127.50
2019-07-26	JJB	Finalize supplemental interrogatory responses	1.9	\$580	\$ 1,102.00
2019-07-26	LPL	Work on supplemental Plaintiffs' interrogatory responses and initial disclosures	3.4	\$465	\$ 1,581.00

2019-08-02	LCF	Continue to work on supplemental interrogatory responses for Ms. Wilson, Mr. Frye, and Mr. and Mrs. Floyd, including outline and analyze additional information needed, draft correspondence to each outlining information requested, review deposition testimony regarding interrogatories and potential witnesses to confirm no changes needed, and begin to draft supplemental responses	2.5	\$425	\$ 1,062.50
2019-08-07	LPL	E-mails with co-counsel L. Fellows re: asking named plaintiffs to sign medical releases for records relating to health issues stemming from Wells Fargo's conduct	0.3	\$465	\$ 139.50
2019-08-07	LCF	Continue to work on supplemental interrogatory responses for Ms. Wilson, Mr. Frye, and Mr. and Mrs. Floyd, including instruct Mr. Neal regarding following up with clients to obtain informatino requested, as well as draft proposed supplemental responses based on information obtained, draft list of information needed for Mr. Neal; begin to work on healthcare authorizations requested by Wells Fargo, including review, analyze, and outline thoughts regarding authorizations needed for specific plaintiffs	1.1	\$425	\$ 467.50
2019-08-07	RPN	Prepare form answers to 1st amended interrogatories for clients George and Cyndi Floyd, Troy Frye, and Rose Wilson; draft HITECH medical records releases from clients George and Cyndi Floyd for production	3.2	\$230	\$ 736.00
2019-08-09	LCF	Continue to work on supplemental interrogatory responses for Ms. Wilson, Mr. Frye, and Mr. and Mrs. Floyd, including review updated drafts from Mr. Neal	0.5	\$425	\$ 212.50
2019-08-09	RPN	Draft discovery responses	0.8	\$230	\$ 184.00

2019-08-12	LCF	Continue to work on Ms. Wilson's supplemental interrogatory responses, including review updated draft from Mr. Neal and instruct him regarding additional changes to draft	0.1	\$425	\$ 42.50
2019-08-12	LPL	Confer with co-counsel L. Fellows re: medical record releases for Wells Fargo and status on supplemental interrogatory responses	0.3	\$465	\$ 139.50
2019-08-12	RPN	Draft discovery responses	1	\$230	\$ 230.00
2019-08-13	RPN	Draft discovery responses	0.6	\$230	\$ 138.00
2019-08-13	LCF	Finish supplemental interrogatory responses for Mr. and Mrs. Floyd, Ms. Wilson, and Mr. Frye, including confirm verification pages completed for each and review final drafts; finalize medical authorizations, including review and analyze medical providers listed in interrogatory responses, outline authorizations to be completed; review final authorizations; draft summary of discovery completed and send to Ms. Lam to be forwarded to Wells Fargo's counsel	0.9	\$425	\$ 382.50
2019-08-15	LPL	E-mails with clients and defense counsel re: named plaintiffs' medical records releases and supplemental interrogatory responses	0.5	\$465	\$ 232.50
2019-10-04	RMP	Review subpoenas from Wells Fargo to medical providers	0.1	\$725	\$ 72.50
2019-10-07	LPL	Review and analyze subpoenas issued by Wells Fargo to client's medical providers	0.3	\$465	\$ 139.50
2019-10-11	JJB	Emails and calls to class representatives re HIPAA releases	0.4	\$580	\$ 232.00
2019-10-22	LPL	E-mails with defense counsel Stacie Knight re: Wells Fargo's subpoenas to named plaintiffs' healthcare providers	0.1	\$465	\$ 46.50
2019-11-21	LCF	Begin to review Wells Fargo's Second Request for Production of Documents to named plaintiffs and Third Interrogatories to Ms. Hernandez	0.2	\$425	\$ 85.00

2019-11-21	RPN	Review second set of interrogatories and requests for production to 15 clients for the preparation of responses to that discovery	0.2	\$230	\$	46.00
2019-11-25	LCF	Review request for additional medical records authorization for Mr. Floyd from Wells Fargo and confirm will follow-up with Mr. Floyd	0.1	\$425	\$	42.50
2019-11-25	LPL	Confer with M. Schrag re: responding to WF's new discovery requests	0.4	\$465	\$	186.00
2019-11-25	LPL	E-mails with defense counsel and co-counsel L. Fellows re: obtaining new medical records releases from clients	0.4	\$465	\$	186.00
2019-11-26	LCF	Review request for additional medical authorizations for Mr. Floyd; instruct Mr. Neal to contact him to obtain signatures on the same	0.1	\$425	\$	42.50
2019-11-27	RPN	Contact clients about obtaining additional medical authorizations	0.6	\$230	\$	138.00
2019-12-06	LCF	Assist with final response to Wells Fargo's Second Interrogatories to Ms. Hernandez seeking copy of client list, including review and provide feedback to Mr. Bloomfield and Ms. Lam regarding draft response	0.3	\$425	\$	127.50
2019-12-06	LPL	Work with co-counsel L. Fellows re: privilege log and other outstanding discovery matters	0.6	\$465	\$	279.00
2019-12-06	LCF	Continue to work on Plaintiffs' privilege log, including correspond with Ms. Lam and Mr. Bloomfield regarding documents withheld for those plaintiffs for whom they drafted discovery responses and begin to add relevant entries to draft privilege log	1	\$425	\$	425.00
2019-12-08	LPL	Review and edit Plaintiffs' draft privilege log	0.2	\$465	\$	93.00
2019-12-08	LCF	Continue to work on Plaintiffs' privilege log, including finish draft and send to the team for review/edits; review response from Ms. Lam confirming no changes	2	\$425	\$	850.00

2019-12-09	RPN	Formatted privilege log regarding the confidential communications of 10 plaintiffs	0.2	\$230	\$ 46.00
2019-12-09	LCF	Finalize and produce Plaintiffs' Privilege Log	0.4	\$425	\$ 170.00
2019-12-16	LCF	Continue to work on responses to Wells Fargo's Second Interrogatories and Second Request for Production of Documents to named plaintiffs, including responses for Ms. Wilson, Mr. and Mrs. Floyd, Mr. and Mrs. Simoneaux, and Mr. Frye, including review and begin to outline thoughts regarding responses	0.3	\$425	\$ 127.50
2019-12-16	RPN	Work on discovery responses for named plaintiffs, including responses for Ms. Wilson, Mr. and Mrs. Floyd, Mr. and Mrs. Simoneaux, and Mr. Frye	3.1	\$230	\$ 713.00
2019-12-17	LCF	Continue to work on responses to Second Requests for Production and Second Interrogatories to Mr. Frye, Ms. Wilson, Mr. and Mrs. Simoneaux, and Mr. and Mrs. Floyd, including draft objections and proposed responses; as well as correspond with Ms. Wilson regarding additional facts and documents requested by Wells Fargo and general case update	2.4	\$425	\$ 1,020.00
2019-12-17	RPN	Draft discovery responses	2.6	\$230	\$ 598.00
2019-12-17	LPL	Draft Plaintiffs' responses to Wells Fargo's second set of discovery requests; call with plaintiff Debora Granja re: same	3.8	\$465	\$ 1,767.00
2019-12-18	RPN	Prepare HITECH medical record releases from client George Floyd for production; draft 30(b)(1) deposition notice; draft answers for second sets of requests for production and interrogatories for 10 plaintiffs	1	\$230	\$ 230.00
2019-12-18	LPL	Edit, finalize, and serve Plaintiffs' responses to WF's second set of discovery responses	2.4	\$465	\$ 1,116.00

2019-12-18	LCF	Continue to work on responses to Second Requests for Production and Second Interrogatories to Mr. Frye, Ms. Wilson, Mr. and Mrs. Simoneaux, and Mr. and Mrs. Floyd, including correspond Mr. Frye regarding documents and confirm no additional, responsive documents; correspond with Mr. and Mrs. Floyd regarding facts and documents requested and confirm no additional, responsive information; correspond with Ms. Simoneaux regarding same; finalize draft responses and send to Ms. Lam to be assembled and served along with other plaintiffs' responses	4	\$425	\$ 1,700.00
2019-12-18	NRL	Worked on discovery responses; proofread discovery responses and annotated drafts with edits/ suggestions and returned to associate; assisted with finalizing responses	4.8	\$275	\$ 1,320.00
2019-12-19	LPL	E-mails with clients re: further documents to produce in response to WF's second set of RFPs	0.4	\$465	\$ 186.00
2019-12-19	RPN	Prepare documents for production; draft verification pages	2.5	\$230	\$ 575.00
2019-12-20	LCF	Continue to work on response to correspondence from Wells Fargo requesting additional address and loan information for certain clients in response to client list provided, including receive update from Mr. Neal regarding research and correspond with co-counsel regarding three individuals unable to locate	0.2	\$425	\$ 85.00

2019-12-22	LCF	Continue to work on response to correspondence from Wells Fargo requesting additional address and loan information for certain clients in response to client list provided, including review; and forward response from co-counsel regarding three individuals unable to locate and instruct Mr. Neal to update draft response with additional information; and draft update to Wells Fargo's counsel regarding anticipated timing to provide substantive response to information requested	0.2	\$425	\$ 85.00
2019-12-22	LPL	Produce additional responsive documents from Hernandez and Granja to Wells Fargo	0.4	\$465	\$ 186.00
2019-12-27	LCF	Finish response to Wells Fargo's request for additional address and loan information for certain clients in response to client list provided, including finish adding information from Mr. Neal's research of documents from clients and documents produced by Wells Fargo	0.4	\$425	\$ 170.00
2019-12-27	RPN	Prepare documents for production; prepare potential deposition exhibits	1.3	\$230	\$ 299.00
2020-01-09	LCF	Review additional, signed medical authorizations from Mr. Floyd and forward to Wells Fargo's counsel, Ms. Knight	0.1	\$425	\$ 42.50
		Project Total:	199.8		\$ 88,625.50
Project: Discovery – Meet and confer with Wells Fargo on discovery responses					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-04-22	JJB	Emails with co-counsel re meet and confer call on Wells Fargo discovery responses	0.3	\$580	\$ 174.00
2019-04-22	MLS	Emails re discovery meet/confer	0.5	\$800	\$ 400.00
2019-04-22	JJB	Prepare for meet and confer call on Wells Fargo discovery responses	0.8	\$580	\$ 464.00

2019-04-22	LCF	Continue to review and analyze Wells Fargo's responses to First Interrogatories and First Requests for Production of Documents and finish preliminary thoughts regarding objections raised in preparation for meet and confer call; research alleged privileges cited by Wells Fargo in objections, confirm meet and confer, correspond with Mr. Bloomfield regarding preparations for meet and confer	2.1	\$425	\$ 892.50
2019-04-23	LPL	Call with M. Schrag re: next steps in the meet and confer process on Wells Fargo's responses to Ps' first set of RFPs	0.3	\$465	\$ 139.50
2019-04-23	JJB	Call with co-counsel re meet and confer call with opposing counsel on Wells Fargo discovery responses	0.5	\$580	\$ 290.00
2019-04-23	LPL	E-mails and confer with J. Bloomfield and co-counsel L. Fellows re: drafting a meet and confer letter to WF following the parties' telephonic conference on WF's discovery responses	0.5	\$465	\$ 232.50
2019-04-23	MLS	Review discovery responses; prep for meet and confer re same; meet/confer w/ defense counsel re discovery responses; conf. J. Bloomfield and L. Lam re same; review/edit protective order	2.8	\$800	\$ 2,240.00

2019-04-23	LCF	Participate in meet and confer call with Wells Fargo's counsel regarding deficiencies in their responses to Plaintiff's First Interrogatories and Request for Production of Documents, including analyze Wells Fargo's responses, outline notes and thoughts regarding specific responses, research of relevant case law regarding various objections made by Wells Fargo, review Judge Alsup's standing Order regarding discovery responses, corresponded with Mr. Bloomfield regarding strategy for meet and confer; outline and analyze next steps to follow-up with Wells Fargo regarding their discovery responses and thoughts regarding specific responses, corresponded with Mr. Bloomfield regarding strategy for meet and confer and next steps after call	3.8	\$425	\$ 1,615.00
2019-04-24	LPL	Confer with J. Bloomfield and M. Schrag re: meet and confer approach regarding WF's responses to Plaintiffs' first set of requests for production	0.7	\$465	\$ 325.50
2019-04-25	LPL	Begin drafting meet and confer letter to Wells Fargo regarding its responses to Ps' first set of requests for production	0.4	\$465	\$ 186.00
2019-04-26	LPL	Confer with M. Schrag re: draft meet and confer letter on WF's responses to Plaintiffs' first set of RFPs and plan for document production	0.2	\$465	\$ 93.00
2019-04-26	LPL	Call and e-mails with co-counsel L. Fellows re: bank examination privilege and its application to documents in this case	0.4	\$465	\$ 186.00
2019-04-26	MLS	Review meet/confer letter on discovery responses;conf. L. Lam re same	0.4	\$800	\$ 320.00

2019-04-26	LCF	Continue to work on analyzing Wells Fargo's responses to Plaintiffs' First Request for Production of Documents and Interrogatories, including continue to analyze asserted bank examination privilege, correspond with Ms. Lam regarding response to the same, continue to research relevant case law regarding privilege in the Northern District of California, outline thoughts regarding the same and send to Ms. Lam	1	\$425	\$ 425.00
2019-04-26	LCF	Review and analyze Wells Fargo's most recent regulatory filings, including 1Q19 statement and the 2018 Annual Report, as well as other publicly available Wells Fargo documents to locate additional statements regarding the alleged "glitch" and other relevant information regarding corporate structure and responsibilities as it relates to scope of discovery requests to Wells Fargo; outline preliminary thoughts regarding the same	2.6	\$425	\$ 1,105.00
2019-04-26	LPL	Draft meet and confer letter regarding Wells Fargo's responses to Plaintiffs' first set of requests for production	3.8	\$465	\$ 1,767.00
2019-04-27	LPL	Continue drafting meet and confer letter to Wells Fargo regarding its responses to Plaintiffs' first set of requests for production	1.9	\$465	\$ 883.50
2019-04-28	LPL	Review M. Schrag's edits to and revise meet and confer letter to Wells Fargo regarding its responses to Plaintiffs' first set of RFPs	0.2	\$465	\$ 93.00
2019-04-28	MLS	Review/edit meet and confer letter re doc requests	0.5	\$800	\$ 400.00
2019-04-29	RMP	Draft letter regarding meet-and-confer on Wells Fargo's discovery responses	1.3	\$725	\$ 942.50
2019-04-29	LPL	Further edits to meet and confer letter to Wells Fargo re: its responses to Plaintiffs' first set of RFPs; confer with M. Schrag re: same	1.4	\$465	\$ 651.00

2019-04-29	LCF	Continue to work on meet and confer related to Wells Fargo's responses to Plaintiffs' First Request for Production of Documents, including review, analyze, and send edits to draft of correspondence confirming discussions regarding First Request for Production of Documents during meet and confer conference with Wells Fargo and proposing limitations to discovery requests; send revised draft to Ms. Lam and Mr. Schrag; correspond with Mr. Schrag, Ms. Lam, and Mr. Paul regarding proposed edits, general strategy to obtain documents, and finalizing correspondence	1.6	\$425	\$ 680.00
2019-04-29	MLS	Work on meet/confer letter re doc requests; conf. call L. Lam, R. Paul and L. Fellows re same	1.7	\$800	\$ 1,360.00
2019-05-07	RMP	Prepare for discovery conference with opposing counsel; discovery conference with opposing counsel; review and analyze motion to dismiss	0.9	\$725	\$ 652.50
2019-05-07	LCF	Continue to work on meet and confer with Wells Fargo regarding responses to First Requests for Production and First Interrogatories, including preliminarily review response to meet and confer letter regarding proposed compromises/limitations to First Requests for Production and correspond with Wells Fargo's counsel regarding the same; correspond with Wells Fargo's counsel regarding responses to First Interrogatories; begin to outline notes and compromises from call to prepare response letter	1.2	\$425	\$ 510.00
2019-05-07	MLS	Review discovery responses and A. Groves letter re discovery; meet/confer Defs. re discovery	1.5	\$800	\$ 1,200.00

2019-05-10	LPL	Review and edit co-counsel's draft discovery meet and confer letter to Wells Fargo; e-mail to M. Schrag re: same	0.8	\$465	\$ 372.00
2019-05-10	LCF	Begin to work on draft follow-up letter to Wells Fargo regarding efforts to meet and confer on their responses to Plaintiffs' First Requests for Production and to confirm meet and confer on First Set of Interrogatories, including review and analyze notes from the same and outline specific questions for further review and feedback	3.7	\$425	\$ 1,572.50
2019-05-12	MLS	Review/edit discovery letter and interrogatory response objections	1.3	\$800	\$ 1,040.00
2019-05-13	RMP	Work on letter to opposing counsel regarding discovery dispute	0.1	\$725	\$ 72.50
2019-05-13	LCF	Continue to work on draft follow-up letter to Wells Fargo regarding efforts to meet and confer on their responses to Plaintiffs' First Requests for Production and to confirm meet and confer on First Set of Interrogatories, including incorporate edits and revisions to specific requests, analyze changes with Ms. Lam and Mr. Schrag, circulate revised letter	2	\$425	\$ 850.00
2019-05-15	LCF	Finalize and send follow-up letter to Wells Fargo regarding efforts to meet and confer on their responses to Plaintiffs' First Requests for Production and to confirm meet and confer on First Set of Interrogatories, including final proofread and edit of letter	0.3	\$425	\$ 127.50
2019-05-21	LCF	Review preliminary response letter from Ms. Obi regarding remaining deficiencies in Wells Fargo's responses to Plaintiffs' First Set of Requests for Production; outline thoughts regarding response on Electronically Stored Information protocol and status of the same	0.4	\$425	\$ 170.00

2019-05-27	LCF	Preliminarily review Wells Fargo's May 24 response to Plaintiffs' further attempts to meet and confer regarding Wells Fargo's responses to Plaintiffs' First Requests for Production and First Interrogatories	0.1	\$425	\$ 42.50
2019-06-04	JJB	Review Wells Fargo correspondence and supplementary discovery responses	0.5	\$580	\$ 290.00
2019-06-04	MLS	Meet confer def. counsel re depo schedule; conf. L. Lam re 30b6 for WFC and bank meet/confer; conf. R. Paul re discovery plan	1.7	\$800	\$ 1,360.00
2019-06-19	LCF	Continue to analyze applicability of bank examination privilege as asserted by Wells Fargo, including review and analyze preliminary research and provide feedback regarding additional research needed; begin to review additional research regarding the bank examination privilege	0.6	\$425	\$ 255.00
2019-06-19	GRB	Research available privileges in California and draft memorandum summarizing findings	4.5	\$275	\$ 1,237.50
2019-06-20	LCF	Continue to work on review and analysis of Wells Fargo's discovery responses and documents to prepare for letter brief/motion to compel, including begin to outline thoughts regarding remaining deficiencies with specific responses	0.4	\$425	\$ 170.00
2019-06-21	LCF	Continue to work on review and analysis of Wells Fargo's discovery responses and documents to prepare for letter brief/motion to compel, including begin to outline thoughts regarding remaining deficiencies with specific responses	1.7	\$425	\$ 722.50
2019-06-21	MLS	Tel. call L. Fellows re discovery (prep for meet/confer); meet/confer WF counsel re plaintiffs' responses, 30b6 and def doc production	2.5	\$800	\$ 2,000.00

2019-06-21	LCF	Participate in meet and confer conference with Wells Fargo's counsel regarding Plaintiffs' discovery responses and alleged deficiencies as well as remaining disputes for 30(b)(6) deposition topics; including prepare for the same by reviewing and analyzing letter from Wells Fargo outlining alleged deficiencies, review and outline notes from Ms. Lam regarding response to each alleged issue; correspond with Mr. Schrag to outline and analyze outstanding discovery tasks, timing to complete the same, and additional information needed to prepare for class certification, including reviewing and analyzing specific "hot" documents with Mr. Schrag	2.6	\$425	\$ 1,105.00
2019-06-26	LCF	Begin to review Wells Fargo's June 25 letter regarding Plaintiffs' discovery responses demanding a response by June 1 and outlining timing to finalize their supplemental document production	0.2	\$425	\$ 85.00
2019-06-30	LCF	Assist with preparations for meet and confer conference regarding Wells Fargo's and Plaintiffs' discovery letters related to 30(b)(6) deposition topics and Plaintiffs' Request Numbers 16-20, including summarize disputes and positions for the same for Mr. Paul, review and analyze Wells Fargo's response to Plaintiffs' discovery letter and prior correspondence to outline thoughts in summary; correspond with Ms. Lam regarding meet and confer and analyze specific factual questions with and Ms. Lam	2	\$425	\$ 850.00
2019-07-10	AGS	Work on meet and confer discovery letter; review documents	1.9	\$575	\$ 1,092.50
2019-07-15	LPL	Edits to meet and confer letter on Wells Fargo's ESI searches	0.3	\$465	\$ 139.50

2019-07-15	LPL	Draft e-mail to Wells Fargo re: meet and confer on motion to de-designate certain documents as confidential	0.8	\$465	\$ 372.00
2019-07-18	AGS	Read correspondence from defense counsel regarding document production meet and confer and respond	0.1	\$575	\$ 57.50
2019-07-18	RMP	Review correspondence regarding discovery issues and stipulation on briefing schedule	0.2	\$725	\$ 145.00
2019-07-28	AGS	Read Wells Fargo's response to our Electronically Stored Information meet-and-confer letter; analyze responsiveness; respond to G. Scavo to set time this week to meet and confer on additional search terms	0.4	\$575	\$ 230.00
2019-07-30	AGS	Respond to G. Scavo regarding Electronically Stored Information conference call for July 31; review memorandum from co-counsel regarding Wells Fargo's failure to produce Instant Messages after deposition testimony that Instant Message was primary means of communicating within Wells Fargo	0.2	\$575	\$ 115.00
2019-07-31	AGS	Work on response to Gretchen Scavo regarding Electronically Stored Information meet and confer	0.1	\$575	\$ 57.50
2019-08-01	LCF	Participate in Electronically Stored Information "meet and confer" call with Ms. Scavo and Ms. Ireland regarding Mr. Pfeil's documents and other Electronically Stored Information issues/questions, including review notes from prior calls to prepare for the same	0.5	\$425	\$ 212.50

2019-08-02	LCF	Begin to draft response/follow-up letter to Ms. Scavo regarding various Electronically Stored Information concerns raised during meet and confer conference, including analyze various versions of Mr. Pfeil's employee review and outline concerns regarding redactions and proposed compromises, draft proposed search terms related to Mr. Pfeil, locate and summarize documents referencing StarWeb	2	\$425	\$ 850.00
2019-08-05	JMC	Verifying documents in defendant privilege log	1.5	\$85	\$ 127.50
2019-08-17	LCF	Review correspondence from Wells Fargo regarding supplemental document production regarding Request for Production of Documents 18 and 20, send production to Ms. John to upload, review Judge Alsup's Order and outline thoughts regarding additional documents forthcoming	0.2	\$425	\$ 85.00
2019-10-25	LCF	Receive update from Mr. Schrag regarding result of meet and confer with Wells Fargo's counsel regarding scheduling additional depositions, settlement conference procedures and timing, and accuracy of information to class members	0.2	\$425	\$ 85.00
2019-10-29	LCF	Begin to draft correspondence to Ms. Groves regarding concerns with respect to Wells Fargo's designation of documents as purportedly privileged and/or confidential	0.3	\$425	\$ 127.50
2019-10-30	LCF	Continue to outline follow-up correspondence to Ms. Groves regarding outstanding privilege and confidentiality over-designation questions	0.9	\$425	\$ 382.50
2019-11-13	LCF	Outline and analyze thoughts regarding assertion of mediation privilege and whether further meet and confer needed with respect to specific documents; circulate thoughts to team	0.2	\$425	\$ 85.00

2019-11-13	LPL	Draft meet and confer letter on Wells Fargo's response to interrogatory on terms of class members' would-be modified mortgages	1.1	\$465	\$ 511.50
2019-11-13	MLS	Tel. calls L. Lam re contract discovery issues; review draft letter and discovery requests	1.3	\$800	\$ 1,040.00
2019-11-14	LCF	Review draft meet and confer letter to Wells Fargo regarding class members' information and contract types from Ms. Lam; confirm no edits to the same; review and provide feedback regarding final package of additional discovery requests to Wells Fargo and final meet and confer letter	0.4	\$425	\$ 170.00
2019-11-14	LPL	Edits to meet and confer letter to WF on WF's response to Interrogatory 7 and RFP 11; confer with M. Schrag re: same	1.5	\$465	\$ 697.50
2019-11-14	MLS	Review/edit meet and confer letter re damages and contract evidence; conf L. Lam re same; tel. call R. Paul re same	1.5	\$800	\$ 1,200.00
2019-11-16	MLS	Review meet/confer letter and discovery requests emails re same and damages	0.7	\$800	\$ 560.00
2019-11-18	LPL	Call with M. Schrag and defense counsel re: meet and confer on mediation privilege, updated CIT chart, and the full range of contracts that class members have	0.5	\$465	\$ 232.50
2019-11-18	LPL	E-mails with M. Schrag, team, and defense counsel re: meet and confer on updated CIT chart, mediation privilege, and the range of contracts that class members have	0.5	\$465	\$ 232.50
2019-11-18	MLS	Prep for meet/confer; meet/confer def. counsel re contract info and mediation priv.; review/edit confirming email	2	\$800	\$ 1,600.00
2019-11-19	LPL	E-mails with defense counsel re: WF's production of unnamed CA class member's security instruments, sealing, and motion for leave to amend	0.4	\$465	\$ 186.00

2019-11-21	LPL	Review Plaintiff Granja's cap sheet in preparation for call with defense counsel to meet and confer on WF's production of cap sheets	0.3	\$465	\$ 139.50
2019-11-21	LCF	Assist with continued meet and confer with Wells Fargo's counsel regarding class member information, including review and analyze multiple emails between counsel regarding the same; correspond with Ms. Lam regarding facts learned at Ms. Reimers' deposition and potential impact on upcoming meet and confer	0.4	\$425	\$ 170.00
2019-11-21	LPL	Conf. call with M. Schrag and defense counsel re: named plaintiffs' cap sheets on modified loan terms and how to read them	0.5	\$465	\$ 232.50
2019-11-21	MLS	Prep for meet confer and meet confer re plaintiff cap sheets	0.5	\$800	\$ 400.00
2019-12-17	LCF	Call with Wells Fargo's counsel, Ms. Scavo, regarding specific document production questions, as well as criminal history question raised during Mr. Hayden's deposition	0.2	\$425	\$ 85.00
2019-12-17	LCF	Review correspondence from Wells Fargo requesting additional address and loan information for certain clients in response to client list provided, analyze request	0.3	\$425	\$ 127.50
2019-12-17	LCF	Draft letter to Wells Fargo to meet and confer regarding their responses to Plaintiffs' First Request for Admissions, Third and Fourth Interrogatories, and Second and Third Requests for Production, including review and analyze responses and outline thoughts regarding need to follow-up regarding specific requests and correspond with Ms. Lam regarding whether follow-up needed regarding class members' loan information	2.3	\$425	\$ 977.50

2019-12-18	LCF	Finalize and send letter to Wells Fargo to meet and confer regarding their responses to Plaintiffs' First Request for Admissions, Third and Fourth Interrogatories, and Second and Third Requests for Production, including proofread and edit final draft	0.4	\$425	\$ 170.00
2019-12-23	LCF	Review email from Ms. Groves requesting clarification on documents referenced in meet and confer letter, confirm correct document with Ms. Lam, and review response	0.1	\$425	\$ 42.50
2019-12-30	LCF	Prepare for meet and confer call with Wells Fargo regarding responses to outstanding discovery requests, including correspond with Mr. Bloomfield regarding participating in call, and forward call-in information	0.2	\$425	\$ 85.00
2019-12-30	JJB	Preparation for meet and confer call with Wells Fargo counsel	0.8	\$580	\$ 464.00
2019-12-31	JJB	Meet and confer call with Wells Fargo counsel re pending discovery disputes	0.5	\$580	\$ 290.00
2019-12-31	RMP	Work on various discovery disputes; prepare for depositions	0.5	\$725	\$ 362.50
2019-12-31	LCF	Attempt to have meet and confer call with Wells Fargo's counsel as scheduled, including attempt to substantively review deficiencies with Wells Fargo's responses, as well as review deposition scheduling and next steps; including review and analyze December 18 meet and confer letter and outline notes in preparation for call; draft update to the team after call; correspond with the team regarding potential next steps and scheduling remaining depositions of Wells Fargo's employees; and summarize task list after call and circulate to team; begin to analyze Wells Fargo's contention that we have taken more than the allowed 10 depositions and send around thoughts regarding same	2.1	\$425	\$ 892.50

2020-01-16	LPL	E-mail to defense counsel re: inquiry about cap sheets that may be missing from the production	0.2	\$465	\$ 93.00
		Project Total:	87.7		\$ 45,675.00
Project: Document review					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-01-07	LCF	Correspond with co-counsel regarding status of document review and obtaining access to database with documents collected	0.1	\$425	\$ 42.50
2019-04-01	LCF	Review supplemental document production for Plaintiff Ms. White, outline thoughts regarding coding and tracking of documents produced	0.3	\$425	\$ 127.50
2019-05-30	KDJ	Process Wells Fargo's document production; work on document review procedures	1	\$250	\$ 250.00
2019-05-31	LCF	Review correspondence from Wells Fargo with initial production and letter regarding the same	0.1	\$425	\$ 42.50
2019-05-31	AGS	Call with team; prepare for depositions; get bids for document review platform; multiple calls with vendors	0.6	\$575	\$ 345.00
2019-06-02	AGS	Finalize agreement with Everlaw for document review platform; send communication to Gibbs Law Group regarding same; establish parameters and review protocols	0.9	\$575	\$ 517.50
2019-06-03	KDJ	Meeting with Everlaw regarding implementation of document review software	1	\$250	\$ 250.00
2019-06-03	LCF	Begin to review documents produced by Wells Fargo, including receive training from Everlaw regarding process and procedure to review documents	1	\$425	\$ 425.00
2019-06-03	AGS	Work on discovery plan; meeting regarding depositions; work on setting up Everlaw; communications w/vendor; draft issue and ranking codes	2	\$575	\$ 1,150.00

2019-06-04	KDJ	Implement procedures for document review	0.5	\$250	\$	125.00
2019-06-04	AGS	Continue setting up search options and codes in Everlaw database; begin document review	1.3	\$575	\$	747.50
2019-06-05	KDJ	Upload second document production into Everlaw	0.1	\$250	\$	25.00
2019-06-05	GRB	Compile and organize privileged documents collection	2.5	\$275	\$	687.50
2019-06-05	JMC	Document review of Wells Fargo production	2.5	\$85	\$	212.50
2019-06-05	LCF	Begin to review, analyze, and subjectively code documents produced by Wells Fargo; outline thoughts regarding facts learned regarding the alleged error in this matter from the same	5.2	\$425	\$	2,210.00
2019-06-05	AGS	Continue document review of Wells Fargo First and Second Productions; identify hot documents	6	\$575	\$	3,450.00
2019-06-06	KDJ	Upload two additional document productions	0.1	\$250	\$	25.00
2019-06-06	AGS	Review hot documents; review May 2015 Wells Fargo Company and Wells Fargo Bank Resolution Plan and analyze same for facts to support Company's involvement in the risk management of Bank; work on Key Players list; communications with Everlaw on changes to document review protocol; review signed Protective Order from Everlaw	1.1	\$575	\$	632.50
2019-06-06	LCF	Continue to review, analyze, and subjectively code documents produced by Wells Fargo; instruct Mr. Brand regarding assisting with document review, including outlining specific categories of documents and information for which to code and note	2.2	\$425	\$	935.00
2019-06-06	JMC	Document review of Wells Fargo First Production	2.6	\$85	\$	221.00
2019-06-10	KDJ	Load additional document productions to Everlaw for review	0.3	\$250	\$	75.00
2019-06-11	MLS	Review documents	2.2	\$800	\$	1,760.00

2019-06-11	GRB	Review documents produced and code for issues and hot documents	8.5	\$275	\$ 2,337.50
2019-06-12	KDJ	Upload new Wells Fargo document productions; communications with Everlaw	0.4	\$250	\$ 100.00
2019-06-12	RMP	Work on document review for deposition preparation and advancing litigation; work on discovery plan	1.6	\$725	\$ 1,160.00
2019-06-12	GRB	Review documents produced and code for issues and hot documents	8	\$275	\$ 2,200.00
2019-06-13	KDJ	Upload new document productions; communications with Everlaw regarding lack of load files	0.3	\$250	\$ 75.00
2019-06-13	GRB	Review documents produced and code for issues and hot documents	7.5	\$275	\$ 2,062.50
2019-06-14	LPL	Confer with M. Schrag and co-counsel L. Fellows re: staffing for document review	0.3	\$465	\$ 139.50
2019-06-14	LCF	Call with co-counsel regarding next steps and general case strategy in light of depositions and discovery production, including outline next steps regarding document review, production, and ongoing depositions	1.3	\$425	\$ 552.50
2019-06-14	GRB	Review documents produced and code for issues and hot documents	7.5	\$275	\$ 2,062.50
2019-06-17	LCF	Continue to work on review, analysis, and subjective coding of first document production from Wells Fargo	0.8	\$425	\$ 340.00
2019-06-17	GRB	Review documents produced and code for issues and hot documents	9	\$275	\$ 2,475.00
2019-06-18	LCF	Continue to work on review and analysis of documents produced by Wells Fargo, analyze next steps to finalize plaintiff specific document production, including meet with Ms. Cowger to instruct her regarding how to review documents, update plaintiff specific document codes and confirm Ms. Cowger to begin reviewing plaintiff specific documents	1.2	\$425	\$ 510.00
2019-06-18	GRB	Review documents produced and code for issues and hot documents	2.5	\$275	\$ 687.50
2019-06-18	JMC	Document review and coding	4.8	\$85	\$ 408.00

2019-06-20	KDJ	Upload new document productions; review productions to determine which still have issues and need reproduced	0.5	\$250	\$ 125.00
2019-06-21	MLS	Review hot docs	1.5	\$800	\$ 1,200.00
2019-06-24	KDJ	Upload new document productions; communications with Everlaw regarding duplicative productions	0.5	\$250	\$ 125.00
2019-06-24	LPL	Review and analyze certain hot docs produced by Wells Fargo	0.5	\$465	\$ 232.50
2019-06-25	LCF	Continue to review, analyze, and subjectively code first set of substantive, general case documents produced by Wells Fargo and continue to outline thoughts regarding documents and facts learned	4.8	\$425	\$ 2,040.00
2019-06-25	JMC	Discovery document review and coding	7.5	\$85	\$ 637.50
2019-06-26	LCF	Continue to work on finalizing review and uploading of Wells Fargo's documents to Everlaw, including analyze issue with specific production and whether coding needs to be saved with Ms. John as well as update Ms. John regarding understanding that Wells Fargo's document production related to specific plaintiffs now finished	0.1	\$425	\$ 42.50
2019-06-26	LCF	Continue to review, analyze, and subjectively code first set of substantive, general case documents produced by Wells Fargo and continue to outline thoughts regarding documents and facts learned	1.2	\$425	\$ 510.00
2019-06-26	JMC	Discovery document review and coding	6.8	\$85	\$ 578.00
2019-06-27	JMC	Discovery document review and coding	8.1	\$85	\$ 688.50
2019-06-28	RMP	Review hot documents to prepare for depositions	1.2	\$725	\$ 870.00

2019-07-02	AGS	Review and code new document production from Wells Fargo; analyze correspondence regarding what was produced and what was withheld; analyze next steps in meet and confer process on search terms and date range that Wells Fargo has searched	1.2	\$575	\$ 690.00
2019-07-02	LCF	Continue to review and analyze documents produced by Wells Fargo, including begin to analyze selected "hot" documents and outline thoughts and timeline regarding the same	1.3	\$425	\$ 552.50
2019-07-02	GRB	Review and code new set of documents produced by Wells Fargo	1.5	\$275	\$ 412.50
2019-07-02	JMC	Discovery document review and coding	2.6	\$85	\$ 221.00
2019-07-03	JMC	Discovery document review and coding	0.2	\$85	\$ 17.00
2019-07-03	GRB	Review new set of documents produced by defendant	3.5	\$275	\$ 962.50
2019-07-03	LPL	Review and analyze hot documents that have been culled out by co-counsel	4.6	\$465	\$ 2,139.00
2019-07-05	LCF	Review most recent 10-K regulatory filing and Wells Fargo's updated disclosure in the same regarding the error in this matter, compare disclosure to prior 10-K filings, and outline thoughts and analysis regarding the same	0.5	\$425	\$ 212.50
2019-07-05	JJB	Review hot case documents	3.3	\$580	\$ 1,914.00
2019-07-08	KDJ	Upload new document production to Everlaw	0.2	\$250	\$ 50.00
2019-07-08	GRB	Review new set of documents produced by defendant	4	\$275	\$ 1,100.00
2019-07-09	JMC	Discovery document review and coding	0.1	\$85	\$ 8.50
2019-07-09	KDJ	Upload new document production; communications with Everlaw and correct prior upload	0.5	\$250	\$ 125.00
2019-07-10	RMP	Review hot documents	1.5	\$725	\$ 1,087.50
2019-07-15	JMC	Coding documents for relevance and hot documents	0.2	\$85	\$ 17.00
2019-07-15	MLS	Review hot docs	0.8	\$800	\$ 640.00

2019-07-15	LCF	Continue to review and analyze Wells Fargo's document production and outline next steps to review same in advance of 30(b)(6) deposition, including begin to review and subjectively code documents produced	2.3	\$425	\$ 977.50
2019-07-16	LCF	Continue to review, analyze, and subjectively code documents produced by Wells Fargo, including begin to outline and analyze thoughts regarding facts learned and additional lines of inquiry; analyze additional 10,000 documents produced by Wells Fargo, including analyze method to review same and custodians produced	4.1	\$425	\$ 1,742.50
2019-07-16	GRB	Review documents produced and code for issues and hot documents	4.3	\$275	\$ 1,182.50
2019-07-17	LPL	Call and e-mails with co-counsel L. Fellows re: reviewing the latest large batch of documents that Wells Fargo produced	0.4	\$465	\$ 186.00
2019-07-17	LCF	Continue to review, analyze, and subjectively code documents produced by Wells Fargo, including continue to outline and analyze thoughts regarding facts learned and additional lines of inquiry; correspond with Ms. Lam regarding next steps to divide and complete review of the additional 10,000 documents produced by Wells Fargo	5.1	\$425	\$ 2,167.50
2019-07-17	GRB	Review documents produced and code for issues and hot documents	7.2	\$275	\$ 1,980.00
2019-07-18	LCF	Review Wells Fargo July 17 production of an additional approximately 500 documents, including review cover letter outlining custodians produced	0.1	\$425	\$ 42.50
2019-07-18	MLS	Review hot docs	2	\$800	\$ 1,600.00
2019-07-18	GRB	Review documents produced and code for issues and hot documents	7.1	\$275	\$ 1,952.50

2019-07-18	LCF	Continue to review, analyze, and subjectively code documents produced by Wells Fargo, including continue to outline and analyze thoughts regarding facts learned and additional lines of inquiry and begin to draft timeline based upon documents reviewed to-date	8.2	\$425	\$ 3,485.00
2019-07-19	MLS	Review correspondence re document production	0.2	\$800	\$ 160.00
2019-07-19	GRB	Review documents produced and code for issues and hot documents	3.2	\$275	\$ 880.00
2019-07-19	LPL	Document review	3.6	\$465	\$ 1,674.00
2019-07-19	LCF	Continue to review, analyze, and subjectively code documents produced by Wells Fargo, including continue to outline and analyze thoughts regarding facts learned and additional lines of inquiry and continue to draft timeline based upon documents reviewed to-date; correspond with Ms. Lam regarding facts learned through document review and documents assigned to her for review	4.7	\$425	\$ 1,997.50
2019-07-20	LCF	Continue to summarize, outline, and analyze thoughts regarding facts learned and additional lines of inquiry related to error generally and Wells Fargo's systems, as well as continue to draft timeline based upon documents reviewed to-date	1	\$425	\$ 425.00
2019-07-21	LCF	Continue to draft lengthy, comprehensive summary of facts learned and additional lines of inquiry related to error generally and Wells Fargo's systems, as well as continue to draft timeline based upon documents reviewed to-date	5.8	\$425	\$ 2,465.00

2019-07-22	LCF	Finish lengthy, comprehensive summary of facts learned and additional lines of inquiry related to error generally and Wells Fargo's systems and circulate the same to team; continue to review, analyze, and subjectively code documents produced by Wells Fargo	4.4	\$425	\$ 1,870.00
2019-07-22	GRB	Review documents produced and code for issues and hot documents	7.4	\$275	\$ 2,035.00
2019-07-23	AGS	Analyze and fix issue within Everlaw database dealing with reproduced documents with redactions and how to remap the documents in the Everlaw system to ensure consistency	0.3	\$575	\$ 172.50
2019-07-23	KDJ	Review communication from opposing counsel regarding new document production; upload production; communications with document administrator regarding issues with new productions	0.5	\$250	\$ 125.00
2019-07-24	GRB	Review documents produced and code for issues and hot documents	6.6	\$275	\$ 1,815.00
2019-07-25	MLS	Review hot docs	0.7	\$800	\$ 560.00
2019-07-25	JJB	Review B. Potter documents newly produced by Wells Fargo	1.7	\$580	\$ 986.00
2019-07-26	GRB	Review capsheets and categorize modification denial information on spreadsheet	4.2	\$275	\$ 1,155.00
2019-07-29	GRB	Review documents produced and code for issues and hot documents	2.3	\$275	\$ 632.50
2019-07-30	KDJ	Process new document production from Wells Fargo	0.2	\$250	\$ 50.00
2019-07-30	MLS	Review hot docs	0.7	\$800	\$ 560.00
2019-07-30	GRB	Review documents produced and code for issues and hot documents	8.2	\$275	\$ 2,255.00
2019-07-31	GRB	Review documents produced and code for issues and hot documents	6.8	\$275	\$ 1,870.00
2019-08-01	GRB	Review documents produced and code for issues and hot documents	8.4	\$275	\$ 2,310.00
2019-08-02	LPL	E-mails with co-counsel L. Fellows re: doc review assignment for new staff attorney	0.3	\$465	\$ 139.50

2019-08-02	JMC	Verifying documents in defendant privilege log	1	\$85	\$ 85.00
2019-08-05	GRB	Review documents produced and catalog them in document management system	1.1	\$275	\$ 302.50
2019-08-06	LCF	Analyze status of documents received from Wells Fargo and whether they have been reviewed and/or uploaded to our database for review; outline thoughts regarding additional documents recently received and forward all remaining productions to Ms. John to be uploaded	0.4	\$425	\$ 170.00
2019-08-06	NS	Meeting with Linda Lam re: case background.	0.4	\$415	\$ 166.00
2019-08-06	LPL	Confer with N. Shah re: factual and procedural background on case, and process for document review; help him get set up for starting work on the case	0.5	\$465	\$ 232.50
2019-08-06	NS	Completing review of Document Review Notes.	0.5	\$415	\$ 207.50
2019-08-06	NS	Phone call with Laura Fellows re: document review.	1.5	\$415	\$ 622.50
2019-08-06	GRB	Review documents produced and code for issues and hot documents	1.6	\$275	\$ 440.00
2019-08-06	LCF	Correspond with Mr. Shah to train him regarding document review, including types of documents to specifically analyze, coding, and outline general case history and facts; analyze and prepare first "batch" of documents for Mr. Shah to review and subjectively code	1.7	\$425	\$ 722.50
2019-08-06	NS	Conducting document review (Custodian Liggett).	4.1	\$415	\$ 1,701.50
2019-08-07	GRB	Review documents produced and code for issues and hot documents	2.3	\$275	\$ 632.50
2019-08-07	NS	Continuing Document Review (Custodian Liggett, J)	8.5	\$415	\$ 3,527.50
2019-08-08	NS	WF Document Review (Custodian Liggett, J)	5.2	\$415	\$ 2,158.00
2019-08-09	RMP	Review hot documents	1.5	\$725	\$ 1,087.50
2019-08-09	NS	Reviewing WF Documents (Custodian Liggett, J)	4.4	\$415	\$ 1,826.00

2019-08-12	RMP	Review hot documents	1.5	\$725	\$ 1,087.50
2019-08-12	NS	Reviewing WF documents (Custodian Liggett, J)	6.3	\$415	\$ 2,614.50
2019-08-13	NS	WF Document Review (Custodian Liggett, J)	6.8	\$415	\$ 2,822.00
2019-08-14	NS	WF Document Review (Custodian: Liggett, J)	6.8	\$415	\$ 2,822.00
2019-08-15	NS	WF document review (Custodian Liggett, J)	2.2	\$415	\$ 913.00
2019-08-16	NS	WF Document Review (Custodian: Liggett, J)	2.5	\$415	\$ 1,037.50
2019-08-17	LCF	Analyze status of document review, including reviewing documents from various email custodians and analyzing priority of assigning specific sets for review; assign Mr. Shah additional documents review for next two weeks and summarize review for Mr. Shah	2	\$425	\$ 850.00
2019-08-19	LCF	Continue to work on document review and next steps and document review priorities, including outline and analyze assignments/division of labor to Mr. Leyh, as well as analyze outstanding Electronically Stored Information questions/issues	0.3	\$425	\$ 127.50
2019-08-19	AGS	Train N. Leyh on case background and document review protocol	1.2	\$575	\$ 690.00
2019-08-19	NS	WF Document Review (Custodian Liggett, J)	3	\$415	\$ 1,245.00

2019-08-20	LCF	Assist with adding new document reviewer, Mr. Leyh, including preliminarily outline document review status and next steps to get started with review and issues to look out for; including analyze potential document to assign to Mr. Leyh and send initial "batch" to him; continue to work on analysis of documents alleged to be privileged, including outline potential next steps and division of labor to complete review; receive confirmation that most recently produced documents related to Request for Production Number 18 and 20 uploaded to Everlaw, assign same to Mr. Shah for review, and draft correspondence to Mr. Shah outlining types of documents to be within production and to prioritize review	0.8	\$425	\$ 340.00
2019-08-20	NS	Preparation for and phone call with Nick Leyh re: WF document review protocol and coding; training follow-up to provide feedback.	1.3	\$415	\$ 539.50
2019-08-20	NS	WF Document Review (High Priority - Audit Cmt and Board Docs)	2.6	\$415	\$ 1,079.00
2019-08-20	NS	WF Document Review (Custodian: Liggett, J)	4.1	\$415	\$ 1,701.50
2019-08-20	NRL	Reviewed documents in Everlaw; call for training on Everlaw and explanation of coding documents; reviewed documents in Everlaw and coded	4.8	\$275	\$ 1,320.00
2019-08-21	LCF	Continue to work on analysis of documents alleged to be privileged, including meet with Mr. Leyh to instruct him regarding privilege review and analysis and review notes and obtain samples to discuss with him; finish initial instructions/training with Mr. Leyh regarding document review project in general and types of documents he should expect to see, as well as legal analysis to apply in review	0.7	\$425	\$ 297.50

2019-08-21	NS	Communicating with co-counsel re: WF document review	0.7	\$415	\$ 290.50
2019-08-21	NRL	Met to discuss document review process and specific coding; met to discuss privilege log project and analysis of privilege assertions and formatting analysis and log into a spreadsheet; reviewed Wells Fargo production on Everlaw; coded documents on Everlaw	5.6	\$275	\$ 1,540.00
2019-08-21	NS	WF Document Review	8.3	\$415	\$ 3,444.50
2019-08-22	NS	Communicating with co-counsel re: WF document review	0.8	\$415	\$ 332.00
2019-08-22	NRL	Reviewed Wells Fargo production on Everlaw; coded documents on Everlaw; reviewed particular document for inconsistent assertion of privilege	3	\$275	\$ 825.00
2019-08-22	NS	WF Document Review	4	\$415	\$ 1,660.00
2019-08-23	NS	WF Document Review	9.8	\$415	\$ 4,067.00
2019-08-26	NRL	Continued document review assignment; continued coding documents	0.7	\$275	\$ 192.50
2019-08-26	NS	Researching and drafting document review summary.	2	\$415	\$ 830.00
2019-08-27	NS	WF Document Review re: origin of the glitch	4.3	\$415	\$ 1,784.50
2019-08-28	NS	WF Document Review re: origin of the glitch	1.1	\$415	\$ 456.50
2019-08-29	NRL	Reviewed documents in assignment folder on Everlaw; coded documents according to content	5.2	\$275	\$ 1,430.00
2019-08-30	NRL	Reviewed documents in assignment folder on Everlaw; coded documents according to content	5.5	\$275	\$ 1,512.50
2019-09-03	AGS	Follow up with defense counsel on Plaintiffs' request from August 7 for Dan Pfiel search and other new search requests	0.1	\$575	\$ 57.50
2019-09-03	NS	Communicating with co-counsel re: WF document review.	0.3	\$415	\$ 124.50
2019-09-03	LCF	Continue to subjectively review, analyze, and outline thoughts regarding documents produced by Wells Fargo	1	\$425	\$ 425.00

2019-09-03	NRL	Read second privilege log; began to create second privilege log in excel	1.1	\$275	\$ 302.50
2019-09-03	RMP	Review hot documents	1.5	\$725	\$ 1,087.50
2019-09-03	NRL	Reviewed and coded documents in assignment folder	2.2	\$275	\$ 605.00
2019-09-03	NS	WF Document Review	7	\$415	\$ 2,905.00
2019-09-04	LCF	Review response from Ms. Scavo regarding searching Mr. Pfeil's email account and searching StarWeb and other custodians, including begin to draft response to outline proposed redactions to each page of Mr. Pfeil's employee review and analyze three different versions produced by Wells Fargo to assist with analysis of potentially agreeable redactions	0.7	\$425	\$ 297.50
2019-09-04	NRL	Reviewed and coded documents in assignment folder on Everlaw	1.5	\$275	\$ 412.50
2019-09-04	NS	WF Document Review	5.5	\$415	\$ 2,282.50
2019-09-05	NRL	Reviewed and coded documents in my assignment folder on Everlaw	1.3	\$275	\$ 357.50
2019-09-05	RMP	Review hot documents	1.5	\$725	\$ 1,087.50
2019-09-05	NS	WF Document Review	2.1	\$415	\$ 871.50
2019-09-06	NS	Communicating with co-counsel re: WF document review.	0.2	\$415	\$ 83.00
2019-09-06	NS	Review and drafting notes re: document review	0.3	\$415	\$ 124.50
2019-09-06	RMP	Review and analyze hot documents for use for future depositions	1.5	\$725	\$ 1,087.50
2019-09-06	LCF	Continue to subjectively review, analyze, and outline thoughts regarding documents produced by Wells Fargo	2	\$425	\$ 850.00
2019-09-06	NS	WF Document Review	6.7	\$415	\$ 2,780.50
2019-09-06	NRL	Reviewed and coded documents on Everlaw in my assignment folder; discussed certain documents with co-counsel to determine proper coding labels	7.1	\$275	\$ 1,952.50
2019-09-09	NS	Communicating with co-counsel re: WF document review.	0.3	\$415	\$ 124.50
2019-09-09	LCF	Continue to subjectively review, analyze, and outline thoughts regarding documents produced by Wells Fargo	1.1	\$425	\$ 467.50

2019-09-09	NRL	Reviewed and coded documents in my assignment folder on Everlaw; finished assignment	1.2	\$275	\$ 330.00
2019-09-09	RMP	Review hot documents going forward	1.4	\$725	\$ 1,015.00
2019-09-09	NS	WF Document Review	5.6	\$415	\$ 2,324.00
2019-09-09	NRL	Recreated privilege log (second) in excel; conducted initial analysis on whether documents had reasonable assertion of privilege; created folder with referenced documents	6.7	\$275	\$ 1,842.50
2019-09-10	LCF	Review correspondence regarding and additional production from Wells Fargo, forward to Ms. John to be uploaded to Everlaw	0.1	\$425	\$ 42.50
2019-09-10	NRL	Continued creating privilege log (second) in excel; performed initial analysis of documents claiming privilege; downloaded privileged documents into folder from Everlaw	4.5	\$275	\$ 1,237.50
2019-09-10	NS	WF Document Review	4.9	\$415	\$ 2,033.50
2019-09-10	LCF	Continue to subjectively review, analyze, and outline thoughts regarding documents produced by Wells Fargo; begin second level review of documents marked "hot" since approximately late July 2019, including analyze and assist with removing duplicates and partial email chains, as well as remove documents unrelated to specific error in this case	7.8	\$425	\$ 3,315.00
2019-09-11	NS	Reviewing document and drafting notes re: decimal issue	0.6	\$415	\$ 249.00
2019-09-11	RPN	Review hot documents for purposes of future depositions, hearings, or trials	1.2	\$230	\$ 276.00
2019-09-11	LCF	Continue to conduct second level review of documents marked "hot" since approximately late July 2019, including analyze and assist with removing duplicates and partial email chains, as well as remove documents unrelated to specific error in this case	1.9	\$425	\$ 807.50

2019-09-11	LCF	Begin to review, analyze, and subjectively code most recent document production from Wells Fargo regarding remediation generally, additional "early" 2015 documents related to the error, and various general testing and procedure documents	2.6	\$425	\$ 1,105.00
2019-09-11	NS	WF Document Review	3.5	\$415	\$ 1,452.50
2019-09-11	NRL	Continued creating privilege log (second) in excel; performed initial analysis of documents claiming privilege	4.4	\$275	\$ 1,210.00
2019-09-12	LCF	Continue to draft response to Ms. Scavo regarding searching Mr. Pfeil's email account and searching StarWeb and other custodians, as well as proposed redactions to each page of Mr. Pfeil's employee review	0.3	\$425	\$ 127.50
2019-09-12	LCF	Continue to review, analyze, and subjectively code most recently document production from Wells Fargo regarding remediation generally, additional "early" 2015 documents related to the error, and various general testing and procedure documents	2.7	\$425	\$ 1,147.50
2019-09-12	RPN	Review hot documents for purposes of future depositions, hearings, or trials	2.8	\$230	\$ 644.00
2019-09-12	NRL	Continued creating privilege log (second) in excel; performed initial analysis of documents claiming privilege; downloaded privileged documents into folder from Everlaw	2.9	\$275	\$ 797.50
2019-09-12	LCF	Continue to assist with second level review of documents marked "hot" since approximately late July 2019, including analyze and assist with removing duplicates and partial email chains, as well as remove documents unrelated to specific error in this case	3.2	\$425	\$ 1,360.00
2019-09-12	NS	WF Document Review	4.9	\$415	\$ 2,033.50

2019-09-13	LCF	Finish draft response to Ms. Scavo regarding searching Mr. Pfeil's email account and searching StarWeb and other custodians, as well as proposed redactions to each page of Mr. Pfeil's employee review	0.5	\$425	\$ 212.50
2019-09-13	LPL	Review and analyze latest documents that have been marked as hot	1.1	\$465	\$ 511.50
2019-09-13	RPN	Review hot documents for purposes of future depositions, hearings, or trials	1.9	\$230	\$ 437.00
2019-09-13	LCF	Finish second level review of documents marked "hot" since approximately late July 2019, including analyze and assist with removing duplicates and partial email chains, as well as remove documents unrelated to specific error in this case	2.8	\$425	\$ 1,190.00
2019-09-13	NS	WF Document Review	3.2	\$415	\$ 1,328.00
2019-09-13	LCF	Finish review, analysis, and subjective coding of most recent document production from Wells Fargo regarding remediation generally, additional "early" 2015 documents related to the error, and various general testing and procedure documents; outline categories of documents and draft summary of production, including specific examples	4.2	\$425	\$ 1,785.00
2019-09-16	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.7	\$230	\$ 161.00
2019-09-16	RMP	Review hot documents in preparation for class certification briefing and for trial	1.8	\$725	\$ 1,305.00
2019-09-16	NS	WF Document Review	3	\$415	\$ 1,245.00
2019-09-16	LCF	Review and subjectively code volume 19 of documents produced by Wells Fargo related to remediation and analyzing borrower impact, outline thoughts regarding facts learned from review; continue to subjectively review, analyze, and code remaining documents from volume 13 from Ms. Reimer's, Mr. Agocs', and Ms. Pemble's email files	7.4	\$425	\$ 3,145.00

2019-09-17	LPL	Review and analyze documents that have been marked hot in the case	1.6	\$465	\$ 744.00
2019-09-17	RMP	Review hot documents for trial	2	\$725	\$ 1,450.00
2019-09-17	NS	WF Document Review	2.3	\$415	\$ 954.50
2019-09-17	LCF	Review and subjectively code documents from volume 18 of documents produced by Wells Fargo related to validating whether borrowers harmed by the error, continue to outline thoughts regarding additional information learned	5.6	\$425	\$ 2,380.00
2019-09-18	LCF	Continue to assist with second level review of documents marked "hot," including begin review and analysis of "hot" documents from September 12 to-date	0.5	\$425	\$ 212.50
2019-09-18	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.5	\$230	\$ 115.00
2019-09-18	RMP	Review hot documents for trial purposes	2	\$725	\$ 1,450.00
2019-09-18	LCF	Finish review and subjective coding of documents from volume 18 of documents produced by Wells Fargo related to validating whether borrowers harmed by the error, including finish outlining thoughts regarding additional information learned; analyze overall status of document review and timing to complete, draft update to Ms. Lam regarding the same	2.7	\$425	\$ 1,147.50
2019-09-18	NS	WF Document Review	3.2	\$415	\$ 1,328.00
2019-09-19	LCF	Begin to update memorandum regarding facts learned from "hot" documents, including outlining additional facts learned regarding other errors and scope of error with respect to SLoad software	2	\$425	\$ 850.00
2019-09-19	RMP	Review and analyze hot documents	2	\$725	\$ 1,450.00
2019-09-19	NS	WF Document Review	4.5	\$415	\$ 1,867.50
2019-09-20	LCF	Review correspondence from Wells Fargo sending reproductions of Mr. Pfeil's employee reviews; forward to Ms. John to upload to Everlaw	0.1	\$425	\$ 42.50

2019-09-20	NS	WF Document Review	0.1	\$415	\$ 41.50
2019-09-20	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.7	\$230	\$ 161.00
2019-09-23	LCF	Continue to work on review and analysis of documents produced by Wells Fargo, including confirm document review almost complete with respect to documents produced to date, assign Mr. Shah remaining documents to be reviewed, update Ms. Lam regarding document review status	0.3	\$425	\$ 127.50
2019-09-23	NS	WF Document Reivew	1.1	\$415	\$ 456.50
2019-09-24	NS	WF Document Review	1.4	\$415	\$ 581.00
2019-09-24	RPN	Review hot documents for purposes of future depositions, hearings, or trials	1.5	\$230	\$ 345.00
2019-09-26	NS	WF Document Review	1	\$415	\$ 415.00
2019-10-01	NS	WF Document Review	2.3	\$415	\$ 954.50
2019-10-03	NS	WF Document Review	0.2	\$415	\$ 83.00
2019-10-04	LCF	Begin to outline thoughts regarding various "privilege" and confidentiality objections	0.3	\$425	\$ 127.50
2019-10-05	NS	WF Document Review	0.6	\$415	\$ 249.00
2019-10-07	KDJ	Review document productions and upload two replacement productions; communications with Everlaw	0.2	\$250	\$ 50.00
2019-10-07	RMP	Review hot documents	0.4	\$725	\$ 290.00
2019-10-07	LCF	Begin second level review and analysis of documents produced by Wells Fargo marked "hot" within the last month	1.1	\$425	\$ 467.50
2019-10-08	LCF	Finish second level review and analysis of documents produced by Wells Fargo and marked "hot" within the last month	1.4	\$425	\$ 595.00
2019-10-08	LCF	Continue to review and analyze documents produced by Wells Fargo and documents previously marked "hot;" review and analyze facts memorandum and case memorandum and begin to outline thoughts regarding potential additional deponents and discovery to request from Wells Fargo	1.8	\$425	\$ 765.00

2019-10-10	LCF	Continue to work on review and analysis of Wells Fargo's privilege logs and most recently received, 50 plus page log, including correspond with Ms. Lam regarding various issues and questions noted from prior review, and draft follow up correspondence outlining specific questions to potentially raise with Wells Fargo and additional questions/concerns to track down	1.3	\$425	\$ 552.50
2019-10-11	RMP	Review hot documents; create document chronology	0.9	\$725	\$ 652.50
2019-10-11	LCF	Continue to analyze potential additional deponents and discovery to request from Wells Fargo, including call with team regarding the same; review "hot" documents and outline thoughts regarding potential deponents in preparation for call and send additional information regarding potential deponents and discovery requests after call	1.6	\$425	\$ 680.00

2019-10-14	LCF	Continue to analyze additional written discovery to potentially request from Wells Fargo and potential deponents, including analyze Wells Fargo's document production to-date in light of identified custodians and time periods, confirm documents produced from each identified custodian and whether additional follow-up needed, analyze outstanding custodians to be produced, confirm all documents produced have been reviewed; analyze document production in light of prior agreements between the parties and golden rule correspondence, including outline whether additional follow-up needed for specific discovery requests; analyze questions regarding document retention and Electronically Stored Information, including outline thoughts regarding additional questions with respect to Wells Fargo's identified document retention policies and document sources	5	\$425	\$ 2,125.00
2019-10-15	LPL	Review and analyze several documents that Wells Fargo recently produced	0.1	\$465	\$ 46.50
2019-10-15	RMP	Review hot documents	0.5	\$725	\$ 362.50
2019-10-16	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.7	\$230	\$ 161.00
2019-10-16	RMP	Review hot documents	1.8	\$725	\$ 1,305.00
2019-10-17	RPN	Review hot documents for purposes of future depositions, hearings, or trials; review medical records request documents from Defendant	0.7	\$230	\$ 161.00
2019-10-18	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.2	\$230	\$ 46.00
2019-10-21	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.4	\$230	\$ 92.00

2019-10-21	LCF	Analyze Wells Fargo's production of board level documents and outline thoughts regarding follow-up of the same, including review and analyze prior, relevant requests for production of board level information, Judge Alsup's Order regarding production required, and documents produced by Wells Fargo in response to that Order	1.1	\$425	\$ 467.50
2019-10-21	RMP	Review hot documents and create chronology	2.3	\$725	\$ 1,667.50
2019-10-23	LCF	Review Wells Fargo's production of additional third party documents received in response to their subpoenas	0.1	\$425	\$ 42.50
2019-10-23	LCF	Review and analyze relevant documents regarding prior error on Veterans Administration loans and outline thoughts regarding potential deponents to testify regarding the same; circulate thoughts to the team	0.5	\$425	\$ 212.50
2019-10-23	RMP	Create chronology of hot documents	2.2	\$725	\$ 1,595.00
2019-10-24	LPL	E-mail to co-counsel L. Fellows re: whether we want to push WF on certain redactions based on bank examiner's privilege	0.2	\$465	\$ 93.00
2019-10-24	RMP	Create chronology of hot documents	1.6	\$725	\$ 1,160.00
2019-10-25	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.6	\$230	\$ 138.00
2019-10-25	LCF	Continue to review, analyze, and outline thoughts regarding documents produced by Wells Fargo, including further analysis of documents previously marked "hot" and outline thoughts regarding additional facts learned	1.6	\$425	\$ 680.00
2019-10-25	RMP	Prepare chronology of hot documents	2.4	\$725	\$ 1,740.00
2019-10-28	RPN	Review hot documents for purposes of future depositions, hearings, or trials	0.2	\$230	\$ 46.00
2019-10-28	RMP	Prepare chronology of hot documents	2.5	\$725	\$ 1,812.50
2019-10-29	KDJ	Review document load files; review Everlaw uploads	0.3	\$250	\$ 75.00

2019-10-29	LCF	Continue to outline thoughts and facts learned through documents marked "hot" and analyze next steps to find and assimilate relevant documents needed	1.2	\$425	\$ 510.00
2019-10-29	RPN	Review hot documents for purposes of future depositions, hearings, or trials	1.4	\$230	\$ 322.00
2019-10-29	MLS	Review chron list of hot documents	2	\$800	\$ 1,600.00
2019-10-29	LCF	Review and subjectively code most recent production, Volume 22, from Wells Fargo, including additional 2013 documents and additional board level documents	2.1	\$425	\$ 892.50
2019-10-30	LCF	Continue to review and outline thoughts regarding most recently produced documents, including outline chronology and thoughts regarding additional information learned from 2013 time period	1.1	\$425	\$ 467.50
2019-11-01	RMP	Review discovery information on class members; review new hot documents	0.6	\$725	\$ 435.00
2019-11-01	MLS	Review recently produced hot docs	1	\$800	\$ 800.00
2019-11-04	NS	Reviewing document productions for Pfeil and Crawford.	0.3	\$415	\$ 124.50
2019-11-08	RMP	Review hot documents	0.5	\$725	\$ 362.50
2019-11-09	RMP	Review hot documents	0.6	\$725	\$ 435.00
2019-11-11	KDJ	Upload new document production	0.3	\$250	\$ 75.00
2019-11-13	LPL	Review and analyze documents from WF's production on possible would-be terms of named plaintiffs' loan modifications	0.4	\$465	\$ 186.00
2019-11-15	NS	Document Review	0.2	\$415	\$ 83.00
2019-11-22	LCF	Review loan documents for three California borrowers produced by Wells Fargo, work with Mr. Neal regarding locating borrowers on class list, and saving documents to the file	0.2	\$425	\$ 85.00
2019-11-22	NS	Reviewing documents related to named plaintiffs loan documents and cap sheet	4.5	\$415	\$ 1,867.50
2019-11-25	KDJ	Process new Wells Fargo's document production	0.1	\$250	\$ 25.00
2019-11-25	RMP	Prepare chronology of hot documents	1.2	\$725	\$ 870.00
2019-11-25	NS	Reviewing documents (Custodian: J Liggett)	1.5	\$415	\$ 622.50

2019-11-25	LCF	Begin to review and subjectively code most recently produced documents from Wells Fargo	4	\$425	\$ 1,700.00
2019-11-27	NS	Reviewing documents re: plaintiff cap sheets.	0.6	\$415	\$ 249.00
2019-11-27	NS	Continuing document review (custodian J. Liggett)	1.1	\$415	\$ 456.50
2019-11-29	LCF	Begin to review, analyze, and subjectively code documents produced in volume 24, including additional documents regarding "fixing" the calculation error in 2013-2015, testing of the Home Preservation Application software results, and analyzing borrower harm; begin to outline facts learned	7	\$425	\$ 2,975.00
2019-12-02	NS	Reviewing Documents (custodian: J. Liggett)	0.8	\$415	\$ 332.00
2019-12-02	LCF	Continue to analyze Wells Fargo's privilege logs, including recently received 55 page log, note potential issues, and outline thoughts regarding follow-up correspondence to Wells Fargo	1.4	\$425	\$ 595.00
2019-12-02	LCF	Continue to review and analyze documents produced by Wells Fargo on November 12 and subjectively code the same	2.2	\$425	\$ 935.00
2019-12-03	LCF	Continue to analyze Wells Fargo's privilege logs, including recently received 55 page log, note potential issues, and outline thoughts regarding follow-up correspondence to Wells Fargo	5.8	\$425	\$ 2,465.00
2019-12-04	LCF	Finish initial review of Wells Fargo's privilege logs, including research prior opinions from Judge Alsup regarding privilege issues, draft proposed follow-up letter to Wells Fargo regarding privilege issues and circulate draft letter to the team	6	\$425	\$ 2,550.00

2019-12-05	LCF	Review Wells Fargo's correspondence sending production of loan files in advance of next week's California class member depositions	0.1	\$425	\$ 42.50
2019-12-05	KDJ	Upload new Wells Fargo document production	0.3	\$250	\$ 75.00
2019-12-08	KDJ	Upload new Wells Fargo document production	0.3	\$250	\$ 75.00
2019-12-09	NRL	Reviewed documents sent by Wells Fargo containing borrower loan documents	0.5	\$275	\$ 137.50
2019-12-10	NRL	Reviewed more documents related to loan documents of clients	0.4	\$275	\$ 110.00
2019-12-10	RMP	Review hot documents	3.5	\$725	\$ 2,537.50
2019-12-11	NRL	Continued reviewing documents from Monday production	0.5	\$275	\$ 137.50
2019-12-12	NS	Communicating with co-counsel (NL) re: loan history doc review	0.3	\$415	\$ 124.50
2019-12-12	NRL	Continued reviewing documents from Wells Fargo loan production; coded and reviewed documents	8.7	\$275	\$ 2,392.50
2019-12-13	NRL	Continued coding document productions concerning client loan files; prepare client documents for use in deposition preparation	8.8	\$275	\$ 2,420.00
2019-12-16	LCF	Review Wells Fargo's production of additional plaintiff cap sheets and correspond with document management vendor regarding next steps to upload the same for review	0.2	\$425	\$ 85.00
2019-12-17	KDJ	Upload new document production	0.1	\$250	\$ 25.00
2019-12-19	KDJ	Upload numerous new document productions from Wells Fargo	0.4	\$250	\$ 100.00
2019-12-19	LCF	Begin to review two large productions from Wells Fargo, including begin to analyze thoughts regarding prioritizing review and production from specific custodians	0.6	\$425	\$ 255.00
2019-12-23	KDJ	Upload three new document productions	0.1	\$250	\$ 25.00

2019-12-27	LCF	Review, analyze, and outline custodians and time periods produced from Wells Fargo's two most recent productions of more than 6,000 documents; begin to subjectively code the same	2.5	\$425	\$ 1,062.50
2019-12-30	NS	Document Review (Custodian J Liggett)	1.1	\$415	\$ 456.50
2020-01-02	LCF	Continue to review Wells Fargo's most recently produced documents, including outline and analyze potential priority of review and dividing up review of documents, as well as continue to review and subjectively code documents	0.8	\$425	\$ 340.00
2020-01-06	RMP	Review hot documents; prepare for depositions	2	\$725	\$ 1,450.00
2020-01-10	LCF	Review correspondence from Wells Fargo producing additional documents	0.1	\$425	\$ 42.50
2020-01-10	RMP	Review hot documents; prepare for depositions	2.1	\$725	\$ 1,522.50
2020-01-13	NS	Document Review (J. Liggett)	0.5	\$415	\$ 207.50
2020-01-21	RPN	Review and organize documents identified to be possible deposition or trial exhibits	3.2	\$230	\$ 736.00
2020-01-22	RPN	Review and organize documents identified to be possible deposition or trial exhibits	7.1	\$230	\$ 1,633.00
2020-01-24	RPN	Review and organize documents identified to be possible deposition or trial exhibits	0.2	\$230	\$ 46.00
2020-01-24	LCF	Continue to assist with review of additional "hot" documents, including work to locate relevant information in large spreadsheets for review, analyze spreadsheets and whether truly 'hot' documents	3	\$425	\$ 1,275.00
2020-01-27	LCF	Continue to subjectively code documents, including personnel files and additional remediation documents from 2013-2015	2.1	\$425	\$ 892.50

2020-01-28	LCF	Continue to review and subjectively code documents produced by Wells Fargo, including documents related to remediations generally in 2015 and outline thoughts regarding facts learned	2.8	\$425	\$ 1,190.00
2020-01-29	LCF	Continue to review and subjectively code documents produced by Wells Fargo, including documents regarding general remediation efforts in 2014/2015; update chart tracking status of document review and outline documents remaining to be reviewed and discuss next steps to finish review with team	2	\$425	\$ 850.00
2020-01-29	RPN	Review and organize documents identified to be possible deposition or trial exhibits	3.8	\$230	\$ 874.00
2020-01-30	NS	Doc Review (Custodian: J. Ligget and Arthur Scholten)	2.4	\$415	\$ 996.00
2020-01-30	LCF	Continue to review documents produced by Wells Fargo and subjectively code the same, as well as analyze division of documents remaining to be coded and assign document groups for review to Ms. Lam, Mr. Bloomfield, and Mr. Shah, and draft and send instructions outlining documents just assigned	2.6	\$425	\$ 1,105.00
2020-01-30	NS	Doc Review (Custodian J. Liggett)	2.7	\$415	\$ 1,120.50
2020-01-31	LCF	Continue to review and subjectively code documents produced by Wells Fargo on the close of discovery (and after that time), including documents regarding remediations in 2015 and similar calculation errors	1	\$425	\$ 425.00
2020-02-01	LCF	Continue to review and subjectively code documents produced by Wells Fargo on the close of discovery (and after that time), including documents regarding remediations in 2015 and similar calculation errors	2	\$425	\$ 850.00
2020-02-01	NS	Document Review (Custodian: A. Scholten)	4.4	\$415	\$ 1,826.00
2020-02-02	NS	Document Review	6.1	\$415	\$ 2,531.50

2020-02-03	RPN	Review and organize documents identified to be possible deposition or trial exhibits	0.2	\$230	\$ 46.00
2020-02-03	LCF	Continue to work on subjective review of Wells Fargo's documents produced, including analyze review of documents related to testing of Wells Fargo's software, create additional "codes" regarding testing, and draft update to Mr. Shah, Mr. Bloomfield, and Ms. Lam regarding new testing codes and documents regarding testing	0.4	\$425	\$ 170.00
2020-02-03	LPL	Review Wells Fargo's latest document production	1.6	\$465	\$ 744.00
2020-02-03	JJB	Review documents recently produced by Wells Fargo	2.1	\$580	\$ 1,218.00
2020-02-04	JJB	Review documents recently produced by Wells Fargo	2.4	\$580	\$ 1,392.00
2020-02-05	JJB	Review documents recently produced by Wells Fargo	1.5	\$580	\$ 870.00
2020-02-05	LCF	Continue to review and subjectively code documents produced by Wells Fargo, including documents related to remediations in 2015	1.5	\$425	\$ 637.50
2020-02-06	JJB	Review documents recently produced by Wells Fargo	1.7	\$580	\$ 986.00
2020-02-06	LCF	Continue to review and subjectively code additional documents produced by Wells Fargo	2.8	\$425	\$ 1,190.00
2020-02-08	LCF	Continue to review and subjectively code documents produced by Wells Fargo, including documents related to software testing and general remediation documents	4.1	\$425	\$ 1,742.50
2020-02-09	LCF	Continue to review and subjectively code documents produced by Wells Fargo, including documents related to general remediation of Customer Impact Tracking 6214 as well as remediations in 2014	4.5	\$425	\$ 1,912.50

2020-02-10	LCF	Finish initially reviewing and subjectively code documents produced by Wells Fargo, including send final set of Net Present Value testing documents to Mr. Shah for further analysis and confirm remaining documents have all been reviewed and coded	1.7	\$425	\$ 722.50
2020-02-10	NS	Document Review (NPV Testing)	5.2	\$415	\$ 2,158.00
2020-02-11	NS	Drafting summary of document review	0.5	\$415	\$ 207.50
2020-02-12	LCF	Continue to review final set of documents produced by Wells Fargo, including conduct second level review of approximately 250 additional "hot" documents to confirm actually "hot"	1.6	\$425	\$ 680.00
2020-02-13	LCF	Continue to work on review and analysis of final documents produced by Wells Fargo, including review documents no longer marked "hot," prepare final set of "hot" documents, including analyze specific questions regarding how (and what portions) of documents need to be printed	2.1	\$425	\$ 892.50
2020-02-15	RPN	Review and organize documents identified to be possible deposition or trial exhibits	4.8	\$230	\$ 1,104.00
2020-02-17	JJB	Review and analyze recently produced documents	2.8	\$580	\$ 1,624.00
2020-02-18	JJB	Review and analyze recently produced documents	2.1	\$580	\$ 1,218.00
2020-02-20	LCF	Review correspondence from Wells Fargo with clawback letter, draft and send request for copy of clawback letter with documents in bates number order for easier review, review response with revised letter	0.1	\$425	\$ 42.50
2020-02-21	LCF	Analyze Wells Fargo's additional clawback letter, including compare the same to documents previously marked "hot" and outline whether need to challenge any of the requested clawback documents	0.6	\$425	\$ 255.00

2020-02-27	LCF	Continue to review and analyze documents marked "hot," including review documents de-designated as hot	1.5	\$425	\$ 637.50
2020-03-03	LCF	Receive call from Ms. Scavo regarding delay in Wells Fargo's production of additional Class member information; including draft summary of call and circulate to the team and analyze impact of delay on other outstanding discovery and general next steps in light of same	0.4	\$425	\$ 170.00
2020-03-03	RPN	Review and organize documents identified to be possible settlement conference, or trial exhibits	6.2	\$230	\$ 1,426.00
		Project Total:	777.4		\$ 300,360.50
Project: Opp. to motion to dismiss first amended complaint					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-03-15	LPL	E-mails with defense counsel re: filing stipulation to extend deadlines for motion to dismiss briefing	0.1	\$465	\$ 46.50
2019-03-18	RMP	Analyze legal claims; prepare for motion to dismiss	1.6	\$725	\$ 1,160.00
2019-03-29	MLS	Email G. Munroe re MTD	0.2	\$800	\$ 160.00
2019-03-29	LPL	Review and analyze Wells Fargo's motion to dismiss Plaintiffs' first amended complaint	0.6	\$465	\$ 279.00
2019-03-29	RMP	Review and analyze motion to dismiss, motion to take judicial notice, and proposed order	0.7	\$725	\$ 507.50
2019-03-29	GAM	Review Wells Fargo's MTD, preliminary outline of points to respond to and initial arguments, some factual research, and email with MLS re response	3.3	\$720	\$ 2,376.00
2019-04-01	MLS	Review WF MTD; draft agenda re team conf. call	2	\$800	\$ 1,600.00
2019-04-02	LCF	Begin to outline and analyze next steps to response to Wells Fargo's Amended Motion to Dismiss including research for the same, as well as potential settlement discussions	0.2	\$425	\$ 85.00
2019-04-02	GAM	Call to discuss MTD and other issues	0.5	\$720	\$ 360.00

2019-04-02	LPL	Conf. call with team re: plan for motion to dismiss briefing, discovery	0.7	\$465	\$ 325.50
2019-04-02	MLS	Conf. call Team re MTD opp research needs; discovery plan; review MTD	1	\$800	\$ 800.00
2019-04-02	GAM	Identify discrete areas for research by others, email with detailed description to MLS for discussion and circulation to team members	1.4	\$720	\$ 1,008.00
2019-04-02	GAM	Research and analysis re opposing WF's motion to dismiss	2.8	\$720	\$ 2,016.00
2019-04-03	LPL	Call and e-mail with G. Munroe re: research assignments for Plaintiffs' opposition to WF's motion to dismiss	0.1	\$465	\$ 46.50
2019-04-03	MLS	Review G. Munroe email re research projects for MTD; tel. call re same; email re assignments;	1	\$800	\$ 800.00
2019-04-03	GAM	Research for opposition to MTD	7.6	\$720	\$ 5,472.00
2019-04-04	LPL	E-mails with M. Schrag and J. Bloomfield re: research assignments for opposition to WF's motion to dismiss	0.2	\$465	\$ 93.00
2019-04-05	RMP	Work on opposition to motion to dismiss	1.5	\$725	\$ 1,087.50
2019-04-05	GAM	Continue research and outlining for Opp to MTD	7.7	\$720	\$ 5,544.00
2019-04-08	LCF	Analyze research project regarding amended motion to dismiss and Home Affordable Modification Program standards	0.1	\$425	\$ 42.50
2019-04-08	JJB	Research re HAMP guidelines in connection with negligence claims	2.4	\$580	\$ 1,392.00
2019-04-08	GAM	Work on Opp to MTD, focusing on summary of allegations	4.1	\$720	\$ 2,952.00
2019-04-09	LPL	Legal research re: standard for defendants' knowledge in IIED cases brought by non-borrowers	0.4	\$465	\$ 186.00

2019-04-09	LCF	Research relevant regulations and state statutes/case law regarding requirement(s) to provide notice/cure prior to acceleration and/or foreclosure per Home Affordable Modification Program, as well as Maryland and Ohio, review and analyze contracts provided for named plaintiffs Demartino and Hood; outline thoughts regarding the same and circulate to team	2.9	\$425	\$ 1,232.50
2019-04-09	JJB	Research re HAMP guidelines in connection with negligence claims	3.8	\$580	\$ 2,204.00
2019-04-09	GAM	Continue drafting Opp to MTD: complete summary of allegations, begin drafting standing sections	7.6	\$720	\$ 5,472.00
2019-04-10	LPL	Legal research re: non-borrower plaintiffs' IIED claims	0.4	\$465	\$ 186.00
2019-04-10	GAM	Continue drafting MTD Opp: resume work on HAMP pre-emption portion of standing argument; review research on Demartino contract section, follow-up research and email with L. Fellows re same	4.6	\$720	\$ 3,312.00
2019-04-11	LCF	Continue to work on research of relevant Housing and Urban Development regulations regarding notice to cure/default required by lender, review feedback from Mr. Munroe regarding initial research, conduct additional research and send to Mr. Munroe	0.4	\$425	\$ 170.00
2019-04-11	JJB	Further research re HAMP guidelines in connection with negligence claims	2.5	\$580	\$ 1,450.00
2019-04-11	LPL	Legal research re: non-borrower plaintiffs' IIED claims for motion to dismiss briefing	2.6	\$465	\$ 1,209.00
2019-04-12	LPL	Legal research re: whether contract and IIED claims survive death under Ohio state law; e-mail to M. Schrag and J. Bloomfield re: same	1.2	\$465	\$ 558.00

2019-04-12	GAM	Work on contract section of Opp to MTD: Review contract research from co-counsel, additional research to support interpretation of cure and general contract interpretation authority	4.4	\$720	\$ 3,168.00
2019-04-13	GAM	Work on Opp to MTD: Draft contract section of MTD Opp; research HUD regs and write Demartino contract section; preliminary work on IIED section	3.8	\$720	\$ 2,736.00
2019-04-14	GAM	Research and draft IIED section of Opp to MTD	4.8	\$720	\$ 3,456.00
2019-04-15	MLS	Review research memos on mtd; conf. G. Munroe re MTD	1.3	\$800	\$ 1,040.00
2019-04-15	LPL	Legal research on non-borrower plaintiffs' IIED claims for MTD opp.	3.3	\$465	\$ 1,534.50
2019-04-15	GAM	Continue drafting Opp to MTD, focusing on UCL sections on unlawful and unfair; discuss status with MLS and assign discrete sections	7.7	\$720	\$ 5,544.00
2019-04-16	LPL	Confer with M. Schrag re: briefing for MTD opp. and discovery tasks in the case	0.2	\$465	\$ 93.00
2019-04-16	MLS	Tel. call G. Munroe re MTD opp.; draft agenda for conf. call	0.7	\$800	\$ 560.00
2019-04-16	LPL	Legal research on non-borrower Plaintiffs' IIED claims; begin drafting MTD opp. section on the same	4.7	\$465	\$ 2,185.50
2019-04-16	GAM	Continue drafting UCL unfair section, outline and begin drafting sections on other states' UDAP	5.6	\$720	\$ 4,032.00
2019-04-17	LPL	Conf. call with co-counsel re: update on MTD opp. briefing, discovery, and other outstanding tasks/issues	0.5	\$465	\$ 232.50
2019-04-17	MLS	Team conf. call re discovery, MTD; tel. call A. Sheanin re CPI settlement and parallels to loan mod	1	\$800	\$ 800.00
2019-04-17	GAM	Team call re MTD briefing status, discovery topics, damages, and other agenda items	1	\$720	\$ 720.00
2019-04-17	LPL	Draft section on non-borrower Plaintiffs' IIED claims; e-mail to G. Munroe re: same	4.1	\$465	\$ 1,906.50

2019-04-19	JJJ	Research re negligence per se claims in connection with opposition to motion to dismiss	2.6	\$580	\$ 1,508.00
2019-04-20	JJJ	Prepare and circulate email memo re negligence per se claims in connection with opposition to motion to dismiss	1.1	\$580	\$ 638.00
2019-04-20	JJJ	Finalize research re negligence per se claims in connection with opposition to motion to dismiss	2.3	\$580	\$ 1,334.00
2019-04-20	GAM	Continue drafting other state UDAP sections; research and draft negligence section	10.1	\$720	\$ 7,272.00
2019-04-21	GAM	Continue work on Opp to MTD: research re possible negligence per se argument, research and draft economic loss rule section	2.3	\$720	\$ 1,656.00
2019-04-22	RMP	Analyze issues regarding motion to dismiss; work on opposition to motion to dismiss; correspondence with opposing counsel regarding meet-and-confer on deficient discovery responses	1.4	\$725	\$ 1,015.00
2019-04-22	GAM	Continue work on MTD Opp: review LL research and draft section on non-borrowers, research further and revise; research and revise draft HBOR section from co-counsel; full revision of brief body; outline and begin drafting intro	9.7	\$720	\$ 6,984.00
2019-04-23	LCF	Continue to work on Opposition to Wells Fargo's Motion to Dismiss First Amended Complaint, including begin to review draft Opposition from Mr. Munroe and outline thoughts regarding the same	0.6	\$425	\$ 255.00
2019-04-23	GAM	Run edit of brief and add cites	2.5	\$720	\$ 1,800.00
2019-04-23	GAM	Complete introduction of MTD Opp, revise and circulate draft for review	2.6	\$720	\$ 1,872.00
2019-04-23	MLS	Work on opp. to MTD	3.7	\$800	\$ 2,960.00
2019-04-24	JJJ	Calls with co-counsel and M. Schrag and G. Munroe re draft opposition to motion to dismiss	0.8	\$580	\$ 464.00
2019-04-24	JJJ	Review and analyze draft opposition to motion to dismiss	1.4	\$580	\$ 812.00

2019-04-24	LPL	Review and analyze draft of Plaintiffs' opposition to WF's motion to dismiss; confer with M. Schrag re: same	1.4	\$465	\$ 651.00
2019-04-24	MLS	Work on opp. to MTD; tel. calls R. Paul and G. Munroe re same; conf. L. Lam and J. Bloomfield re same	3.5	\$800	\$ 2,800.00
2019-04-24	RMP	Draft opposition to motion to dismiss	5.4	\$725	\$ 3,915.00
2019-04-24	GAM	Review R. Paul and MLS redlines of MTD Opp, discuss with MLS, revise brief	5.8	\$720	\$ 4,176.00
2019-04-24	LCF	Continue to work on Opposition to Wells Fargo's Motion to Dismiss First Amended Complaint, including finish review of draft Opposition from Mr. Munroe and outline thoughts regarding the same, research and analyze relevant case law including Wigood and cases following Wigood to potentially incorporate into draft, analyze edits/changes with Mr. Paul, draft proposed edits to the Opposition	6.5	\$425	\$ 2,762.50
2019-04-25	JJB	Emails with G. Munroe re opposition to motion to dismiss	0.4	\$580	\$ 232.00
2019-04-25	RMP	Draft opposition to motion to dismiss	1.7	\$725	\$ 1,232.50
2019-04-25	JJB	Final proofread and edit of opposition to motion to dismiss	2.7	\$580	\$ 1,566.00
2019-04-25	LPL	Edit, finalize, and file Plaintiffs' opposition to WF's motion to dismiss the first amended complaint	3.9	\$465	\$ 1,813.50
2019-04-25	MLS	Work on opp. to MTD	6.5	\$800	\$ 5,200.00
2019-04-25	GAM	Finalize Opp to MTD for filing: further revise brief, review and address redlines from various readers, discuss with MLS	6.8	\$720	\$ 4,896.00
2019-05-10	GAM	Review WF's reply brief iso MTD, research cited cases and identify points for argument	0.6	\$720	\$ 432.00
2019-05-11	RMP	Review and analyze reply in support of motion to dismiss	0.5	\$725	\$ 362.50
2019-05-19	GAM	Review MTD briefing, call with MLS to prepare for argument, focusing on contract	1.1	\$720	\$ 792.00
2019-05-19	MLS	Prep for MTD hearing; tel. call G. Munroe re same	2	\$800	\$ 1,600.00

2019-05-20	LPL	Draft summary on certain named plaintiffs' facts and state law consumer claims to send to M. Schrag to help him prepare for upcoming MTD hearing	0.5	\$465	\$ 232.50
2019-05-20	LCF	Assist with preparations for hearing on Wells Fargo Bank, North America.'s Motion to Dismiss, including draft summary of prima facie case for any state law claims, facts alleged for the same, and any other relevant facts for Mr. and Mrs. Floyd, Mr. and Mrs. Simoneaux, Ms. Wilson, and Mr. Frye, including research relevant case law regarding prima facie evidence needed, send summary to Mr. Schrag	2.1	\$425	\$ 892.50
2019-05-20	MLS	Conf. call Team re motions to dismiss and discovery issues; legal research and prep for MTD hearing.	5	\$800	\$ 4,000.00
2019-05-21	LPL	Prepare to argue state consumer protection claims at hearing on Wells Fargo Bank's motion to dismiss	4.2	\$465	\$ 1,953.00
2019-05-21	MLS	Prep for MTD hearing; tel calls G. Munroe re same; emails and calls re stipulation for extension on WFC MTD	8.5	\$800	\$ 6,800.00
2019-05-22	LPL	Calls with G. Munroe to discuss potential issues at oral argument on Wells Fargo Bank's motion to dismiss	0.9	\$465	\$ 418.50
2019-05-22	RMP	Prepare for hearing on motion to dismiss	6.7	\$725	\$ 4,857.50
2019-05-22	MLS	Prep for MTD hearing	7	\$800	\$ 5,600.00
2019-05-22	LPL	Review briefing and cases to prepare for oral argument on Wells Fargo Bank's motion to dismiss	8.8	\$465	\$ 4,092.00
2019-05-23	LPL	Hearing on Wells Fargo Bank's motion to dismiss; travel to and from SF to courthouse	2	\$465	\$ 930.00
2019-05-23	LPL	Continue preparing for hearing on Wells Fargo Bank's motion to dismiss by reviewing briefing and cases	4.9	\$465	\$ 2,278.50
2019-05-23	MLS	Prep for hearing on MTD; Hearing on MTD;	6	\$800	\$ 4,800.00

2019-05-23	RMP	Prepare for and attend motion to dismiss hearing; meeting with opposing counsel to discuss settlement of named Plaintiffs' claims; return travel to Kansas City	10	\$725	\$ 7,250.00
2019-06-04	MLS	Review Order on MTD and discuss with L. Lam	0.5	\$800	\$ 400.00
2019-06-04	LPL	Review and analyze order on WF Bank's motion to dismiss; confer with M. Schrag re: same	0.7	\$465	\$ 325.50
2019-07-03	RMP	Hearing on motion to dismiss Wells Fargo Complaint; return travel to Kansas City	7.1	\$725	\$ 5,147.50
		Project Total:	274.1		\$ 183,119.00
Project: Rule 30(b)(6) deposition notice					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-01-14	RMP	Draft corporate representative deposition notice	0.5	\$725	\$ 362.50
2019-04-08	JJB	Review draft 30(b)(6) deposition topics and consider additional ones	0.8	\$580	\$ 464.00
2019-04-08	RMP	Draft topics for corporate representative deposition notice; review court rules and orders regarding depositions; review correspondence from class member	1.5	\$725	\$ 1,087.50
2019-04-16	MLS	Review/edit 30b6 depo topics	0.3	\$800	\$ 240.00
2019-04-17	LCF	Correspond with team regarding multiple case management issues and next steps, including review drafts of 30(b)(6) notice and protective order in preparation for the same, outline next steps and case assignments after call	0.8	\$425	\$ 340.00
2019-04-19	LCF	Assist with edits/revisions to draft 30(b)(6) notice to Wells Fargo Bank, outline and analyze edits with Mr. Paul, revise language to reflect Wells Fargo's public filings	0.7	\$425	\$ 297.50
2019-04-19	MLS	Review 30b6 depo topics and revised protective order	0.7	\$800	\$ 560.00
2019-04-19	RMP	Draft Rule 30(b)(6) notice with list of topics; research potential topics	1.5	\$725	\$ 1,087.50

2019-04-22	LPL	Review and edit draft 30(b)(6) deposition notice; e-mail to M. Schrag re: same	0.4	\$465	\$ 186.00
2019-04-29	LPL	E-mails with M. Schrag and G. Munroe re: draft 30(b)(6) deposition notice to Wells Fargo Bank	0.4	\$465	\$ 186.00
2019-04-29	RMP	Work on Rule 30(b)(6) notice	0.5	\$725	\$ 362.50
2019-04-29	MLS	Review/edit 30b6 topics ; tel. call and email G. Munroe re same;	0.8	\$800	\$ 640.00
2019-04-29	GAM	Review draft 30b6 topics, email and call with MLS re same; review updated topics and prepare list of areas for questioning	1.4	\$720	\$ 1,008.00
2019-04-30	MLS	Work on 30b6 topics; review notes from G. Munroe conf. L. Lam re same	1	\$800	\$ 800.00
2019-04-30	LPL	Edits to 30(b)(6) topics to Wells Fargo Bank; confer with M. Schrag re: same	1.4	\$465	\$ 651.00
2019-05-01	MLS	Work on 30b6 notice	0.3	\$800	\$ 240.00
2019-05-02	LCF	Continue to work on 30(b)(6) deposition notice to Wells Fargo, including review, analyze, and outline thoughts regarding Mr. Schrag's proposed edits; forward thoughts to Mr. Paul and analyze proposed edits with him	1.1	\$425	\$ 467.50
2019-05-03	MLS	Revise 30b6 notice	0.2	\$800	\$ 160.00
2019-05-03	RMP	Draft Rule 30(b)(6) notice; analyze discovery needs	0.7	\$725	\$ 507.50
2019-05-08	LPL	Review and edit draft 30(b)(6) deposition notice to Wells Fargo Bank	0.4	\$465	\$ 186.00
2019-05-09	LPL	Finalize and serve Rule 30(b)(6) notice to Wells Fargo Bank; call to defense counsel re: same	0.6	\$465	\$ 279.00
2019-05-29	RMP	Work on schedule and process for deposition preparation; review and analyze objections to 30(b)(6) depositions; review correspondence regarding mediators	0.7	\$725	\$ 507.50
2019-06-03	LPL	Review and analyze WF Bank's objections to 30(b)(6) notice, as well as co-counsel's proposed responses to those objections	0.4	\$465	\$ 186.00

2019-06-03	RMP	Prepare for depositions of plaintiffs; work on response to objections to Rule 30(b)(6) topics	2.1	\$725	\$ 1,522.50
2019-06-04	LPL	E-mail to team with draft clarifications/follow-up on Plaintiffs' 30(b)(6) topics to WF Bank	0.5	\$465	\$ 232.50
2019-06-04	LPL	Meet and confer telephone call with defense counsel and co-counsel R. Paul re: WF Bank's objections to Plaintiffs' Rule 30(b)(6) notice	0.8	\$465	\$ 372.00
2019-06-04	RMP	Meet-and-confer regarding 30(b)(6) topics	0.8	\$725	\$ 580.00
2019-06-11	LPL	E-mail to defense counsel re: meeting and conferring on Plaintiffs' 30(b)(6) topics to WF Bank	0.3	\$465	\$ 139.50
2019-06-20	MLS	Review emails re 30b6 status	0.2	\$800	\$ 160.00
2019-06-20	LPL	E-mails with defense counsel re: meeting and conferring on discovery disputes regarding privilege issues and 30(b)(6) topics	0.3	\$465	\$ 139.50
2019-06-28	RMP	Review discovery letter briefs to prepare for discovery conference with opposing counsel	0.4	\$725	\$ 290.00
2019-06-30	RMP	Prepare for depositions and discovery conference with opposing counsel	0.3	\$725	\$ 217.50
2019-07-01	LPL	E-mails with defense counsel and co-counsel re: sending documents that the 30(b)(6) witness used to prep (as well as documents Plaintiffs would like the 30(b)(6) witness to explain) prior to those depositions	0.3	\$465	\$ 139.50
2019-07-01	RMP	Meet-and-confer on discovery disputes regarding 30b6 notice	1.5	\$725	\$ 1,087.50
2019-07-19	LPL	Prepare and serve amended 30(b)(6) deposition notice	0.4	\$465	\$ 186.00
2019-07-19	MLS	Review revised 30b6 notice; tel. call R. Paul re same	0.5	\$800	\$ 400.00
2019-07-22	LPL	E-mails with team re: amended 30(b)(6) notice and supplementing initial disclosures with damages computations	0.6	\$465	\$ 279.00
2019-07-22	MLS	Review correspondence re discovery and 30b6 topics; email A Groves re same;	0.7	\$800	\$ 560.00

2019-07-23	LCF	Review letter from Wells Fargo in response to "amended" 30(b)(6) notice	0.1	\$425	\$ 42.50
2019-07-23	LPL	Prepare second amended 30(b)(6) notice	0.7	\$465	\$ 325.50
		Project Total:	27.6		\$ 17,479.50
Project: Communicate with class members and named Plaintiffs					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-12-14	AB	Speak with Plaintiff Alicia Hernandez concerning the status of her case.	0.4	\$430	\$ 172.00
2019-01-16	AB	Correspond with class member concerning the status of the litigation.	0.3	\$430	\$ 129.00
2019-01-18	AB	Correspond with client concerning the status of the class action litigation.	0.6	\$430	\$ 258.00
2019-01-21	LPL	Call with class member Debora Granja on status of case	0.4	\$465	\$ 186.00
2019-02-06	MLS	Draft client status update	0.7	\$800	\$ 560.00
2019-02-20	AB	Speak with named plaintiff concerning litigation status.	0.3	\$430	\$ 129.00
2019-02-21	AB	Speak with named plaintiff concerning status of her case.	0.2	\$430	\$ 86.00
2019-03-01	AGS	Respond to multiple inquiries from clients/class members regarding case status	0.2	\$575	\$ 115.00
2019-03-07	LPL	Review N.D. Cal. ADR certification requirements; work with J. Bloomfield and class member Alicia Hernandez on signing the certification to file	0.9	\$465	\$ 418.50
2019-03-13	LPL	Call with class representative Emma White re: N.D. Cal's ADR handbook and settlement options for this case	0.3	\$465	\$ 139.50
2019-03-13	LPL	Call with class member Charlene Harris re: background on the case and her facts	1.2	\$465	\$ 558.00
2019-03-14	LPL	Calls back to several class members regarding searching for documents, status update on the case, and ADR certification	0.9	\$465	\$ 418.50
2019-03-18	LPL	Call to class rep Debora Granja re: N.D. Cal.'s ADR handbook and procedures	0.3	\$465	\$ 139.50
2019-03-20	LCF	Correspond with putative class members regarding facts of potential claims and next steps	2.4	\$425	\$ 1,020.00

2019-04-01	LCF	Review voicemail from Ms. Simoneaux requesting update, correspond with her regarding the same	0.1	\$425	\$ 42.50
2019-04-02	LPL	Calls with class members Lisa Rodriguez and Steve Schmeltzer re: background on the class action and their facts	0.7	\$465	\$ 325.50
2019-04-08	LPL	Call with class member Mark Gomez re: update on the case and our receipt of his relevant documents	0.2	\$465	\$ 93.00
2019-04-24	LCF	Review correspondence from Mr. Peterson requesting case update, draft response to the same	0.1	\$425	\$ 42.50
2019-04-24	LCF	Review correspondence from Mr. Floyd regarding damages suffered, draft response to the same	0.1	\$425	\$ 42.50
2019-04-29	LPL	Call with M. Schrag and class rep Alicia Hernandez to answer questions she had about the class action process, and to give her an update on the case	0.4	\$465	\$ 186.00
2019-04-29	MLS	Conf. A. Blumenthal re settlement posture; tel. call with class rep A. Hernandez re case update; conf. L. Lam re e-mail blast to clients	1	\$800	\$ 800.00
2019-04-30	LPL	E-mail to named plaintiff Alicia Hernandez re: our opposition to Wells Fargo's motion to dismiss, and follow up to our call with her yesterday	0.2	\$465	\$ 93.00
2019-05-07	MLS	Review communications to clients, emails re same	0.2	\$800	\$ 160.00
2019-05-07	GAM	Review draft client/class member mass communication re amended complaint and revise	0.4	\$720	\$ 288.00
2019-05-07	JJB	Draft and revise email updates to clients/class members	0.8	\$580	\$ 464.00
2019-05-08	MLS	Review and edit e-mail update to clients/class members	0.3	\$800	\$ 240.00
2019-05-17	LCF	Receive call from Ms. Gladman regarding status of matter, update her regarding the same	0.2	\$425	\$ 85.00
2019-05-21	LPL	Call with class member Deborah Colon to update her on the status of the case	0.2	\$465	\$ 93.00

2019-05-28	LCF	Receive update regarding correspondence from Ms. Simoneaux and follow-up with her regarding case status	0.1	\$425	\$	42.50
2019-05-28	LCF	Begin to review draft client/class member update from Mr. Paul and Mr. Schrag	0.1	\$425	\$	42.50
2019-05-28	AGS	Draft update to clients regarding Motion to Dismiss hearing and upcoming discovery efforts	0.3	\$575	\$	172.50
2019-05-29	LCF	Finish review of draft update to clients regarding hearing on motion to dismiss and next steps, draft response to confirm no edits to same	0.1	\$425	\$	42.50
2019-05-30	LPL	E-mails and calls with certain clients/class members who had follow-up questions in response to our e-mail blast update on the case	0.5	\$465	\$	232.50
2019-06-07	LPL	Call with class member Tambra Hill to tell her about the case	0.9	\$465	\$	418.50
2019-06-13	JJB	Calls to class members re: background on case and case status	2.8	\$580	\$	1,624.00
2019-06-17	LCF	Review notes from prior attempts to reach and conversations with class members and begin to make follow-up calls to the same to update on litigation and discuss potential next steps	1	\$425	\$	425.00
2019-06-19	LPL	E-mail to class member Colleen Marchese to give her an update on current case happenings	0.2	\$465	\$	93.00
2019-06-20	LCF	Review correspondence from Mr. Hanna regarding status of matter, draft response to the same	0.1	\$425	\$	42.50
2019-06-20	LPL	E-mails with client/class member Jennifer Bossert to give her an update on the case	0.1	\$465	\$	46.50
2019-06-26	LPL	Call with class member Katrina Jefferson to talk to her about the case and her facts	0.6	\$465	\$	279.00
2019-06-27	LPL	Call and e-mails with class member Joomi Lim to tell her about the litigation and her options with respect to mediation	0.7	\$465	\$	325.50

2019-07-01	LPL	E-mail to named plaintiff Diana Trevino with an update on current events in the case	0.2	\$465	\$ 93.00
2019-07-09	LPL	E-mail to named plaintiff Deb Granja to give her an update on the litigation	0.2	\$465	\$ 93.00
2019-07-22	LPL	E-mails with J. Bloomfield re: responding to class member inquiry (Robert Bettancourt)	0.2	\$465	\$ 93.00
2019-08-15	LPL	Call with class rep Alicia Hernandez to update her on the case and talk to her about the medical records releases that Wells Fargo is seeking	0.7	\$465	\$ 325.50
2019-09-03	LPL	Call with class member Darin Windsor to update him on the status of the case	0.2	\$465	\$ 93.00
2019-09-03	LPL	E-mail to class member Pam Gassaway to update her on the case	0.2	\$465	\$ 93.00
2019-09-11	LPL	E-mails with team re: getting an update out to clients/class member on the latest happenings in the case	0.2	\$465	\$ 93.00
2019-09-12	LPL	Edits to draft update blast to clients/class members	0.3	\$465	\$ 139.50
2019-09-12	LPL	Calls and e-mails to class members/clients to update them on the status of the litigation	0.7	\$465	\$ 325.50
2019-09-16	LPL	E-mails with team re: draft update e-mail blast to clients/class members	0.3	\$465	\$ 139.50
2019-09-16	LPL	Calls and e-mails with clients/class members to update them on the status of the case	0.9	\$465	\$ 418.50
2019-09-17	LCF	Review and respond to Mr. Floyd regarding status of matter and other general, questions	0.1	\$425	\$ 42.50
2019-09-18	LCF	Review and respond to inquiry from Ms. Floyd regarding status and next steps	0.1	\$425	\$ 42.50
2019-10-08	LPL	E-mails with co-counsel L. Fellows re: responding to certain class member inquiries	0.2	\$465	\$ 93.00
2019-10-08	LPL	Calls with class representatives Debora Granja and Alicia Hernandez re: case status and the upcoming settlement conference	0.7	\$465	\$ 325.50

2019-10-09	LPL	E-mails with team re: responding to client/class member inquiries on the status of the litigation, and sending out update blasts to clients	0.3	\$465	\$ 139.50
2019-10-09	LPL	E-mails with clients and class members re: status of the litigation	0.4	\$465	\$ 186.00
2019-10-10	LPL	E-mails with co-counsel re: responding to recent class member inquiries	0.3	\$465	\$ 139.50
2019-10-11	LPL	Call to class representative Diana Trevino to discuss case status and upcoming settlement conference; e-mail to team re: same	0.4	\$465	\$ 186.00
2019-10-11	LPL	Edit and finalize letter to defense counsel re: continued communications with class members regarding case status	0.6	\$465	\$ 279.00
2019-10-18	JJB	Work on draft email update blasts to clients and class members	0.6	\$580	\$ 348.00
2019-10-21	LPL	E-mails with class member Patrice Hill to update her on the status of the case	0.2	\$465	\$ 93.00
2019-10-22	LPL	Call with class member Brent Zollman re: update on the case and next steps	0.3	\$465	\$ 139.50
2019-10-25	JJB	Work on client and class member updates	0.8	\$580	\$ 464.00
2019-10-28	LPL	Edits to draft update blast to clients/class members on litigation happenings	0.3	\$465	\$ 139.50
2019-10-29	LPL	E-mails with team re: draft e-mail blast to send to clients/class members on the status of the case	0.3	\$465	\$ 139.50
2019-11-04	LPL	E-mails with class members Alicia Hernandez and Colleen Marchese to update them on the status of the case	0.4	\$465	\$ 186.00
2019-11-07	LPL	E-mails to class reps Debora Granja and Diana Trevino re: the scheduling conference that was previously set for December	0.2	\$465	\$ 93.00
2019-11-25	LPL	E-mails with class member Colleen Marchese re: update on the case and the new \$15,000 check she received from Wells Fargo	0.3	\$465	\$ 139.50

2019-11-25	NS	Call with class member re: case background, being an absent class member, statute of limitations (tolling), mediation, and the claims we are pursuing on behalf of the class.	0.8	\$415	\$ 332.00
2019-11-26	LPL	E-mails with class member Joomi Lim re: how a class action works and update on the case	0.2	\$465	\$ 93.00
2019-11-27	LPL	Call with class member Jennifer Fouchie to explain the case background and status	1.1	\$465	\$ 511.50
2019-12-05	LCF	Review and respond to correspondence from Mr. Floyd; review correspondence from Ms. Simoneaux and send case update in response	0.2	\$425	\$ 85.00
2019-12-09	LPL	E-mail to class member Joanna Corliss re: update on the current happenings in the case	0.2	\$465	\$ 93.00
2019-12-11	LPL	E-mails with class member Corinthia Shields re: update on status of litigation	0.2	\$465	\$ 93.00
2019-12-22	LCF	Review email from class member, George Brown, and draft response to the same	0.1	\$425	\$ 42.50
2019-12-27	LCF	Call with class member and client, George Brown, regarding case status and next steps	0.2	\$425	\$ 85.00
2019-12-30	JJB	Calls and emails to clients regarding updates on case status	0.7	\$580	\$ 406.00
2019-12-31	JJB	Emails and calls with clients regarding updates on case status	1.3	\$580	\$ 754.00
2020-01-02	JJB	Emails with class member re: update on status of the litigation	0.2	\$580	\$ 116.00
2020-01-02	LPL	E-mails with class member Marisol Martinez re: update on the status of the litigation	0.2	\$465	\$ 93.00
2020-01-06	JJB	Emails with class members re: update on status of the litigation	0.2	\$580	\$ 116.00
2020-01-06	JJB	Calls with class members re: update on status of the litigation	2.1	\$580	\$ 1,218.00
2020-01-07	JJB	Calls with class members re: update on status of the litigation	1.1	\$580	\$ 638.00

2020-01-08	LPL	Call back to class member Richard Shipley to update him on the status of the litigation	0.3	\$465	\$ 139.50
2020-01-10	JJB	Emails with class members to update them on the status of the litigation	0.5	\$580	\$ 290.00
2020-01-13	LPL	E-mails with class members to answer their questions on the status of the litigation	0.3	\$465	\$ 139.50
2020-01-13	JJB	Emails with class members to update them on the status of the case	0.7	\$580	\$ 406.00
2020-01-16	LCF	Review and respond to Mr. Hayden's voicemail regarding case status	0.1	\$425	\$ 42.50
2020-01-16	JJB	Emails with clients and class members on case status	0.7	\$580	\$ 406.00
2020-01-17	LPL	E-mails with class member Janet Jenkins re: status of the litigation	0.2	\$465	\$ 93.00
2020-01-17	LPL	Calls with clients/class members to update them on the status of the litigation	0.9	\$465	\$ 418.50
2020-01-20	LCF	Listen to voicemail from Jameel Hayden, draft follow up email to him in response	0.1	\$425	\$ 42.50
2020-01-26	JJB	Draft and circulate client/class member update re case status	0.8	\$580	\$ 464.00
2020-01-27	LCF	Review and respond to correspondence from Ms. Floyd regarding case status	0.1	\$425	\$ 42.50
2020-01-29	LPL	E-mail update to client/class member John MacCue	0.3	\$465	\$ 139.50
2020-02-04	LPL	Call with class member Darin Windsor re: status of the case, class cert decision, and next steps	0.4	\$465	\$ 186.00
2020-02-04	LPL	Call with class member Rosalyn Powell re: background and status of the class action	0.5	\$465	\$ 232.50
2020-02-05	LPL	E-mails with client/class member Colleen Marchese to update her on the status of the case	0.2	\$465	\$ 93.00
2020-02-05	LCF	Review and provide feedback regarding multiple drafts of client/class member update email; review final update, forward copy to Mr. Neal	0.3	\$425	\$ 127.50
2020-02-05	JJB	Emails and calls with clients/class members to update them on the case	0.7	\$580	\$ 406.00

2020-02-05	LPL	Draft, edit, and finalize proposed e-mail update to clients/class members on the class certification order and next steps in the case	1.1	\$465	\$	511.50
2020-02-05	MLS	Review/edit client/class member communication re class cert; emails with team re same	1.2	\$800	\$	960.00
2020-02-06	LCF	Correspond with Jameel Hayden regarding status of case and additional documents submitted	0.2	\$425	\$	85.00
2020-02-06	LPL	E-mails with clients/class members on the status of the litigation and class certification	0.6	\$465	\$	279.00
2020-02-06	JJB	Calls and emails with clients/class members on case status	0.8	\$580	\$	464.00
2020-02-07	LCF	Review correspondence from Ms. Floyd in response to most recent client update, draft and send response to the same	0.1	\$425	\$	42.50
2020-02-07	JJB	Calls with clients on case status	0.7	\$580	\$	406.00
2020-02-10	LPL	E-mails with co-counsel L. Fellows re: follow-up with certain class members/clients on questions they sent via e-mail	0.3	\$465	\$	139.50
2020-02-10	LPL	Call with class rep Debora Granja re: the class certification order, upcoming settlement conference, and upcoming trial	0.7	\$465	\$	325.50
2020-02-10	JJB	Emails and calls with clients on case background and status	1.2	\$580	\$	696.00
2020-02-11	LPL	E-mails with clients/class members to answer their questions on the case and their circumstances	0.2	\$465	\$	93.00
2020-02-11	JJB	Calls with clients/class members on case status	0.7	\$580	\$	406.00
2020-02-19	LPL	E-mails with class members/clients who have written in inquiring about the case	0.3	\$465	\$	139.50
2020-02-26	JJB	Call and emails with class representative S. Campos on case status	0.5	\$580	\$	290.00

2020-02-27	LCF	Receive call from client, Joe Langdon, regarding case status, attempt to return call and leave message, receive response and speak with him regarding case generally, draft and send follow-up correspondence with update and next steps, correspond with Ms. Lam to confirm Mr. Langdon's contact information correct	0.4	\$425	\$ 170.00
2020-02-28	LPL	E-mails with M. Schrag and J. Bloomfield re: responding to class member inquiries to us about the status of the litigation	0.2	\$465	\$ 93.00
2020-03-02	JJB	Call and emails with class representative S. Campos on case status	0.3	\$580	\$ 174.00
2020-03-05	JJB	Calls to clients and class members on case status	0.7	\$580	\$ 406.00
2020-03-06	JJB	Calls and emails with class members on case status	0.6	\$580	\$ 348.00
2020-03-09	LPL	Call with plaintiff Diana Trevino re: update on happenings in the litigation (including MSJ opp. filed last week)	0.3	\$465	\$ 139.50
2020-03-09	LPL	E-mails with class members to respond to inquiries about the case and its status; e-mails with J. Bloomfield re: same	0.5	\$465	\$ 232.50
2020-03-10	LPL	Call with class rep Debora Granja re: the ongoing settlement discussions with Wells Fargo	0.3	\$465	\$ 139.50
2020-03-10	LPL	Call with class member/client Deborah Colon re: update on status of the litigation and her questions about cashing a check from Wells Fargo	0.3	\$465	\$ 139.50
2020-03-11	LPL	Call with class member Megan Hall re: background and status on the litigation, including the class certification order	0.4	\$465	\$ 186.00
2020-03-11	JJB	Calls with clients and class members on case status	0.8	\$580	\$ 464.00
2020-03-12	LPL	E-mail to class member Barbara Dorgan to answer her question about status of the litigation	0.2	\$465	\$ 93.00
2020-03-12	JJB	Calls with clients and class members on case status	0.8	\$580	\$ 464.00

2020-03-14	LCF	Review correspondence from Ms. Gladman regarding additional payment received from Ms. Wells Fargo and outline thoughts regarding the same; draft and send follow-up correspondence to Wells Fargo requesting additional information regarding payment and payments to class members generally	0.2	\$425	\$ 85.00
2020-03-16	LCF	Correspond with Ms. Gladman regarding additional payment from Wells Fargo and next steps	0.2	\$425	\$ 85.00
2020-03-23	LCF	Draft and send follow-up correspondence to Ms. Gladman regarding receipt of additional payment from Wells Fargo	0.1	\$425	\$ 42.50
2020-04-01	MLS	Review/edit communication to clients re proposed settlement; tel. call A. Mura re same	0.9	\$800	\$ 720.00
2020-04-01	LPL	Calls with named plaintiffs Debora Granja and Emma White re: the preliminary approval motion and settlement terms	0.9	\$465	\$ 418.50
2020-04-01	LPL	Work on update e-mail blast to class member-clients; work with J. Bloomfield on culling list of class member clients; e-mails with team re: same	1.6	\$465	\$ 744.00
2020-04-14	RPN	Call with client/class members about the settlement	0.2	\$230	\$ 46.00
2020-04-17	LPL	Call with class representative Debora Granja re: how the hearing on preliminary approval went	0.3	\$465	\$ 139.50
		Project Total:	66.8		\$ 34,664.00
Project: Opp. to Wells Fargo & Company's motion to dismiss					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-05-07	GAM	Review WFC's motion to dismiss, analyze and compile initial thoughts, areas for research, research and analysis re right to amend and approach in conjunction with pending WFB motion	1.6	\$720	\$ 1,152.00

2019-05-08	GAM	Call with MLS re approach to parent company MTD, additional research and follow-up emails	1.1	\$720	\$ 792.00
2019-05-08	MLS	Review WFC MTD and tel. call G. Munroe re same; legal research re amending complaint; conf. R. Paul re same	1.3	\$800	\$ 1,040.00
2019-05-09	MLS	Further review and analyze motion to dismiss WFC; conf. E. Gibbs and R. Paul re same	1	\$800	\$ 800.00
2019-05-13	MLS	Tel. calls with A. Groves re responding to WFC motion; emails with G. Munroe re same; tel. call D. Loesser re same	0.8	\$800	\$ 640.00
2019-05-14	EHG	Confer with MLS re: timing of opposition to WFC's motion to dismiss	0.3	\$910	\$ 273.00
2019-05-14	GAM	Review emails re: parent company MTD briefing and call with MLS to discuss strategy for opposing	0.6	\$720	\$ 432.00
2019-05-14	LPL	Confer with M. Schrag re: whether we should respond to Wells Fargo & Company's motion to dismiss, or amend our complaint in response; draft stipulation regarding the same	0.9	\$465	\$ 418.50
2019-05-14	MLS	Emails, tel. calls w/ co-counsel and def. counsel re: responding to WFC motion to dismiss; review/edit stip; review and analyze legal research re right to amend in response to motion to dismiss.	1.3	\$800	\$ 1,040.00
2019-05-15	MLS	Emails with team re: briefing on WFC's motion to dismiss; discuss same w E. Gibbs	0.5	\$800	\$ 400.00
2019-05-16	MLS	Emails re extension on response to WFC motion to dismiss; review stipulation	0.7	\$800	\$ 560.00
2019-05-16	LPL	Draft and file stipulation, declaration, and proposed order on briefing schedule for Wells Fargo & Company's motion to dismiss	0.9	\$465	\$ 418.50
2019-05-21	LPL	Draft and file stipulation on further extension on briefing schedule for WFC's motion to dismiss; e-mails with defense counsel re: same	0.8	\$465	\$ 372.00

2019-05-24	EHG	Confer with team re: responding to motion, confer with GAM re same	0.5	\$910	\$ 455.00
2019-05-24	MLS	Further review and analyze WFC MTD; emails and calls with team re: research and briefing issues; review RJN in support of motion to dismiss	2.2	\$800	\$ 1,760.00
2019-05-25	LPL	Review and analyze first draft of Plaintiffs' opposition to WFC's motion to dismiss	0.7	\$465	\$ 325.50
2019-05-26	LPL	Review and edit draft of Plaintiffs' opposition to WFC's motion to dismiss	2.9	\$465	\$ 1,348.50
2019-05-27	MLS	Edit opp. to WFC MTD; emails with team re: same	2	\$800	\$ 1,600.00
2019-05-27	LPL	Continue editing draft of Plaintiffs' opposition to WFC's motion to dismiss	2.7	\$465	\$ 1,255.50
2019-05-28	EHG	Review and analyze draft opp. to WFC's motion to dismiss	0.9	\$910	\$ 819.00
2019-05-28	MLS	Further edit opposition to WFC MTD; legal research for the same	3	\$800	\$ 2,400.00
2019-05-28	LPL	Edit, finalize, and file Plaintiffs' opposition to WFC's motion to dismiss along with supporting request for judicial notice	3.6	\$465	\$ 1,674.00
2019-06-07	RMP	Review and analyze proposed joint supplemental brief regarding interplay between WFC and WFB's motion to dismiss	0.3	\$725	\$ 217.50
2019-06-07	LPL	Edits to joint filing on how the order on the Bank's MTD order may affect the holding company's pending MTD	0.6	\$465	\$ 279.00
2019-06-09	LPL	E-mails with team re: edits to joint filing on how the order on the Bank's MTD may affect the holding company's pending MTD	0.2	\$465	\$ 93.00
2019-07-02	GAM	Call with R. Paul and MLS to prepare for hearing on Wells Fargo & Company's MTD	0.8	\$720	\$ 576.00
2019-07-02	MLS	Prep for MTD hearing; meeting with R. Paul re: same	6.5	\$800	\$ 5,200.00
2019-07-02	RMP	Review hot documents to prepare for depositions; prepare for court hearing; travel to San Francisco for court hearing from Kansas City	11.8	\$725	\$ 8,555.00

2019-07-03	LPL	Confer with E. Gibbs and M. Schrag re: how the hearing on WFC's motion to dismiss went, and next steps	0.5	\$465	\$ 232.50
2019-07-03	EHG	Confer with MLS and LPL about hearing on WFC's motion to dismiss and strategy going forward	0.6	\$910	\$ 546.00
2019-07-03	MLS	Further prep for hearing and hearing on WFC's motion to dismiss	3.5	\$800	\$ 2,800.00
2019-07-10	LPL	Review and analyze order on Wells Fargo & Company's motion to dismiss; e-mails with J. Bloomfield re: same	0.5	\$465	\$ 232.50
		Project Total:	55.6		\$ 38,707.00
Project: Named plaintiff depositions (general)					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-05-15	RMP	Prepare for depositions of plaintiffs	0.2	\$725	\$ 145.00
2019-05-23	LLD	Make travel arrangements for clients to attend depositions	1	\$240	\$ 240.00
2019-06-04	GRB	Compile documents to be used for upcoming depositions of plaintiffs	2.8	\$275	\$ 770.00
2019-06-07	LCF	Work on various discovery matters and other logistics and production issues, including next steps and tasks to be completed, related to upcoming deposition and potential changes regarding preparations for depositions	0.5	\$425	\$ 212.50
2019-06-10	LCF	Outline and analyze status of deposition preparations and strategy to handle potential factual/legal issues with respect to the same, including review and analyze Judge Alsup's Standing Order	0.7	\$425	\$ 297.50
2019-06-12	JMC	Prepping deposition files for upcoming named plaintiff depositions	4.8	\$85	\$ 408.00
2019-06-13	JMC	Prepping deposition files for upcoming named plaintiff depositions	5.6	\$85	\$ 476.00
2019-06-14	RMP	Prepare for depositions; work on discovery	2.1	\$725	\$ 1,522.50
2019-06-14	JMC	Prepping deposition files for upcoming named plaintiff depositions	5.6	\$85	\$ 476.00
2019-06-17	JMC	Prepping deposition files for upcoming named plaintiff depositions	1.2	\$85	\$ 102.00
		Project Total:	24.5		\$ 4,649.50

Project: California class member depositions (general)					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-25	LPL	E-mail to team re: WF's subpoenas to absent CA class members	0.3	\$465	\$ 139.50
2019-11-26	MLS	Review subpoenas of absent class members; emails re Teague BK issues; edit email to WF counsel re mediation priv, conf. w L. Lam re same;	1.2	\$800	\$ 960.00
2019-11-26	LCF	Review and analyze California class list and borrowers from California, including attempt to confirm identities of California borrowers; review subpoenas from Wells Fargo to California borrowers; summarize initial information learned regarding California borrowers	1.7	\$425	\$ 722.50
2019-12-02	LPL	E-mails with team re: representing CA class members at their depositions and obtaining their loan files from Wells Fargo	0.5	\$465	\$ 232.50
2019-12-02	LPL	Conf. call with team re: outstanding discovery tasks in Wells Fargo and upcoming depositions of CA class members	0.7	\$465	\$ 325.50
2019-12-02	LCF	Analyze upcoming depositions of California class members, including determining who will defend each deposition, preparing clients, reaching out to other California class members, and general next steps; including outline and analyze thoughts in advance of call with team regarding California class member depositions	1.4	\$425	\$ 595.00
2019-12-02	RMP	Prepare for depositions of California class members; negotiate protocol with opposing counsel; work on discovery issues for trial	1.7	\$725	\$ 1,232.50
2019-12-03	LPL	E-mails to M. Schrag and defense counsel re: Wells Fargo's rolling document production, subpoenas to CA class members, and deposing Sandra Campos instead of Alfonso	0.9	\$465	\$ 418.50

2019-12-04	LPL	E-mails and confer with team re: planning for CA absent class member depositions	1.1	\$465	\$ 511.50
2019-12-05	JBK	Discuss depo defense w/SMT, MLS, LPL.	0.2	\$415	\$ 83.00
2019-12-05	LPL	E-mails with team re: research on claiming emotional distress damages in CA and preparing for upcoming CA class member depositions	0.3	\$465	\$ 139.50
2019-12-05	MLS	Emails re depo coverage and conf. w L. Lam re depo prep	0.3	\$800	\$ 240.00
2019-12-05	LCF	Continue to prepare for depositions of California class members, including analyze additional information to gather for each deponent and finalizing scheduling meetings with clients to prepare for depositions	0.7	\$425	\$ 297.50
2019-12-05	LPL	E-mails and confer with M. Schrag and J. Bloomfield re: upcoming CA absent class member depositions	0.9	\$465	\$ 418.50
2019-12-09	LPL	E-mail to team re: upcoming absent class member deposition schedule	0.4	\$465	\$ 186.00
2019-12-11	JBK	c/w LPL re strategy for coverage of tomorrow's depo.	0.2	\$415	\$ 83.00
2019-12-11	LPL	E-mails with team and confer with J. Kosbie re: planning for defending class member depo tomorrow	0.3	\$465	\$ 139.50
2019-12-11	LPL	Calls to CA class members who reached out to us regarding their deposition subpoenas	0.8	\$465	\$ 372.00
2019-12-12	JBK	c/w Josh re depo assignments. Email SMT.	0.2	\$415	\$ 83.00
2019-12-12	LPL	Confer with M. Schrag, N. Shah, and defense counsel re: remaining depositions of CA class members and those class members' loan files/cap sheets	1.6	\$465	\$ 744.00
2019-12-12	RPN	Prepare potential deposition preparation documents for California plaintiffs, including Torres, Montenegro, Sanchez, Vance, Chavez, Carrol, and Seymour	2.7	\$230	\$ 621.00

2019-12-13	RPN	Prepare potential deposition preparation documents for California plaintiffs, including Torres, Montenegro, Sanchez, Vance, Chavez, Carrol, and Seymour	0.3	\$230	\$ 69.00
2019-12-20	LCF	Call with team regarding remaining California class member, Wells Fargo, and expert witness depositions, including next steps regarding scheduling and preparing for same	0.5	\$425	\$ 212.50
2019-12-22	LCF	Review correspondence from Wells Fargo regarding scheduling depositions of California class members Kimberly Gladman, Derrick Cannon, and Martha Montenegro; correspond with Ms. Lam to confirm proposed dates correct, as well as respond to Ms. Obi to advise Ms. Gladman's deposition to take place in Anaheim	0.2	\$425	\$ 85.00
2019-12-23	LCF	Review subpoenas from Wells Fargo for depositions of additional California class members	0.1	\$425	\$ 42.50
2019-12-27	LCF	Continue to work on remaining California class member depositions, including analyze discovery needed and whether all necessary loan files produced for remaining plaintiffs; analyze remaining Wells Fargo depositions	0.7	\$425	\$ 297.50
2020-01-20	LCF	Review correspondence from Well Fargo and subpoenas to California class members, Mr. Nesbitt and Ms. Torres	0.1	\$425	\$ 42.50
2020-01-21	JJB	Emails with co-counsel re CA class member depos	0.3	\$580	\$ 174.00
2020-01-22	LPL	Call with CA class member Kevin Nesbitt re: background on the case, Nesbitt's facts, and his upcoming deposition; e-mail to team re: same	0.8	\$465	\$ 372.00
2020-01-22	JJB	Calls with co-counsel re CA class member depos	1.5	\$580	\$ 870.00
2020-01-24	JJB	Emails with co-counsel re CA class member depos	0.3	\$580	\$ 174.00

2020-01-24	LPL	Call with CA class member Kevin Nesbitt re: his case and his upcoming deposition	0.3	\$465	\$ 139.50
2020-01-24	LPL	Conf. call with team to discuss certain CA class member depositions and response to WF's admin motion to submit supplemental brief on restitution	0.7	\$465	\$ 325.50
2020-01-27	LPL	E-mail to class member Kevin Nesbitt to confirm our phone conversation about the case and what he intends to do in the case	0.2	\$465	\$ 93.00
2020-01-27	JJB	Emails with Wells Fargo counsel re CA class member depositions	0.3	\$580	\$ 174.00
2020-01-31	LPL	Call with Kevin Nesbitt re: the recent order on class certification and his upcoming deposition	0.3	\$465	\$ 139.50
		Project Total:	24.7		\$ 11,755.00

Project: Deposition of Granja

Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-03	LLD	Prepare documents for prep for upcoming deposition of Ms. Granja	0.8	\$240	\$ 192.00
2019-06-03	GRB	Initial review of documents to be used for prep for upcoming deposition of Ms. Granja	3.5	\$275	\$ 962.50
2019-06-04	LPL	E-mails with named plaintiff D. Granja re: her search for all responsive documents in anticipation of her deposition	0.4	\$465	\$ 186.00
2019-06-04	RMP	Prepare for Debora Granja deposition by reviewing her relevant documents	0.7	\$725	\$ 507.50
2019-06-04	LCF	Prepare for deposition of Ms. Granja, including reviewing and analyzing relevant documents	0.8	\$425	\$ 340.00
2019-06-05	LCF	Continue to work on deposition preparation for Ms. Granja's deposition; further review and search of Wells Fargo's document production to confirm documents not yet produced, draft update to Mr. Paul regarding efforts to locate documents and documents still not in Wells Fargo's production	1	\$425	\$ 425.00

2019-06-05	JJB	Prepare for deposition with client Debora Granja, and L. Lam, M. Schrag and R. Paul	1.9	\$580	\$ 1,102.00
2019-06-05	LPL	Meeting with client Debora Granja, M. Schrag, J. Bloomfield, and co-counsel R. Paul in preparation for Ms. Granja's upcoming deposition	1.9	\$465	\$ 883.50
2019-06-05	LPL	Review named plaintiff Debora Granja's discovery responses, facts in the complaint, and important documents in preparation for her deposition; meeting with M. Schrag and co-counsel re: same	2.9	\$465	\$ 1,348.50
2019-06-05	MLS	Prep for Granja deposition by reviewing her relevant documents	3.5	\$800	\$ 2,800.00
2019-06-05	RMP	Prepare for deposition of Debora Granja; review documents related to Ms. Granja; travel to San Francisco from Kansas City to attend deposition	9.2	\$725	\$ 6,670.00
2019-06-06	LPL	Review newly produced documents regarding named plaintiff Debora Granja in preparation for her deposition	1.1	\$465	\$ 511.50
2019-06-06	LCF	Continue to work on deposition preparation for Ms. Granja's deposition, including review 3,000 plus page last minute production from Wells Fargo for potentially relevant documents, draft thoughts regarding supplemental production and send relevant documents to Mr. Paul and Mr. Schrag	2.2	\$425	\$ 935.00
2019-06-06	JJB	Prepare for deposition with client Debora Granja, and L. Lam, M. Schrag and R. Paul	4.3	\$580	\$ 2,494.00
2019-06-06	LPL	Deposition prep with client Debora Granja, M. Schrag, and co-counsel R. Paul	5	\$465	\$ 2,325.00
2019-06-06	MLS	Prep for Granja depo--meeting w/ client and R. Paul, L. Lam and J. Bloomfield; attend Granja depo; post depo discussion w/ R. Paul and L. Lam	8.5	\$800	\$ 6,800.00

2019-06-06	RMP	Prepare and produce Debora Granja for deposition	9.9	\$725	\$ 7,177.50
2019-06-07	LCF	Receive update regarding first deposition of Ms. Granja, outline thoughts regarding specific issues and preparations for upcoming depositions; work on various discovery matters and other logistics and production issues, including next steps and tasks to be completed, related to upcoming depositions	0.3	\$425	\$ 127.50
2019-06-09	LCF	Continue to prepare for upcoming depositions of the named plaintiffs, including finish review of Ms. Granja's deposition transcript, outline thoughts and notes regarding specific lines of inquiry from the same	2.3	\$425	\$ 977.50
2019-11-01	MLS	Review Granja Depo and J. Bloomfield memo re same; email J. Bloomfield re: same	2.5	\$800	\$ 2,000.00
		Project Total:	62.7		\$ 38,765.00
Project: Deposition of Hernandez					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-07	LPL	E-mail and call to named plaintiff Alicia Hernandez re: meeting to prep for her upcoming deposition	0.3	\$465	\$ 139.50
2019-06-09	LPL	Meeting with M. Schrag and client Alicia Hernandez to prep for her deposition	3.1	\$465	\$ 1,441.50
2019-06-09	MLS	Meet w/ Alicia hernandez to prep for depo; conf. L. Lam re same	3.2	\$800	\$ 2,560.00
2019-06-09	LPL	Review of documents produced by WF regarding named plaintiff Alicia Hernandez in preparation for her deposition	5.4	\$465	\$ 2,511.00
2019-06-10	LPL	Meeting with client Alicia Hernandez for additional prep for her upcoming deposition	0.9	\$465	\$ 418.50
2019-06-10	LPL	Defend deposition of Alicia Hernandez	6.5	\$465	\$ 3,022.50
2019-06-10	MLS	Prep for A. Hernandez depo and attend depo; conf. L. Lam after depo;	7.5	\$800	\$ 6,000.00

2019-07-16	LPL	E-mails with client Alicia Hernandez re: reviewing her deposition transcript for errata	0.1	\$465	\$ 46.50
		Project Total:	27		\$ 16,139.50
Project: Deposition of White					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-12	LLD	Review documents and prepare exhibits for upcoming deposition of Ms. White	1.1	\$240	\$ 264.00
2019-06-13	LLD	Review documents and compile exhibits for upcoming deposition of Ms. White	1.8	\$240	\$ 432.00
2019-06-14	LCF	Prepare for Ms. White's deposition, including work with Ms. Cowger to get copies of relevant documents produced and confirm have "deposition preparation folder" for their depositions	0.9	\$425	\$ 382.50
2019-06-15	LPL	Document review in preparation for Emma White's deposition	1.1	\$465	\$ 511.50
2019-06-15	LCF	Assist with preparations for Ms. White's deposition, including review and analyze selected documents produced by Ms. White and Wells Fargo and outline thoughts/timeline from the same; send summary of thoughts to Ms. Lam	2	\$425	\$ 850.00
2019-06-16	LPL	Document review for Emma White's deposition	3.3	\$465	\$ 1,534.50
2019-06-16	JJB	Travel and meeting in San Francisco with L. Lam and class representative E. White in preparation for deposition	3.6	\$580	\$ 2,088.00
2019-06-16	LPL	Deposition prep meeting with J. Bloomfield and named plaintiff Emma White	3.6	\$465	\$ 1,674.00
2019-06-17	LPL	Calls with M. Schrag and J. Bloomfield re: how Emma White's deposition went, and plan for the DeMartino depositions	0.3	\$465	\$ 139.50
2019-06-17	LPL	Deposition prep meeting with named plaintiff Emma White	4	\$465	\$ 1,860.00
2019-06-17	LPL	Defend deposition of named plaintiff Emma White	5	\$465	\$ 2,325.00

		Project Total:	26.7		\$ 12,061.00
Project: Deposition of Frye					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-05-22	LCF	Correspond with Mr. Frye regarding his deposition availability and anticipated timing to review draft discovery responses; draft update to co-counsel regarding potential dates	0.4	\$425	\$ 170.00
2019-06-03	LCF	Continue to work on deposition preparations for Mr. Frye, including confirming deposition and gathering documents and information needed to prepare	0.3	\$425	\$ 127.50
2019-06-06	LCF	Continue to prepare for Mr. Frye's deposition, including review additional documents received from him and analyze if responsive, instruct Ms. Davis regarding preparing documents to be produced	0.8	\$425	\$ 340.00
2019-06-07	LCF	Continue to prepare for Mr. Frye's deposition, including review bates stamped documents from him to produce in advance of his deposition, work with Ms. Davis to fix various issues/legibility of same, send final bates stamped documents to Ms. Lam to be produced, review correspondence from Ms. Lam to Wells Fargo's counsel producing documents for Mr. Frye	0.5	\$425	\$ 212.50
2019-06-07	LCF	Continue to prepare for upcoming deposition of Mr. Frye, including review, analyze, and decide whether copies needed of documents produced by Wells Fargo, confirm all relevant documents for each plaintiff assembled for "deposition preparation folder" to take to San Francisco, begin to review and analyze documents related to Mr. Frye and outline timeline/thoughts regarding the same	1.9	\$425	\$ 807.50

2019-06-09	LCF	Continue to prepare for Mr. Frye's deposition, including continue to review, analyze, and create timeline of relevant facts and dates from documents regarding Mr. Frye and begin to review Wells Fargo's large, supplemental document production related to Mr. Frye; assist with review and analysis of potentially relevant documents from Wells Fargo's last minute supplemental production for Ms. Hernandez, send thoughts regarding specific documents to Ms. Lam	5.3	\$425	\$ 2,252.50
2019-06-10	LCF	Continue to prepare for Mr. Frye's deposition, including continue to review, analyze, and create timeline of relevant facts and dates from documents regarding Mr. Frye and continue to review Wells Fargo's large, supplemental document production related to Mr. Frye; meet with Mr. Frye to review and prepare for his deposition	8.8	\$425	\$ 3,740.00
2019-06-11	JJB	Deposition preparation with class representative T. Frye	1.9	\$580	\$ 1,102.00
2019-06-11	LCF	Represent Mr. Frye in his deposition, including meet with him to prepare before deposition and review deposition and next steps with him after deposition	5.3	\$425	\$ 2,252.50
2019-06-11	JJB	Attend deposition of Mr. Frye with co-counsel L. Fellows	5.9	\$580	\$ 3,422.00
		Project Total:	31.1		\$ 14,426.50
Project: Deposition of Simoneaux					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-05-09	LCF	Work on named plaintiffs' depositions, including review deposition notice to Mr. and Mrs. Simoneaux, correspond with them regarding deposition and next steps	0.2	\$425	\$ 85.00

2019-05-28	LCF	Continue to work on deposition scheduling, correspond with Wells Fargo regarding double tracking Mr. and Mrs. Simoneaux's depositions; correspond with Mrs. Simoneaux regarding deposition	0.2	\$425	\$ 85.00
2019-06-03	LCF	Begin to work on deposition preparations for Mr. and Mrs. Simoneaux, including confirming deposition and gathering documents and information needed to prepare	0.2	\$425	\$ 85.00
2019-06-04	LCF	Prepare for deposition of Mr. and Mrs. Simoneaux, including review relevant documents	0.8	\$425	\$ 340.00
2019-06-06	LCF	Correspond with Ms. Simoneaux regarding deposition next week and logistics to travel for and prepare for the same, including draft follow-up correspondence to her	0.4	\$425	\$ 170.00
2019-06-06	LCF	Continue to prepare for Mr. and Mrs. Simoneaux's depositions, including review and analyze documents produced by nad regarding Mr. and Mrs. Simoneaux	0.5	\$425	\$ 212.50
2019-06-07	LCF	Continue to prepare for upcoming depositions of Mr. and Mrs. Simoneaux, including review, analyze, and decide whether copies needed of documents produced by Wells Fargo, confirm all relevant documents for each plaintiff assembled for "deposition preparation folder" to take to San Francisco	1.9	\$425	\$ 807.50
2019-06-11	JJB	Preparation for depositions of class representatives B. Simoneaux and R. Simoneaux with L. Lam, M. Schrag and co-counsel L. Fellows	1.8	\$580	\$ 1,044.00
2019-06-11	LCF	Finalize reviewing documents produced by Wells Fargo regarding Mr. and Mrs. Simoneaux and meet with them regarding the same and deposition preparations	2.8	\$425	\$ 1,190.00

2019-06-12	LPL	Conf. call with J. Bloomfield and co-counsel re: how the Simoneauxs' depositions went, and the plan for next week's depositions	0.4	\$465	\$ 186.00
2019-06-12	JJB	Attend portion of deposition of Mrs. Simoneaux with co-counsel L. Fellows	1.3	\$580	\$ 754.00
2019-06-12	JJB	Deposition preparation with class representatives B. Simoneaux and R. Simoneaux	1.8	\$580	\$ 1,044.00
2019-06-12	JJB	Defend deposition of Mr. Simoneaux	3.4	\$580	\$ 1,972.00
2019-06-12	LCF	Represent Ms. Simoneaux in her deposition, including meet with her to finalize preparations before deposition, review deposition and next steps with her after deposition; outline and analyze thoughts regarding Mr. and Mrs. Simoneaux's depositions and potential impact of the same on remaining depositions	6.4	\$425	\$ 2,720.00
2019-06-18	LCF	Correspond with Ms. Simoneaux regarding deposition and next steps generally	0.1	\$425	\$ 42.50
		Project Total:	22.2		\$ 10,737.50

Project: Deposition of Trevino

Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-04	LCF	Prepare for deposition of Ms. Trevino, including review relevant documents	0.8	\$425	\$ 340.00
2019-06-06	LCF	Continue to work on preparations for Ms. Trevino's depositions	0.5	\$425	\$ 212.50
2019-06-07	LCF	Continue to prepare for upcoming deposition of Ms. Trevino, including review, analyze, and decide whether copies needed of documents produced by Wells Fargo related to each plaintiff, confirm all relevant documents for each plaintiff assembled for "deposition preparation folder" to take to San Francisco	1.9	\$425	\$ 807.50
2019-06-11	LPL	Document review of Diana Trevino's documents in preparation for her deposition	1.9	\$465	\$ 883.50

2019-06-12	LCF	Assist with preparing Ms. Trevino for her deposition, including meet with Ms. Trevino to outline specific questions and facts	1	\$425	\$ 425.00
2019-06-12	LPL	Review documents in preparation for client Diana Trevino's upcoming deposition	2.1	\$465	\$ 976.50
2019-06-12	LPL	Meeting with client Diana Trevino to prep her for her upcoming deposition	3.7	\$465	\$ 1,720.50
2019-06-13	LPL	Call with M. Schrag re: how Ms. Trevino's deposition went, and plans for next week's plaintiff depositions	0.2	\$465	\$ 93.00
2019-06-13	LPL	Meeting with co-counsel L. Fellows and named plaintiff Diana Trevino to prep for Ms. Trevino's deposition	1	\$465	\$ 465.00
2019-06-13	LPL	Defend deposition of named plaintiff Diana Trevino	6.6	\$465	\$ 3,069.00
2019-06-13	LCF	Assist with representation of Ms. Trevino in her deposition, including meet with her to finalize preparations before deposition, review deposition and next steps with her after deposition	7.5	\$425	\$ 3,187.50
		Project Total:	27.2		\$ 12,180.00

Project: Deposition of DeMartino

Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-13	JJB	Review documents of class representatives J. and Y. DeMartino	1.7	\$580	\$ 986.00
2019-06-13	LLD	Review documents and compile exhibits for upcoming deposition of Mr. DeMartino	1.7	\$240	\$ 408.00
2019-06-14	LCF	Prepare for Mr. and Mrs. DeMartino's depositions, including work with Ms. Cowger to get copies of relevant documents produced and confirm have "deposition preparation folder" for their depositions	0.9	\$425	\$ 382.50
2019-06-17	JJB	Review and analyze DeMartino documents in preparation for depositions	4	\$580	\$ 2,320.00
2019-06-18	LPL	Deposition prep meeting with J. Bloomfield and named plaintiffs J. and Y. DeMartino	0.7	\$465	\$ 325.50

2019-06-18	JJB	Defend deposition of Y. DeMartino in San Francisco	3.8	\$580	\$ 2,204.00
2019-06-18	JJB	Defend deposition of J. DeMartino in San Francisco	4.1	\$580	\$ 2,378.00
2019-06-18	LPL	Depositions of named plaintiffs John and Yvonne DeMartino	8	\$465	\$ 3,720.00
2019-06-19	LPL	Confer with M. Schrag and J. Bloomfield re: how the DeMartino depositions went, and plan for upcoming plaintiff depositions	0.4	\$465	\$ 186.00
		Project Total:	25.3		\$ 12,910.00
Project: Deposition of Wilson					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-12	LLD	Review documents and prepare exhibits for upcoming depositions of Ms. Wilson	1.1	\$240	\$ 264.00
2019-06-18	JJB	Begin review of R. Wilson documents in preparation for her deposition	2.2	\$580	\$ 1,276.00
2019-06-19	LCF	Assist with preparations for Ms. Wilson's deposition, including correspond with Ms. Lam regarding Ms. Wilson's relevant facts and documents	0.2	\$425	\$ 85.00
2019-06-19	LPL	Document review in preparation for named plaintiff Rose Wilson's deposition; call with co-counsel L. Fellows re: same	1.6	\$465	\$ 744.00
2019-06-19	JJB	Meeting with L. Lam and R. Wilson in preparation for her deposition	3	\$580	\$ 1,740.00
2019-06-19	LPL	Meeting with client Rose Wilson and J. Bloomfield to prep Ms. Wilson for her upcoming deposition	3	\$465	\$ 1,395.00
2019-06-19	JJB	Review R. Wilson documents	3.6	\$580	\$ 2,088.00
2019-06-20	MLS	Confer with J. Bloomfield re: Wilson depo.	0.3	\$800	\$ 240.00
2019-06-20	JJB	Meeting with R. Wilson in preparation for deposition	1.2	\$580	\$ 696.00
2019-06-20	JJB	Defend deposition of R. Wilson in San Francisco	6.2	\$580	\$ 3,596.00
2019-07-01	LCF	Review and respond to correspondence from Ms. Wilson following up from deposition, forward to Ms. Lam and Mr. Bloomfield	0.1	\$425	\$ 42.50

		Project Total:	22.5		\$ 12,166.50
Project: Deposition of Teague					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-25	JJB	Review documents in preparation for deposition of C. Teague	2	\$580	\$ 1,160.00
2019-06-26	JJB	Review documents in preparation for C. Teague deposition	1.7	\$580	\$ 986.00
2019-06-26	JJB	Deposition preparation session with C. Teague	2.4	\$580	\$ 1,392.00
2019-06-26	JJB	Travel to Chicago for deposition of C. Teague	3.3	\$580	\$ 1,914.00
2019-06-27	JJB	Deposition preparation session with C. Teague	1.2	\$580	\$ 696.00
2019-06-27	JJB	Defend deposition of C. Teague	6.8	\$580	\$ 3,944.00
2019-06-28	JJB	Return from Chicago to Oakland after deposition of C. Teague	4.9	\$580	\$ 2,842.00
		Project Total:	22.3		\$ 12,934.00
Project: Deposition of Hood					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-24	JJB	Review T. Hood documents in preparation for deposition	1.4	\$580	\$ 812.00
2019-06-24	JJB	Deposition preparation session with T. Hood	1.5	\$580	\$ 870.00
2019-06-24	JJB	Travel to Cincinnati for T. Hood deposition	6	\$580	\$ 3,480.00
2019-06-25	JJB	Review T. Hood documents in preparation for deposition	1.3	\$580	\$ 754.00
2019-06-25	JJB	Deposition preparation session with T. Hood	1.5	\$580	\$ 870.00
2019-06-25	JJB	Defend deposition of T. Hood	5.8	\$580	\$ 3,364.00
		Project Total:	17.5		\$ 10,150.00
Project: Deposition of Floyds					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-05-09	LCF	Work on named plaintiffs' depositions, including review deposition notice to Mr. and Mrs. Floyd correspond with them regarding deposition and next steps	0.2	\$425	\$ 85.00
2019-05-28	LCF	Correspond with Mr. and Mrs. Floyd regarding upcoming deposition and anticipated preparations for the same	0.1	\$425	\$ 42.50

2019-06-13	LLD	Review documents and compile exhibits for upcoming depositions of Mr. and Mrs. Floyd	1.8	\$240	\$ 432.00
2019-06-17	LLD	Prepare exhibits for upcoming depositions of Mr. and Mrs. Floyd	2.8	\$240	\$ 672.00
2019-06-20	LCF	Draft correspondence to Mr. and Mrs. Floyd regarding upcoming depositions and scheduling time to meet and prepare for the same, receive call from Ms. Floyd and discuss deposition preparation dates and times, send follow-up correspondence to Mr. Bloomfield confirming deposition preparation dates and locations	0.6	\$425	\$ 255.00
2019-06-21	LCF	Draft summary of relevant dates, times, and locations for Mr. and Mrs. Floyd's depositions, as well as send deposition notices and final discovery responses to Mr. and Mrs. Floyd; update Mr. Bloomfield regarding dates and times for deposition preparation	0.3	\$425	\$ 127.50
2019-06-28	LCF	Continue to prepare for deposition of George and Cyndi Floyd, including review, analyze, and edit documents regarding the Floyds and documents to potentially discuss with them during preparation	1.4	\$425	\$ 595.00
2019-06-30	LCF	Continue to prepare for depositions of Mr. and Mrs. Floyd, including continue to review and analyze documents regarding the Floyds and prepare to meet with the Floyds in advance of their depositions	1.8	\$425	\$ 765.00

2019-07-01	LCF	Continue to prepare for depositions of Mr. and Mrs. Floyd, including continue to review and analyze documents regarding the Floyds in preparation for meeting with them, draft list of questions to discuss; and meet with Mr. and Mrs. Floyd to prepare for depositions; outline and analyze specific factual question regarding Mr. and Mrs. Floyd with Mr. Paul and follow-up with them regarding the same	6.5	\$425	\$ 2,762.50
2019-07-02	LCF	Represent Ms. Floyd in her deposition; represent Mr. Floyd in his deposition, including meet with Mr. and Mrs. Floyd for final preparations in advance of depositions; outline and analyze thoughts regarding depositions and next steps with Mr. Paul	9.7	\$425	\$ 4,122.50
		Project Total:	25.2		\$ 9,859.00
Project: Deposition of Lindner					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-20	JJB	Meeting with L. Lam and K. Lindner in preparation for his deposition	3	\$580	\$ 1,740.00
2019-06-20	LPL	Deposition prep meeting with J. Bloomfield and named plaintiff Keith Lindner	3	\$465	\$ 1,395.00
2019-06-20	LPL	Document review in preparation for Keith Lindner's deposition	3.1	\$465	\$ 1,441.50
2019-06-21	MLS	Conf. with L. Lam re Linder depo and discovery tasks including new interros to draft	0.5	\$800	\$ 400.00
2019-06-21	LPL	Deposition prep meeting with named plaintiff Keith Lindner	0.5	\$465	\$ 232.50
2019-06-21	LPL	Confer with M. Schrag re: how the Keith Lindner deposition went, and outstanding discovery tasks in the case	0.7	\$465	\$ 325.50
2019-06-21	LPL	Defend deposition of named plaintiff Keith Lindner	4.7	\$465	\$ 2,185.50
		Project Total:	15.5		\$ 7,720.00

Project: Motion to compel/Wells Fargo's motion for protective order on Rule 30(b)(6) topics (July 2019 hearing)					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-24	LCF	Correspond with Mr. Schrag, Ms. Lam, and Ms. Schwarz to outline and analyze strategy regarding obtaining additional documents from Wells Fargo, scope of documents, and timing to complete, as well as analyze response to Wells Fargo's Letter Brief regarding 30(b)(6) topics, and letter brief to draft regarding documents Wells Fargo refuses to produce; including analyze draft correspondence from Mr. Schrag to Ms. Groves regarding outstanding documents to be produced by Wells Fargo and provide feedback regarding additional custodians to add to letter as not yet produced; revise draft letter and send revisions to Mr. Schrag	1.2	\$425	\$ 510.00
2019-06-24	LCF	Finish initial review and analysis of Wells Fargo's discovery responses and documents to prepare for letter brief/motion to compel on documents they are refusing to produce, including send initial summary to Ms. Lam for review and feedback	1.3	\$425	\$ 552.50
2019-06-24	LPL	Draft letter brief in response to WF's letter to Court on 30(b)(6) topics	2.1	\$465	\$ 976.50
2019-06-24	MLS	Review WF discovery letter; conf. call team re various discovery matters and plaintiff depositions; discuss response to discovery letter re audit/compliance testimony; draft meet/confer email to A.Groves; emails and conf. L. Lam re above	3.5	\$800	\$ 2,800.00
2019-06-25	MLS	Work on discovery dispute letters; conf. L. Lam and L. Fellows re same	2	\$800	\$ 1,600.00
2019-06-25	LPL	Review and edit draft letter brief on WF's responses to Plaintiffs' first set of requests for production; confer with M. Schrag and co-counsel L. Fellows re: same	2.7	\$465	\$ 1,255.50

2019-06-25	LCF	Draft discovery dispute letter to submit to Court regarding Wells Fargo's responses to specific Requests for Production, including instruct Mr. Brand regarding obtaining his assistance to work on draft letter and review his draft, substantially revise draft and circulate draft letter to team for further review; analyze draft letter and additional requests for production to include with Mr. Schrag and Ms. Lam	3.5	\$425	\$ 1,487.50
2019-06-25	GAM	Review draft letter brief opposing WF's motion for a protective order, write introduction, comment on substantive sections, and emails with L. Lam re same	3.8	\$720	\$ 2,736.00
2019-06-25	LPL	Draft letter brief in response to Wells Fargo's letter brief on 30(b)(6) topics; confer with M. Schrag re: same	4	\$465	\$ 1,860.00
2019-06-25	GRB	Drafted letter to the court regarding ongoing discovery disputes with opposing counsel	4.5	\$275	\$ 1,237.50
2019-06-26	LCF	Assist with draft discovery letter to submit to Court in response to Wells Fargo's 30(b)(6) discovery letter, including review draft from Ms. Lam and provide proposed edits to the same	0.2	\$425	\$ 85.00
2019-06-26	MLS	Tel calls and emails with L. Lam re: discovery letters	0.5	\$800	\$ 400.00
2019-06-26	GAM	Edit letter brief re compelling WF document production, emails to L. Lam re same and re additional RPDs to issue	1.1	\$720	\$ 792.00
2019-06-26	LPL	Edits to letter brief on Wells Fargo's request for a protective order as to two 30(b)(6) topics	1.6	\$465	\$ 744.00

2019-06-26	LCF	Assist with finalizing discovery dispute letter to submit to Court regarding Wells Fargo's responses to specific Requests for Production, including revise draft letter to incorporate additional requests for production and review notes from prior calls and letters with Wells Fargo regarding those requests, and circulate revised draft to team along with update regarding all Request for Production served and status of each Request for Production; analyze revisions with Ms. Lam, including strategize regarding deleting Request for Production from the draft, review and provide feedback regarding revised draft letter, work with Ms. Lam on exhibits for the letter	2.9	\$425	\$ 1,232.50
2019-06-26	LPL	Edits, finalize, and file draft letter brief on Wells Fargo's responses to first set of requests for production	4.6	\$465	\$ 2,139.00
2019-06-27	GAM	Call with L. Lam in preparation for discovery hearing	0.4	\$720	\$ 288.00
2019-06-27	LPL	Finalize and file response to WF's letter brief on 30(b)(6) topics	0.7	\$465	\$ 325.50
2019-06-28	LCF	Assist with preparations for Hearing/Meet and Confer regarding Wells Fargo's discovery responses and 30(b)(6) topics, including analyze discovery sought and strategy with Ms. Lam, as well as locate and forward relevant documents to be used to assist with meet and confer	1.3	\$425	\$ 552.50
2019-06-28	LPL	Review briefing, cases, and notes in preparation for hearing on discovery disputes over 30(b)(6) topics and certain document requests	5.3	\$465	\$ 2,464.50
2019-06-30	MLS	Prep for discovery hearing; tel. calls R. Paul and L. Lam re same	2.5	\$800	\$ 2,000.00
2019-06-30	LPL	Review notes and documents to prep for discovery dispute hearing on 30(b)(6) topics and certain documents that WF will not produce; calls with M. Schrag re: same	6.2	\$465	\$ 2,883.00

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2019-07-01	LPL	Hearing with Judge Alsup on discovery disputes on 30(b)(6) topics and certain document requests	0.4	\$465	\$ 186.00
2019-07-01	LPL	Review notes and documents to prep for discovery dispute hearing on 30(b)(6) topics and certain documents that WF will not produce	2.2	\$465	\$ 1,023.00
2019-07-01	LPL	Meet and confer with WF regarding discovery disputes on 30(b)(6) topics and document requests	3.5	\$465	\$ 1,627.50
2019-07-01	MLS	Discovery in-court meet and confer with WF counsel; Discovery Hearing; conf. L. Lam re same	4.5	\$800	\$ 3,600.00
		Project Total:	66.5		\$ 35,358.00
Project: Robert Ferguson 30(b)(6) deposition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-07-01	AGS	Review and prepare new Wells Fargo production for uploading into Everlaw; begin review of new documents; begin preparing for Topic 5 of 30(b)(6) deposition	1.3	\$575	\$ 747.50
2019-07-01	GRB	Research foreclosure procedures in preparation for upcoming deposition	1.8	\$275	\$ 495.00
2019-07-02	GRB	Research foreclosure procedures in preparation for upcoming deposition	3.5	\$275	\$ 962.50
2019-07-03	GRB	Research recent case law in preparation for upcoming deposition	0.8	\$275	\$ 220.00
2019-07-03	RMP	Conference with opposing counsel regarding depositions; review hot documents to prepare for depositions	3	\$725	\$ 2,175.00
2019-07-03	AGS	Prepare for 30(b)(6) depositions	4	\$575	\$ 2,300.00
2019-07-05	RMP	Prepare for deposition of Ferguson	1	\$725	\$ 725.00
2019-07-08	LCF	Continue to assist with preparations for 30(b)(6) deposition on topic 5, Wells Fargo's foreclosure processes, including assist with locating relevant mortgage documents and other documents for potential exhibits, and outline and analyze strategy for deposition with Mr. Paul	1.1	\$425	\$ 467.50
2019-07-08	AGS	Prepare for 30(b)(6) Topic 5 deposition	3.1	\$575	\$ 1,782.50

2019-07-08	RMP	Prepare to depose corporate representative; work on proposed Amended Complaint	3.2	\$725	\$ 2,320.00
2019-07-09	LCF	Continue to assist with preparations for 30(b)(6) Ferguson deposition on topic 5, Wells Fargo's foreclosure processes, including continue to outline and analyze strategy for deposition with Mr. Paul and analyze facts regarding specific documents for deposition	0.5	\$425	\$ 212.50
2019-07-09	RMP	Prepare for 30(b)(6) Ferguson deposition; travel to Portland, Oregon	11	\$725	\$ 7,975.00
2019-07-10	LCF	Continue to assist with deposition of Wells Fargo's Corporate Representative on Topic 5- Foreclosure Procedures, including analyze potential lines of inquiry and receive update regarding facts learned after deposition	0.5	\$425	\$ 212.50
2019-07-10	RMP	Depose Robert Ferguson; work on Second Amended Complaint; review hot documents; return travel to Kansas City	8.9	\$725	\$ 6,452.50
2019-07-22	MLS	Review Ferguson depo and hot docs	1.8	\$800	\$ 1,440.00
2019-07-24	MLS	Review Ferguson depo and hot docs	0.5	\$800	\$ 400.00
2019-08-03	LCF	Review Mr. Ferguson's deposition transcript	1	\$425	\$ 425.00
		Project Total:	47		\$ 29,312.50
Project: Carmen Bell 30(b)(6) deposition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-07-01	LCF	Work on identifying documents related to 30(b)(6) topics, and result of meet and confer with Wells Fargo and Court's forthcoming Order from the same	0.2	\$425	\$ 85.00
2019-07-08	LCF	Work on locating other information and potential exhibits in preparation for Ms. Bell's deposition	1.9	\$425	\$ 807.50
2019-07-15	RMP	Prepare for corporate representative deposition; review hot documents	1.6	\$725	\$ 1,160.00
2019-07-16	RMP	Prepare for corporate representative deposition	1.5	\$725	\$ 1,087.50

2019-07-19	RMP	Prepare for 30(b)(6) deposition	0.9	\$725	\$ 652.50
2019-07-20	RPN	Prepare potential exhibits for the 30(b)(6) deposition of Carmen Bell	5.8	\$230	\$ 1,334.00
2019-07-22	RMP	Identify potential exhibits for 30(b)(6) deposition; prepare for deposition	1.9	\$725	\$ 1,377.50
2019-07-23	RMP	Prepare for 30(b)(6) deposition	2	\$725	\$ 1,450.00
2019-07-24	RMP	Prepare for 30(b)(6) deposition; research Federal Housing Administration requirements for loan servicers	1.7	\$725	\$ 1,232.50
2019-07-24	LCF	Continue to assist with preparations for 30(b)(6) deposition of Carmen Bell, including continue to review and analyze potential deposition exhibits, and begin to outline thoughts regarding deposition questions	2.6	\$425	\$ 1,105.00
2019-07-25	RMP	Prepare for deposition	0.2	\$725	\$ 145.00
2019-07-25	RPN	Prepare potential exhibits for the 30(b)(6) deposition of Carmen Bell	0.4	\$230	\$ 92.00
2019-07-25	LCF	Continue to assist with preparations for 30(b)(6) deposition of Carmen Bell, including continue to review and analyze potential deposition exhibits, as well as finish initial review and subjective coding of documents produced from Ms. Bell's custodian file; outline and analyze next steps to finish review of all "hot" documents and narrowing same for Mr. Bell's deposition	8.4	\$425	\$ 3,570.00
2019-07-26	LCF	Correspond with co-counsel and team regarding strategy to prepare for Carmen Bell 30(b)(6) deposition, review documents, class certification, and discovery supplements; outline tasks, assign tasks, and discuss general next steps	0.5	\$425	\$ 212.50
2019-07-26	RPN	Prepare potential exhibits for the 30(b)(6) deposition of Carmen Bell	0.7	\$230	\$ 161.00
2019-07-26	RMP	Prepare for 30(b)(6) deposition	0.9	\$725	\$ 652.50
2019-07-26	JJB	Review documents newly produced by Wells Fargo in preparation for 30(b)(6) deposition	1.9	\$580	\$ 1,102.00

2019-07-26	LCF	Continue to assist with preparations for 30(b)(6) deposition of Carmen Bell, including continue to review and analyze potential deposition exhibits, as well as review newly marked "hot" documents and analyze the same as potential deposition exhibits	4.5	\$425	\$ 1,912.50
2019-07-28	RMP	Prepare for 30(b)(6) deposition	0.6	\$725	\$ 435.00
2019-07-28	LCF	Continue to review and analyze "hot" documents for potential exhibits in preparation for Carmen Bell 30(b)(6) deposition, including analyze whether specific documents produced and begin to outline thoughts regarding next steps to obtain the same	5.4	\$425	\$ 2,295.00
2019-07-29	JJB	Research time limits for witness testifying in dual capacity	0.9	\$580	\$ 522.00
2019-07-29	RPN	Prepare potential exhibits for the 30(b)(6) deposition of Carmen Bell	2	\$230	\$ 460.00
2019-07-29	JJB	Review documents newly produced by Wells Fargo in preparation for 30(b)(6) deposition	2.7	\$580	\$ 1,566.00
2019-07-29	LCF	Continue to review, analyze, and outline thoughts regarding potential deposition exhibits for Topics 2 and 8 of Carmen Bell 30(b)(6) deposition, as well as outline thoughts regarding whether we have specific documents regarding committees, instant messages, and for the "related" 184 borrower error	7.4	\$425	\$ 3,145.00
2019-07-30	RPN	Prepare potential exhibits for the 30(b)(6) deposition of Carmen Bell	2	\$230	\$ 460.00
2019-07-30	JJB	Review documents newly produced by Wells Fargo in preparation for 30(b)(6) deposition	2.3	\$580	\$ 1,334.00

2019-07-30	LCF	Continue to assist with preparations for Carmen Bell 30(b)(6) deposition, including begin to continue to analyze documents for topics 2 and 8, as well as begin to analyze documents for topics 3, 4, 6, and 7; begin to draft outline of questions for Ms. Bell; work with Mr. Neal to print relevant potential exhibits for Mr. Paul to review further	9.2	\$425	\$ 3,910.00
2019-07-31	JJB	Review documents newly produced by Wells Fargo in preparation for 30(b)(6) deposition	1.8	\$580	\$ 1,044.00
2019-07-31	MLS	Review and highlight hot docs to prep 30b6 depo	2.8	\$800	\$ 2,240.00
2019-07-31	LCF	Continue to assist with preparations for Carmen Bell 30(b)(6) deposition, including continue to review and analyze potential deposition exhibits and work on Ms. Bells' deposition outline; finish gathering documents and drafting outline regarding topic 3, 6, and 7; identify most relevant documents and revise draft deposition outline	7.3	\$425	\$ 3,102.50
2019-07-31	RMP	Prepare for 30(b)(6) deposition	7.3	\$725	\$ 5,292.50
2019-08-01	MLS	Prep for 30b6 depo, review documents; conf. R. Paul re 30b6 depo;	4.5	\$800	\$ 3,600.00
2019-08-01	LCF	Continue to assist with preparations for Carmen Bell 30(b)(6) deposition, including continue to review and analyze potential deposition exhibits and work on Ms. Bells' deposition outline, finish drafting section regarding topic 4 and revise topics 6 and 7; assist with finalizing deposition exhibits and sending same to co-counsel's office to be printed/prepared	7.5	\$425	\$ 3,187.50
2019-08-01	RMP	Prepare for Carmen Bell 30(b)(6) deposition; travel to San Francisco from Kansas City	11.5	\$725	\$ 8,337.50

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2019-08-02	MLS	Prep w/ R. Paul re 30(b)(6) depo; attend Carmen Bell 30(b)(6) depo; conf. R. Paul after depo	10.5	\$800	\$ 8,400.00
2019-08-02	RMP	Prepare for and take Carmen Bell 30(b)(6) deposition	10.8	\$725	\$ 7,830.00
2019-08-03	RMP	Return travel from 30(b)(6) deposition of Carmen Bell; evaluate testimony useful for class certification	3.4	\$725	\$ 2,465.00
		Project Total:	137.5		\$ 77,765.00
Project: Diane Young deposition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-07-08	LCF	Assist with preparations for Ms. Young's deposition, including analyze documents produced from her custodian file and update Mr. Bloomfield regarding scope of documents produced regarding Ms. Young	0.4	\$425	\$ 170.00
2019-07-15	JJB	Review documents in preparation for deposition of D. Young	5.3	\$580	\$ 3,074.00
2019-07-16	JJB	Review documents in preparation for deposition of D. Young	5.9	\$580	\$ 3,422.00
2019-07-17	JJB	Finalize exhibits for D. Young deposition	2.6	\$580	\$ 1,508.00
2019-07-17	JJB	Travel to Minneapolis for D. Young deposition	6.8	\$580	\$ 3,944.00
2019-07-18	JJB	Review exhibits and create outline in preparation to take deposition of D. Young	9.2	\$580	\$ 5,336.00
2019-07-19	JJB	Final preparation for deposition of D. Young	2.4	\$580	\$ 1,392.00
2019-07-19	JJB	Take deposition of D. Young	7.2	\$580	\$ 4,176.00
2019-07-20	JJB	Return from Minneapolis to Oakland after deposition of D. Young	6.6	\$580	\$ 3,828.00
2019-07-25	MLS	Review Diane Young Depo	1.7	\$800	\$ 1,360.00
2019-08-03	LCF	Begin to review deposition transcript from Ms. Young's deposition	0.7	\$425	\$ 297.50
2019-08-06	LCF	Finish review of deposition transcript from Ms. Young's deposition and outline thoughts regarding the same	1.2	\$425	\$ 510.00
		Project Total:	50		\$ 29,017.50

Project: Beena Menon deposition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-08-12	JJB	Review documents and deposition testimony in preparation for deposition of B. Menon	2.4	\$580	\$ 1,392.00
2019-08-14	JJB	Review potential exhibits for Beena Menon deposition	1.8	\$580	\$ 1,044.00
2019-08-15	JJB	Review potential exhibits for deposition of B. Menon	1.4	\$580	\$ 812.00
2019-08-15	JJB	Work on outline for deposition of B. Menon	3.5	\$580	\$ 2,030.00
2019-08-16	JJB	Emails with Wells Fargo counsel re B. Menon deposition	0.4	\$580	\$ 232.00
2019-08-16	JJB	Work on outline for deposition of B. Menon	1.9	\$580	\$ 1,102.00
2019-08-16	JJB	Review potential exhibits for deposition of B. Menon	3.3	\$580	\$ 1,914.00
2019-08-19	JJB	Coordinate with N. Shah re preparation of exhibits for B. Menon deposition	0.6	\$580	\$ 348.00
2019-08-19	NS	Compiling documents in anticipation of deposition	0.9	\$415	\$ 373.50
2019-08-19	JJB	Finalize B. Menon deposition outline	3.2	\$580	\$ 1,856.00
2019-08-20	JJB	Final review and selection of exhibits and preparation for deposition of B. Menon	5.3	\$580	\$ 3,074.00
2019-08-21	JJB	Review and organize exhibits for B. Menon deposition	1.3	\$580	\$ 754.00
2019-08-21	JJB	Travel from Jacksonville to Charlotte for B. Menon deposition	3.3	\$580	\$ 1,914.00
2019-08-21	JJB	Return travel to Jacksonville after B. Menon deposition	3.5	\$580	\$ 2,030.00
2019-08-21	JJB	Take deposition of B. Menon	6.1	\$580	\$ 3,538.00
2019-09-15	LCF	Begin review of Ms. Menon's deposition transcript and outlining thoughts regarding facts learned through the same	1	\$425	\$ 425.00
2019-09-16	LCF	Finish review of Ms. Menon's deposition transcript and outlining thoughts regarding facts learned through the same	0.3	\$425	\$ 127.50
		Project Total:	40.2		\$ 22,966.00

Project: Second amended complaint / motion for leave to amend					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-06-24	GAM	Emails with MLS and R. Paul re possibility of moving to amend and WF's motion for protective order; prep for call to discuss	0.4	\$720	\$ 288.00
2019-06-25	MLS	Conf. call with R. Paul and G. Munroe re UCL nationwide class option and amending complaint (contract claims)	0.8	\$800	\$ 640.00
2019-06-25	GAM	Call with MLS and R. Paul re potential areas for amendment of contract claim, proving economic damages for non-Cal plaintiffs.	0.9	\$720	\$ 648.00
2019-07-03	MLS	Meet R. Paul to discuss motion to amend; draft agenda for conf. call; tel. call G. Munroe re motion to amend	2	\$800	\$ 1,600.00
2019-07-03	GAM	Call with MLS re hearing and amending complaint; prepare detailed list of allegations to add and areas to explore to beef up contract claims	2.4	\$720	\$ 1,728.00
2019-07-05	LPL	E-mail and call with J. Bloomfield re: research topics for preparing amended contract claim	0.3	\$465	\$ 139.50
2019-07-05	LCF	Participate in call with co-counsel regarding case management and next steps, including analyze status of plaintiffs' depositions and results of the same, outline tasks and strategy to draft and finalize Motion for Leave to file Second Amended Class Action Complaint	0.5	\$425	\$ 212.50
2019-07-05	LPL	Conference call with team re: approach for preparing proposed second amended complaint, and next steps in discovery	0.6	\$465	\$ 279.00
2019-07-05	MLS	Conf. call re amending complaint and discovery issues	0.7	\$800	\$ 560.00
2019-07-05	RMP	Work on Amended Complaint	1	\$725	\$ 725.00
2019-07-08	EHG	Confer with MLS re amending complaint, class cert approach; Confer with MLS and Rick Paul re amending complaint and re staffing assignments	0.5	\$910	\$ 455.00

2019-07-08	GRB	Meeting with supervising attorney to discuss needed research to incorporate into Second Amended Complaint	0.5	\$275	\$ 137.50
2019-07-08	LPL	Confer with M. Schrag and A. Mura re: potential class cert issues and amended complaint	0.7	\$465	\$ 325.50
2019-07-08	LPL	Confer with M. Schrag and J. Bloomfield re: plan for preparing motion to amend and proposed amended complaint	0.7	\$465	\$ 325.50
2019-07-08	LCF	Assist with Second Amended Complaint to include specific allegations for additional plaintiffs, including outline proposed template facts to obtain from each client and send draft of the same to the team	0.9	\$425	\$ 382.50
2019-07-08	LPL	Research on legislative history of HAMP for amending our breach of contract claim	0.9	\$465	\$ 418.50
2019-07-09	MLS	Conf. call Team re amending complaint; emails re same; review research re contract claim; review documents	1.2	\$800	\$ 960.00
2019-07-09	RMP	Work on Second Amended Complaint	2	\$725	\$ 1,450.00
2019-07-09	LPL	Begin drafting motion for leave to file second amended complaint	2.2	\$465	\$ 1,023.00
2019-07-09	LPL	Research on legislative history re: HAMP/FHA/GSE intentions for their mortgage modification requirements; e-mails with team re: same	4.1	\$465	\$ 1,906.50
2019-07-09	GRB	Research HAMP components for Second Amended Complaint	7.8	\$275	\$ 2,145.00

2019-07-09	LCF	Continue to work on proposed Second Amended Complaint, including begin to research, analyze, and outline thoughts regarding relevant case law on breach of contract, negligence, and fraud claims, analyze Judge Alsup's Order granting, in part, motion to dismiss and specific factual deficiencies from the same, and begin to revise draft negligence claim; correspond with team regarding specific pleading questions and strategize regarding additional claims	8.6	\$425	\$ 3,655.00
2019-07-10	LPL	E-mails with J. Bloomfield and co-counsel re: amendments to include in proposed second amended complaint	0.4	\$465	\$ 186.00
2019-07-10	LPL	Review and analyze co-counsel's draft of proposed second amended complaint	0.4	\$465	\$ 186.00
2019-07-10	LPL	Calls with M. Schrag re: status of motion to amend for leave to file second amended complaint, and draft proposed complaint	0.5	\$465	\$ 232.50
2019-07-10	LPL	Confer with A. Mura and J. Bloomfield re: potential ways to amend Plaintiffs' breach of contract claim	0.9	\$465	\$ 418.50
2019-07-10	AGS	Work on Second Amended Complaint	1	\$575	\$ 575.00
2019-07-10	RMP	Work on Second Amended Complaint	1	\$725	\$ 725.00
2019-07-10	MLS	Conf. L. Lam re motion to amend and proposed SAC; emails re same; review draft motion	1.5	\$800	\$ 1,200.00
2019-07-10	LPL	Draft motion for leave to file second amended complaint	6.5	\$465	\$ 3,022.50

2019-07-10	LCF	Continue to work on proposed Second Amended Complaint, including continue to revise draft negligence claim and breach of contract, as well as begin to draft fraud by omission claim; review and edit fact section for named plaintiffs represented at their depositions, including review relevant documents to determine whether factual changes needed; circulate revised draft to team for further review and edits	7.8	\$425	\$ 3,315.00
2019-07-11	AMM	Call with L. Lam and M. Schrag re second amended complaint	0.3	\$720	\$ 216.00
2019-07-11	AMM	Confer with L. Lam re edits to draft second amended complaint	0.5	\$720	\$ 360.00
2019-07-11	RMP	Work on Second Amended Complaint	1.4	\$725	\$ 1,015.00
2019-07-11	LPL	Confer with A. Mura, M. Schrag, and co-counsel re: whether to plead certain causes of action in the proposed second amended complaint	2.2	\$465	\$ 1,023.00
2019-07-11	AMM	Review Rule 12b order for amendments to pleading; research potential bases to allege failure to offer modification is a contractual breach	2.4	\$720	\$ 1,728.00
2019-07-11	LPL	Edit and finalize Plaintiffs' motion for leave to amend to file second amended complaint	2.5	\$465	\$ 1,162.50
2019-07-11	LPL	Prepare administrative motion to file proposed second amended complaint under seal, and supporting documents; oversee filing pursuant to local rules	2.7	\$465	\$ 1,255.50
2019-07-11	MLS	Work on motion to amend complaint; review emails and conf. calls L. Lam, L. Fellows, A. Mura and R. Paul re motion to amend and how to plead fraud/misrep claims in SAC	3.8	\$800	\$ 3,040.00
2019-07-11	LPL	Edit and finalize Plaintiffs' proposed amended complaint	4.4	\$465	\$ 2,046.00

2019-07-11	LCF	Finalize Second Amended Complaint, including review, analyze, and incorporate edits from Mr. Bloomfield and Ms. Lam; draft claim for negligent misrepresentation and analyze scope of the proposed class for the same; revise draft claim for fraud by omission and analyze scope of proposed class for the same; locate, analyze, and outline thoughts regarding various loan modification application denial letters named plaintiffs received and circulate thoughts regarding impact of the same on draft Second Amended Complaint; proofread and edit near-final draft and circulate revised draft to team; assist with finalizing Motion for Leave to Amend to File Second Amended Complaint, including draft proposed Order granting leave; and review, analyze, and provide feedback regarding draft Motion and Mr. Schrag's proposed edits to the same	9.1	\$425	\$ 3,867.50
2019-07-15	LCF	Analyze next steps to "unseal" Second Amended Complaint, including outline potential options and timing for the same	0.4	\$425	\$ 170.00
2019-07-15	LPL	Confer with M. Schrag and A. Blumenthal re: moving to unseal and Local Rule 79-5(e); conference call with M. Schrag and co-counsel re: same	0.5	\$465	\$ 232.50
2019-07-15	MLS	Conf. L. Lam and A. Blumenthal re motion to seal; conf. call Team re same;	0.5	\$800	\$ 400.00
2019-07-16	LPL	Prepare notice of withdrawal of administrative motion and filing of unredacted version of motion for leave to amend	0.9	\$465	\$ 418.50
2019-07-17	LPL	E-mails with defense counsel re: briefing schedule on motion to amend complaint	0.2	\$465	\$ 93.00

2019-07-18	LPL	Edits to stipulation to extend briefing schedule on Plaintiffs' motion to amend; confer with M. Schrag re: same	0.4	\$465	\$ 186.00
2019-07-29	JJB	Review and analyze Wells Fargo's opposition to motion for leave to file second amended complaint	1.3	\$580	\$ 754.00
2019-07-29	JJB	Prepare, review and file redlined version of proposed second amended complaint	1.4	\$580	\$ 812.00
2019-07-30	JJB	Discuss with M. Schrag reply to Wells Fargo's opposition to motion for leave to file second amended complaint	0.3	\$580	\$ 174.00
2019-07-30	MLS	Review Motion to Amend Opp. and conf. J. Bloomfield re reply	1.7	\$800	\$ 1,360.00
2019-07-30	JJB	Preliminary research re reply to Wells Fargo's opposition to motion for leave to file second amended complaint	3.1	\$580	\$ 1,798.00
2019-07-31	JJB	Research and drafting of reply to Wells Fargo's opposition to motion for leave to file second amended complaint	3.6	\$580	\$ 2,088.00
2019-08-01	MLS	Conf. with J. Bloomfield re mot. to amend	0.5	\$800	\$ 400.00
2019-08-01	JJB	Research and drafting of reply to Wells Fargo's opposition to motion for leave to file second amended complaint	3.2	\$580	\$ 1,856.00
2019-08-02	JJB	Research and drafting of reply brief in support of motion for leave to file second amended complaint	3.9	\$580	\$ 2,262.00
2019-08-03	MLS	Review/edit motion to amend reply brief	1.8	\$800	\$ 1,440.00
2019-08-04	JJB	Emails with M. Schrag re reply brief in support of motion for leave to file second amended complaint	0.3	\$580	\$ 174.00
2019-08-04	MLS	Work on reply brief on motion to amend	2	\$800	\$ 1,600.00
2019-08-04	JJB	Finalize and circulate draft reply brief in support of motion for leave to file second amended complaint	5.1	\$580	\$ 2,958.00
2019-08-05	AMM	Email proposing edits to draft reply brief ISO motion for leave to file SAC	0.3	\$720	\$ 216.00
2019-08-05	JJB	Emails with co-counsel re reply brief in support of motion for leave to file second amended complaint	0.4	\$580	\$ 232.00

2019-08-05	LCF	Assist with finalizing Reply in Support of Motion for Leave to File Second Amended Complaint, including review revised draft from Mr. Bloomfield and provide feedback to the same; as well as analyze specific factual questions and edits to Reply with Mr. Paul	0.8	\$425	\$ 340.00
2019-08-05	RMP	Review and analyze opposition to motion for leave to amend; draft reply in support of motion for leave to amend	1.5	\$725	\$ 1,087.50
2019-08-05	MLS	Work on reply brief on Motion to Amend	2.8	\$800	\$ 2,240.00
2019-08-05	JJB	Finalize and coordinate filing of reply brief in support of motion for leave to file second amended complaint	4.4	\$580	\$ 2,552.00
2019-08-19	LCF	Review and analyze Court's Order regarding Leave to File Second Amended Complaint	0.3	\$425	\$ 127.50
2019-08-19	MLS	Review order on Motion to Amend; emails re same	0.5	\$800	\$ 400.00
2019-08-20	RMP	Review and analyze order on motion for leave to amend	0.2	\$725	\$ 145.00
2019-08-20	MLS	Tel. call and emails E. gibbs re motion to amend order and class cert brief; emails L. Lam re same; review order; emails R. Paul re same	0.7	\$800	\$ 560.00
2019-08-20	LPL	Prepare second amended complaint pursuant to the Court's order on Plaintiffs' motion for leave to amend	1	\$465	\$ 465.00
2019-08-22	LPL	Further edits to second amended complaint; call with M. Schrag and e-mails with team re: same	0.7	\$465	\$ 325.50
2019-08-26	JJB	Review and revise final draft of second amended complaint prior to filing	1.7	\$580	\$ 986.00
		Project Total:	135.4		\$ 74,430.50
Project: Research and analyze class representatives' bankruptcies and their effect on the case					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-02-28	AGS	Call with J. Jeppson regarding bankruptcy issues pertaining to class representatives; strategy call	0.3	\$575	\$ 172.50

2019-03-01	LCF	Begin to work on next steps in light of filing First Amended Complaint, including begin to draft process by which to research any bankruptcy filings for clients and then analyze potential impact of same for clients	0.4	\$425	\$ 170.00
2019-03-08	LLD	Communications with attorney regarding research of bankruptcy project	0.4	\$240	\$ 96.00
2019-03-08	LCF	Continue to work on bankruptcy searches for clients, including finalize instructions/process for the same, meet with Ms. Davis to review procedure to conduct searches	0.8	\$425	\$ 340.00
2019-03-11	LCF	Continue to work on bankruptcy filing searches, outline thoughts regarding specific search issues and confirming relevant schedules located	0.1	\$425	\$ 42.50
2019-03-11	LLD	Research regarding possible bankruptcy	0.9	\$240	\$ 216.00
2019-03-14	LCF	Continue to work on bankruptcy searches, including analyze specific questions and additional searches	0.2	\$425	\$ 85.00
2019-03-27	LCF	Review initial results of bankruptcy searches for named plaintiffs and analyze next steps	0.1	\$425	\$ 42.50
2019-03-27	AGS	Travel to San Francisco from Kansas City for Case Management Conference (extended due to weather delays in Minneapolis); analyze bankruptcy status for class representatives and whether we need to reach out to trustees and/or reopen the estates for those that have prior bankruptcies	2.5	\$575	\$ 1,437.50
2019-03-28	LCF	Receive update from Ms. Davis regarding status of bankruptcy searches	0.1	\$425	\$ 42.50
2019-04-01	AGS	Research on bankruptcies for class representatives and individual clients	0.6	\$575	\$ 345.00
2019-04-03	LCF	Receive update from Ms. Davis regarding status of bankruptcy searches, correspond regarding timing to finish	0.1	\$425	\$ 42.50

2019-04-10	LCF	Continue to work on bankruptcy searches, including review update from Ms. Davis that initial search complete, review the same, analyze process by which to review/analyze information and next steps	0.2	\$425	\$ 85.00
2019-04-10	LCF	Correspond with Ms. Floyd regarding prior bankruptcy filing, confirm information correct, outline thoughts and potential next steps to contact trustee	0.4	\$425	\$ 170.00
2019-04-11	JJB	Email to co-counsel re class representatives' bankruptcy status	0.2	\$580	\$ 116.00
2019-04-11	AGS	Review information regarding class representatives with bankruptcies and analyze next steps	0.3	\$575	\$ 172.50
2019-04-11	JJB	Calls to class representatives re bankruptcy status	0.4	\$580	\$ 232.00
2019-04-11	LCF	Continue to analyze bankruptcy searches and potential filings, review final results from Ms. Davis, analyze the same, outline thoughts and additional questions regarding searches	1.1	\$425	\$ 467.50
2019-04-15	AGS	Analyze bankruptcy information for class representatives; draft memorandum regarding same	0.4	\$575	\$ 230.00
2019-08-13	LCF	Preliminarily review Wells Fargo's First Supplemental Interrogatory responses and outline thoughts regarding the same; continue to research potential bankruptcy issues for named plaintiffs in light of date of error identified by Wells Fargo, including review interrogatory responses for named plaintiffs and locate additional bankruptcy filings, conduct second search of bankruptcy dockets on Public Access to Court Electronic Records, outline thoughts regarding named plaintiffs and potential need to contact bankruptcy trustee; analyze thoughts with Mr. Paul, and draft summary of thoughts and potential next steps for team	2.5	\$425	\$ 1,062.50

2019-08-14	LCF	Continue to work on obtaining contacting/obtaining consent to move forward from bankruptcy trustee for Ms. Teague, Ms. White, and Mr. and Mrs. Floyd, including review follow-up correspondence from Ms. Lam regarding Ms. White's bankruptcy, review prior correspondence sent to bankruptcy trustees and draft proposed, template letter to be sent; review and analyze edits received from Mr. Paul	1	\$425	\$ 425.00
2019-08-15	LCF	Continue to analyze questions regarding named plaintiffs as class representatives, including draft follow-up correspondence to team regarding next steps and reaching out to other plaintiffs regarding contacting bankruptcy trustee	0.2	\$425	\$ 85.00
2019-08-15	LPL	Work on getting permission from named plaintiff Emma White's bankruptcy trustee to pursue the case	0.4	\$465	\$ 186.00
2019-08-16	RPN	Draft letters to trustees of client bankruptcy claims in order to ascertain if claim is property of the estate	0.4	\$230	\$ 92.00
2019-08-16	LCF	Continue to work on question regarding bankruptcy filed by Mr. and Mrs. Floyd, Ms. White, and Ms. Teague, including research current contact information for bankruptcy trustee, finish body of letters for each plaintiff, send letters to Mr. Neal to format and finalize; review letter for Mr. and Mrs. Floyd and instruct Mr. Neal to send to trustee; correspond with Ms. Lam regarding contacting Ms. White to get permission to contact bankruptcy trustee and next steps	0.7	\$425	\$ 297.50
2019-08-18	LPL	Call with named plaintiff Emma White to ask for her permission to contact her bankruptcy trustee and to give her an update on the case	0.3	\$465	\$ 139.50

2019-08-19	LPL	Send letter to client Emma White's bankruptcy trustee to obtain permission to pursue the present claims on the trustee's behalf	0.2	\$465	\$	93.00
2019-08-20	LCF	Continue to work on clearing potential bankruptcy issues for named plaintiffs, including documenting status of efforts to contact trustees and remaining trustee to be contacted; draft summary of status for file	0.2	\$425	\$	85.00
2019-08-22	RPN	Draft response to questions from the trustee of the Floyds' estate	0.7	\$230	\$	161.00
2019-09-03	LCF	Review status of reaching out to bankruptcy trustee regarding potential claim on behalf of Ms. White and Ms. Teague, correspond with Mr. Bloomfield and Ms. Lam to request update regarding the same; revise and send draft letter to bankruptcy trustee for Mr. Bloomfield to forward on	0.2	\$425	\$	85.00
2019-09-03	LPL	E-mails with co-counsel re: getting in touch with named plaintiff Emma White's bankruptcy trustee to ask for her permission to pursue Ms. White's claims; follow-up e-mail to trustee	0.2	\$465	\$	93.00
2019-09-03	LCF	Continue to analyze bankruptcy question and re-opening of bankruptcy estate for George and Cyndi Floyd, including attempt to reach Ms. Floyd to discuss and leave message; and speak with Ms. Floyds regarding bankruptcy re-opening and leave message, outline notes from call for file	0.6	\$425	\$	255.00
2019-09-06	JJB	Draft letter to C. Teague's bankruptcy trustee	0.6	\$580	\$	348.00
2019-09-11	LPL	Call to Emma White's bankruptcy trustee to ask her about permission to bring this case on the trustee's behalf	0.2	\$465	\$	93.00
2019-09-11	JJB	Emails with Coszetta Teague re bankruptcy trustee issue	0.3	\$580	\$	174.00
2019-09-12	LPL	Follow up with Plaintiff Emma White's bankruptcy trustee on whether we have permission to pursue the claims on Ms. White's behalf	0.2	\$465	\$	93.00

2019-09-12	JJB	Emails with co-counsel re bankruptcy trustee issues	0.4	\$580	\$	232.00
2019-09-13	LCF	Continue to work on potential question regarding bankruptcy for Ms. Teague, including outline facts of her bankruptcy filing and date of error, and send proposed response to bankruptcy trustee to Mr. Bloomfield	0.2	\$425	\$	85.00
2019-09-16	LPL	E-mails and call to Ms. White's bankruptcy trustee to ask whether our claims are the property of the bankruptcy estate	0.3	\$465	\$	139.50
2019-09-17	LPL	Call and e-mails with client Emma White to discuss reaching out to her bankruptcy trustee for permission to pursue claims on her behalf	0.4	\$465	\$	186.00
2019-10-04	LCF	Review correspondence from bankruptcy trustee regarding her receiving follow-up correspondence from her counsel to seek appointment to represent Ms. Floyd and Mr. Floyd through bankruptcy, forward same to Mr. and Mrs. Floyd, draft response to bankruptcy trustee regarding bankruptcy	0.2	\$425	\$	85.00
2019-10-10	LCF	Correspond with counsel for the bankruptcy trustee for Mr. and Mrs. Floyd, including review follow-up correspondence from him	0.2	\$425	\$	85.00
2019-10-11	LCF	Continue to work on bankruptcy issue for named plaintiffs, Mr. and Mrs. Floyd, including draft response to counsel for the bankruptcy trustee sending representation agreement with Mr. and Mrs. Floyd and confirming desire to be appointed counsel for them in the bankruptcy	0.1	\$425	\$	42.50
2019-10-24	LCF	Continue to work on appointment in bankruptcy as counsel for Mr. and Mrs. Floyd, including continue to discuss finalizing declaration with Ms. Lam and next steps, finalize and send signed declaration and correspond with bankruptcy trustee's counsel	0.2	\$425	\$	85.00

2019-10-29	LCF	Continue to work on appointment as counsel in bankruptcy for Mr. and Mrs. Floyd, including call with counsel for the trustee to confirm next steps	0.2	\$425	\$ 85.00
2019-11-01	LCF	Continue to work on questions regarding bankruptcy, including review correspondence from Mr. Bloomfield regarding appointment as bankruptcy counsel for Ms. Teague; outline thoughts and questions regarding revisions to proposed declaration	0.2	\$425	\$ 85.00
2019-11-26	LCF	Continue to work on filing request to be appointed as counsel for the bankruptcy trustee for George and Cyndi Floyd, including send final application for appointment to counsel for the bankruptcy trustee	0.2	\$425	\$ 85.00
2019-12-09	LCF	Review Order from the court appointing Mr. Paul and Mr. Schrag as counsel for George and Cyndi Floyd through the bankruptcy court	0.1	\$425	\$ 42.50
2020-01-08	JJB	Emails with K. Goodman (bankruptcy trustee for client C. Teague)	0.4	\$580	\$ 232.00
2020-02-21	JJB	Emails with client C. Teague's bankruptcy trustee	0.3	\$580	\$ 174.00
2020-05-06	LCF	Review voicemail from counsel for Mr. and Mrs. Floyd's bankruptcy trustee, Mr. Seitzer, return call and leave message; correspond with Mr. Seitzer regarding settlement and next steps	0.2	\$425	\$ 85.00
		Project Total:	22		\$ 10,001.00
Project: Renewed motion for class certification					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-10-31	LPL	E-mails with M. Schrag re: preparing certain materials for hearing on motion for class certification	0.3	\$465	\$ 139.50
2019-10-31	MLS	Review and analyze court order re certifying CA class; tel. call with R. Paul and E. Gibbs re same; emails re same;	1.5	\$800	\$ 1,200.00

2019-11-01	MLS	Conf. with J. Bloomfield and L. Lam re CA clients; draft outline of brief re CA only class; conf. with E. Gibbs and A. Mura re same; tel. calls with R. Paul re same; conf. call with E. Gibbs, R. Paul and A. Mura re CA only class cert brief; review CIT chart re CA class members; emails with Team re same; emails with C. Rosler re damages for CA class members	3.7	\$800	\$ 2,960.00
2019-11-01	LPL	Legal research on "test case" approaches to include in Plaintiffs' memorandum on certifying a CA class; confer with M. Schrag re: same	4.9	\$465	\$ 2,278.50
2019-11-02	MLS	Work on brief re certifying CA only class; emails re same	3.2	\$800	\$ 2,560.00
2019-11-02	LPL	Draft and edit Plaintiffs' memorandum on moving to certify a California class; legal research for the same	5.4	\$465	\$ 2,511.00
2019-11-03	LPL	E-mail to J. Bloomfield and co-counsel L. Fellows re: reaching out to CA clients who have FHA contracts to gauge their interest in being a class representative	0.2	\$465	\$ 93.00
2019-11-03	LPL	Conf. call with team re: Plaintiffs' response to Judge Alsup's order on class certification (and possible CA-only class)	0.8	\$465	\$ 372.00
2019-11-03	NS	Cite checking class cert memo	2.8	\$415	\$ 1,162.00
2019-11-03	MLS	Work on brief re CA only class; prep for class cert hearing read HUD regs and cases	6	\$800	\$ 4,800.00
2019-11-04	LPL	E-mails with team re: reaching out to CA clients who have FHA contracts to see if they'd be interested in being a class representative	0.2	\$465	\$ 93.00
2019-11-04	LPL	Review and analyze Wells Fargo's response to the Court's order on class certification; confer with M. Schrag re: same	0.4	\$465	\$ 186.00
2019-11-04	LPL	Confer with M. Schrag re: next steps on drafting a new motion to certify a California-only liability class	0.4	\$465	\$ 186.00

2019-11-04	RMP	Draft supplemental memorandum regarding class certification	0.4	\$725	\$ 290.00
2019-11-04	LPL	Edit and finalize Plaintiffs' response to Judge Alsup's order on moving to certify a CA-only class	3.2	\$465	\$ 1,488.00
2019-11-04	CNR	Continue nationwide damages research. Focusing now on California claims for possible early subclass; draft short memo re same	4.1	\$680	\$ 2,788.00
2019-11-04	MLS	Work on brief re CA only class; review WF brief re same; conf. with L. Lam re same; prep for class cert hearing	5.7	\$800	\$ 4,560.00
2019-11-05	LPL	Work with M. Schrag to prep for hearing on motion for class cert; legal research for the same	5.3	\$465	\$ 2,464.50
2019-11-05	MLS	Prep for class cert hearing; review cases; legal research re UCL restitution; work on outline; conf. with L. Lam and J. Bloomfield	8.5	\$800	\$ 6,800.00
2019-11-06	NS	Reviewing court order: denying class cert without prejudice	0.1	\$415	\$ 41.50
2019-11-06	LPL	E-mail to M. Schrag re: tasks for new class cert motion, damages expert reports, and reviewing privilege log	0.3	\$465	\$ 139.50
2019-11-06	LPL	Confer with M. Schrag and E. Gibbs re: hearing on motion for class certification	0.3	\$465	\$ 139.50
2019-11-06	LPL	Begin drafting outline for new motion for class certification; confer with M. Schrag re: same	3.5	\$465	\$ 1,627.50
2019-11-06	MLS	Prep for class cert hearing; meet R. Paul and A. Schwartz; Class Cert Hearing; meeting w/Team after Hearing; conf. call with damages expert; meet with L. Lam re revised class cert. brief	5.5	\$800	\$ 4,400.00
2019-11-06	RMP	Analyze strategy for renewed class certification briefing	6	\$725	\$ 4,350.00
2019-11-07	LPL	E-mails with team re: new class certification briefing schedule	0.2	\$465	\$ 93.00
2019-11-07	RMP	Work on renewed class certification briefing	0.2	\$725	\$ 145.00

2019-11-07	LPL	Draft Plaintiffs' new motion for class certification	6.4	\$465	\$ 2,976.00
2019-11-08	RMP	Draft renewed motion for class certification	1.5	\$725	\$ 1,087.50
2019-11-08	LPL	Continue drafting California class section of Plaintiffs' renewed motion for class certification	8.4	\$465	\$ 3,906.00
2019-11-09	MLS	Work on class cert brief	4	\$800	\$ 3,200.00
2019-11-10	MLS	Emails re mediation privilege and producing new class member spreadsheet	0.3	\$800	\$ 240.00
2019-11-10	MLS	Work on class cert. motion	1	\$800	\$ 800.00
2019-11-10	LPL	Continue drafting Plaintiffs' renewed motion for class certification; review and analyze M. Schrag's edits	7.1	\$465	\$ 3,301.50
2019-11-11	JJB	Call with co-counsel re class certification motion	0.5	\$580	\$ 290.00
2019-11-11	LPL	Conf. call with team re: Plaintiffs' motion for class certification, upcoming depositions, and expert reports	0.5	\$465	\$ 232.50
2019-11-11	LPL	Call with M. Schrag re: draft of Plaintiffs' renewed motion for class certification	0.5	\$465	\$ 232.50
2019-11-11	LCF	Correspond with team regarding upcoming, renewed class certification briefing, outline thoughts regarding the same, including thoughts regarding additional research and drafting as well as other outstanding discovery tasks	0.7	\$425	\$ 297.50
2019-11-11	NS	Researching case law re: class cert of state law claims and abeyance.	0.8	\$415	\$ 332.00
2019-11-11	RMP	Analyze class certification strategies	0.9	\$725	\$ 652.50
2019-11-11	MLS	Work on class cert motion; conf. call with Team re class cert, experts, and discovery; tel. call with L. Lam re class cert	5.5	\$800	\$ 4,400.00
2019-11-11	LPL	Continue drafting Plaintiffs' renewed motion for class certification	7.1	\$465	\$ 3,301.50
2019-11-12	LPL	E-mails with A. Mura and E. Gibbs re: edits to Plaintiffs' motion for class certification	0.3	\$465	\$ 139.50

2019-11-12	LPL	Confer and e-mails with co-counsel re: getting a 50-state survey on "extreme and outrageous" conduct and contract law	0.4	\$465	\$ 186.00
2019-11-12	LPL	Calls with M. Schrag re: plan for motion for class certification, and gathering evidence for Dan Salah's damages analysis	0.5	\$465	\$ 232.50
2019-11-12	LCF	Continue to work on draft of Amended Motion for Class Certification, including finish initial draft update of the fact section to add additional information learned since initial draft; circulate updated facts to the team; correspond with Ms. Lam regarding status of draft Amended motion, tasks to be completed, and next steps	1.6	\$425	\$ 680.00
2019-11-12	MLS	Work on class cert brief; tel. calls with L. Lam re same	1.7	\$800	\$ 1,360.00
2019-11-12	LPL	Legal research re: whether we can add a class representative who is not named in the complaint; e-mail to team re: same	2.4	\$465	\$ 1,116.00
2019-11-12	LPL	Continue drafting/editing Plaintiffs' renewed motion for class certification	2.7	\$465	\$ 1,255.50
2019-11-13	LCF	Continue to work on Amended Motion for Class Certification, including analyze question regarding whether to add Federal Housing Administration class representative, review and analyze research from Ms. Lam regarding mechanism by which to add representative, and correspond with team regarding setting time to further discuss	0.2	\$425	\$ 85.00
2019-11-13	LPL	E-mails with co-counsel L. Fellows and team re: various outstanding tasks for class certification motion	0.4	\$465	\$ 186.00
2019-11-13	LCF	Continue to work on renewed draft trial plan, including continue to outline thoughts regarding how to explain each proposed class and alternative proposals	0.7	\$425	\$ 297.50

2019-11-13	LPL	Calls with M. Schrag re: class certification motion and getting information on damages for Dan Salah	0.7	\$465	\$ 325.50
2019-11-13	JJB	Conference call with co-counsel re class cert brief and motion to amend	0.9	\$580	\$ 522.00
2019-11-13	LPL	Conf. call with team re: class certification motion and expert report on damages	0.9	\$465	\$ 418.50
2019-11-13	RPN	Prepare exhibits for renewed class certification brief	0.9	\$230	\$ 207.00
2019-11-13	LCF	Continue to work on Renewed Motion for Class Certification, including continue to analyze question regarding admissibility of extrinsic evidence; preliminary meet with Mr. Leyh to outline preliminary thoughts and instruct him regarding drafting fifty state survey regarding how states handle extrinsic evidence and contractual ambiguities; and follow-up analysis with Mr. Leyh regarding initial research and whether additional questions should be added to the survey; begin to review and outline thoughts/questions regarding revised draft brief in preparation for call with team; call with team regarding draft, including receive substantive feedback from Mr. Mura regarding changes needed, as well as analyze Federal Housing Administration representation question, outline thoughts regarding how to proceed with next steps to finalize brief and overall strategy	1.4	\$425	\$ 595.00
2019-11-13	MLS	Work on class cert brief; conf. call with Team re class cert brief and motion to Amend	2.7	\$800	\$ 2,160.00
2019-11-13	LPL	Work on 50-state survey on how states define "extreme and outrageous" conduct for class certification motion	2.9	\$465	\$ 1,348.50

2019-11-13	NRL	Reviewed email from co-counsel concerning need for research on fifty state survey over contract interpretation and extrinsic evidence; met with associate to discuss legal arguments and positions asserted in class cert motion and how to structure survey, associate also brought attention to potentially problematic cases and asked me to investigate; began searching on Westlaw for cases and shepardized cases; reviewed Ellsworth case and reviewed plaintiffs and defendant's fifty state survey chart; continued researching various fifty state surveys and researching secondary source materials on state variations in parole evidence and extrinsic evidence rules	5.8	\$275	\$ 1,595.00
2019-11-14	LPL	Confer with M. Schrag on plan for editing renewed motion for class certification and motion to amend to add FHA plaintiff	0.4	\$465	\$ 186.00
2019-11-14	RPN	Prepare exhibits for renewed class certification brief	0.6	\$230	\$ 138.00
2019-11-14	LCF	Continue to work on Renewed Motion for Class Certification, including continue to analyze question regarding admissibility of extrinsic evidence, receive update from Mr. Leyh regarding his work on fifty state survey regarding how states handle extrinsic evidence and contractual ambiguities; analyze similar cases and how ambiguity question was resolved, outline thoughts regarding the same, and correspond with Ms. Lam and Mr. Schrag to propose strategy for presenting ambiguity question in light of research; continue to work on draft of renewed trial plan	4.2	\$425	\$ 1,785.00
2019-11-14	LPL	Continue editing/drafting Plaintiffs' renewed motion for class certification	5	\$465	\$ 2,325.00

2019-11-14	NRL	Continued reading secondary sources and various fifty state surveys to help construct a fifty state survey for Wells Fargo; met with associate to discuss status and next steps; began building case citations in word documents to send to associate for approval later today	7.1	\$275	\$ 1,952.50
2019-11-14	MLS	Work on class cert brief; conf. with L. Lam re causation and contract issues; tel. calls with L. Fellows re national class issues	7.5	\$800	\$ 6,000.00
2019-11-14	NS	Generating 50 state survey re: IIED.	7.7	\$415	\$ 3,195.50
2019-11-15	RMP	Work on class certification brief	0.2	\$725	\$ 145.00
2019-11-15	LCF	Continue to work on Renewed Motion for Class Certification, including continue to work on revised trial plan and drafting the same, review and send update to team regarding status of overlapping Washington case and Wells Fargo's motion to stay, review third party documents for Ms. Granja and circulate thoughts to team regarding same to the extent documents impact class certification briefing, locate and send relevant documents needed to add to class certification fact section and outline summary of documents for Mr. Schrag and Ms. Lam	5.7	\$425	\$ 2,422.50
2019-11-15	MLS	Tel. call with E. Gibbs re class cert brief; work on class cert. brief.; conf. with L. Lam re same; review C. Rosler memo on remedies	6.2	\$800	\$ 4,960.00
2019-11-15	NRL	Continued researching state law for fifty state survey; sent email with finalized work and breakdown of information to associate; continued researching states for ambiguity relating to form contracts and critiquing Wells Fargo chart; met with associate to discuss final chart and work over the weekend	7	\$275	\$ 1,925.00

2019-11-15	LPL	Continue editing and drafting Plaintiffs' renewed motion for class certification; confer with M. Schrag re: same	9.2	\$465	\$ 4,278.00
2019-11-16	LPL	E-mail to defense counsel re: exhibits to be filed under seal with Plaintiffs' renewed motion for class certification	0.3	\$465	\$ 139.50
2019-11-16	LPL	Draft part of nationwide breach of contract section for Plaintiffs' renewed motion for class certification	0.8	\$465	\$ 372.00
2019-11-16	LPL	Calls and e-mails with M. Schrag and co-counsel re: edits to Plaintiffs' motion for class certification and moving to amend to add FHA class rep	0.8	\$465	\$ 372.00
2019-11-16	RMP	Work on motion for class certification briefing	0.8	\$725	\$ 580.00
2019-11-16	LCF	Continue to work on renewed trial plan, including finish initial draft section regarding California Class and follow-on proceedings, and circulate draft along with thoughts and questions for further analysis and feedback; continue to analyze question regarding admission of extrinsic evidence, including continue work on fifty state survey regarding admission of extrinsic evidence, begin to analyze final draft survey from Mr. Leyh and outline thoughts and additional questions regarding the same, and review and analyze Wells Fargo's prior draft survey and outline thoughts regarding whether any further follow-up needed in response	7.4	\$425	\$ 3,145.00
2019-11-17	LPL	Review and analyze A. Mura's edits to draft motion for class certification	0.4	\$465	\$ 186.00
2019-11-17	LPL	Team call re: edits and additions to Plaintiffs' renewed motion for class certification	0.5	\$465	\$ 232.50
2019-11-17	NS	Reviewing potential jury instructions and proposed trial plan drafts	0.5	\$415	\$ 207.50
2019-11-17	LPL	E-mails with M. Schrag re: citations to include in Plaintiffs' renewed motion for class certification	0.6	\$465	\$ 279.00

2019-11-17	LPL	Draft issue certification section for Plaintiffs' renewed motion for class certification	0.9	\$465	\$ 418.50
2019-11-17	LCF	Continue to work on Amended Motion for Class Certification, including review and begin to analyze revised draft of Motion; correspond with team to continue to analyze certification strategy and changes to motion, as well as revised trial plan; continue to review fifty state survey regarding extrinsic evidence and outline changes/edits to the same	1.3	\$425	\$ 552.50
2019-11-17	RMP	Draft Trial Plan	1.9	\$725	\$ 1,377.50
2019-11-17	MLS	Work on Trial Plan and Class Cert brief; emails re same; conf. call with Team re same	5.7	\$800	\$ 4,560.00
2019-11-18	NS	Discussion with L. Lam re: IIED 50 state survey	0.1	\$415	\$ 41.50
2019-11-18	LPL	E-mails and confer with N. Shah re: pulling excerpts from named plaintiffs' depositions to show adequacy in support of motion for class certification	0.4	\$465	\$ 186.00
2019-11-18	LCF	Continue to work on amended motion for class certification, including review and analyze revised fifty state survey regarding extrinsic evidence from Mr. Leyh, provide edits and changes to draft, and instruct Mr. Leyh regarding finalizing chart	1.4	\$425	\$ 595.00
2019-11-18	NRL	Reviewed email concerning fifty state survey; reviewed edits and comments and made necessary changes; compared our chart to Wells Fargo's fifty state survey chart for differences and noted them in separate memorandum	2.4	\$275	\$ 660.00
2019-11-18	RMP	Draft trial plan; analyze damage issues	2.5	\$725	\$ 1,812.50
2019-11-18	NS	Locating deposition citations for class cert re-briefing	5	\$415	\$ 2,075.00
2019-11-18	MLS	Work on class cert. motion and trial plan	6.5	\$800	\$ 5,200.00

2019-11-18	LPL	Continue drafting/editing Plaintiffs' renewed motion for class certification; confer with M. Schrag re: same	8.4	\$465	\$ 3,906.00
2019-11-19	RPN	Prepare exhibits for renewed class certification brief	0.2	\$230	\$ 46.00
2019-11-19	NS	Locating deposition citations for class cert re-briefing	0.3	\$415	\$ 124.50
2019-11-19	NS	Conducting Count of Class Members for Class Re-filing	0.5	\$415	\$ 207.50
2019-11-19	NS	Preparing class cert refiling exhibits	3	\$415	\$ 1,245.00
2019-11-19	EHG	Call with team re class certification brief, read, review, and edit draft, circulate same	3.1	\$910	\$ 2,821.00
2019-11-19	RMP	Draft renewed motion for class certification	3.6	\$725	\$ 2,610.00
2019-11-19	LCF	Continue to work on Renewed Motion for Class Certification, including continue to work on draft of the trial plan, review and incorporate additional edits from Mr. Paul, finalize revised draft and send to co-counsel for further review and edits; participate in call with team to continue to outline and analyze class certification preparations, conduct legal analysis regarding scope of certification and strategy of certification brief, and assign tasks to finalize briefing	4.7	\$425	\$ 1,997.50
2019-11-19	LPL	Work on editing brief supporting Plaintiffs' renewed motion for class certification	5.6	\$465	\$ 2,604.00
2019-11-19	LPL	Draft and edit declarations, prepare exhibits, and edit trial plan in support of Plaintiffs' renewed motion for class certification	5.6	\$465	\$ 2,604.00
2019-11-19	MLS	Work on motion for class cert and trial plans; conf. with Team re same	8.5	\$800	\$ 6,800.00
2019-11-20	EHG	Call with MLS and LPL re class certification arguments, strategy	0.3	\$910	\$ 273.00
2019-11-20	KDJ	Draft affidavit of R. Paul in support of renewed class certification motion	0.4	\$250	\$ 100.00
2019-11-20	NS	Preparing proposed order	0.6	\$415	\$ 249.00

2019-11-20	LCF	Continue to work on Renewed Motion for Class Certification, including continue to work on draft of the trial plan, analyze separate, nationwide trial plan and finalizing the same; as well as review and analyze questions regarding citations in the current draft motion and whether to add additional citations; correspond with team regarding the same	0.7	\$425	\$ 297.50
2019-11-20	AGS	Revise Trial Plan exhibit to Plaintiffs' Renewed Motion for Class Certification	1.1	\$575	\$ 632.50
2019-11-20	JJB	Review, analyze and revise Schrag declaration	1.1	\$580	\$ 638.00
2019-11-20	NS	Preparing exhibit 21	1.2	\$415	\$ 498.00
2019-11-20	JJB	Review, analyze and revise California and nationwide class trial plans	2.3	\$580	\$ 1,334.00
2019-11-20	RMP	Draft Trial Plans	5.5	\$725	\$ 3,987.50
2019-11-20	NS	Preparing class cert refiling exhibits	5.9	\$415	\$ 2,448.50
2019-11-20	JJB	Research and drafting of renewed motion for class certification	6.1	\$580	\$ 3,538.00
2019-11-20	NS	Legal citation checking and review of draft materials re: cert refiling and motion for leave to file amended comp	6.3	\$415	\$ 2,614.50
2019-11-20	NRL	Review research on trial plans in preparation for creation of trial plan; strategize over creation of trial plan; research case law where similar class claims under state consumer protection laws were certified; revise citations to declarations in trial plan; review case law cited to in renewed class certification motion and corresponding pleadings; revise legal citations in class certification motion	6.5	\$275	\$ 1,787.50
2019-11-20	MLS	Work on motion for class cert, trial plans, declarations; tel calls with R. Paul re same; conf. with E. Gibbs re same	14	\$800	\$ 11,200.00
2019-11-20	LPL	Further edits to motion for class certification, supporting declarations, and exhibits	16.6	\$465	\$ 7,719.00

2019-11-21	RPN	Finalize exhibits for renewed class certification brief	0.2	\$230	\$ 46.00
2019-11-21	NS	Reviewing draft trial plan	0.4	\$415	\$ 166.00
2019-11-21	RMP	Draft Trial Plan	1.5	\$725	\$ 1,087.50
2019-11-21	NS	Preparing exhibits for class cert motion	1.8	\$415	\$ 747.00
2019-11-21	JJB	Finalize documents in connection with filing of renewed motion for class certification	2.6	\$580	\$ 1,508.00
2019-11-21	LCF	Assist with finalizing Renewed Motion for Class Certification, including proofread/review, edit, and confirm citations in revised California Class trial plan and Nationwide Class trial plans, proofread and edit final draft of Renewed Motion for Class Certification, assist with locating relevant exhibits for the motion and analyzing edits, send final edits to Ms. Lam for finalizing and filing	3.8	\$425	\$ 1,615.00
2019-11-21	MLS	Finalize and file class cert, trial plan and declaration	4	\$800	\$ 3,200.00
2019-11-21	LPL	Review, edit, and finalize for filing Plaintiffs' renewed motion for class certification, with its supporting declarations and exhibits	4.6	\$465	\$ 2,139.00
2019-12-12	LPL	Review and analyze WF's opposition to Plaintiffs' renewed motion for class certification	0.6	\$465	\$ 279.00
2019-12-13	LPL	Draft outline for reply in support of renewed motion for class certification	0.6	\$465	\$ 279.00
2019-12-13	LPL	Confer with M. Schrag and A. Mura re: outline for Plaintiffs' reply in support of renewed motion for class certification	1.6	\$465	\$ 744.00
2019-12-13	CNR	Class-cert reply: Analyze then research and draft reply to WF's UCL-standing argument.	2.6	\$680	\$ 1,768.00
2019-12-13	LPL	Legal research re: propriety of certifying liability-only classes under Rule 23(b)(3)	4.2	\$465	\$ 1,953.00

2019-12-13	MLS	Work on class cert reply; review WF brief and trial plan response; conf. with L. Lam and J. Bloomfield re assignments; legal research; tel. calls with A. Mura and R. Paul re same; emails and tel. calls with C. Rosler re UCL standing section	5.5	\$800	\$ 4,400.00
2019-12-13	RMP	Review and analyze opposition to motion for class certification; work on issues for experts; return travel to Kansas City	5.7	\$725	\$ 4,132.50
2019-12-14	MLS	Work on class cert. reply	3	\$800	\$ 2,400.00
2019-12-14	CNR	Class-cert reply: Analyze then research and draft reply to WF's UCL-standing argument.	5	\$680	\$ 3,400.00
2019-12-14	LPL	Draft Plaintiffs' renewed motion for class certification; legal research for the same	7.4	\$465	\$ 3,441.00
2019-12-15	LCF	Assist with Reply in Support of Renewed Motion for Class Certification, including draft proposed response regarding fact section	1	\$425	\$ 425.00
2019-12-15	LPL	Continue drafting Plaintiffs' reply in support of renewed motion for class certification	5.9	\$465	\$ 2,743.50
2019-12-15	CNR	Class-cert reply: Analyze then research and draft reply to WF's UCL-standing argument.	6.4	\$680	\$ 4,352.00
2019-12-16	CNR	Hunting down some facts to add to draft UCL-standing reply.	0.5	\$680	\$ 340.00
2019-12-16	LCF	Analyze Wells Fargo's argument regarding damages available for Homeowners Bill of Rights claim and begin to research relevant case law regarding the same; outline preliminary thoughts regarding research	1	\$425	\$ 425.00
2019-12-16	CNR	Research for L. Lam: Wrongful-foreclosure (CA). Not all plaintiffs need assert all claims for cert. Numerosity and potential CA sub-subclass.	4	\$680	\$ 2,720.00
2019-12-16	LPL	Continue drafting and editing Plaintiffs' reply in support of renewed motion for class certification	6.9	\$465	\$ 3,208.50

2019-12-16	MLS	Work on class cert reply	7	\$800	\$ 5,600.00
2019-12-17	RMP	Review and analyze draft reply in support of motion for class certification	1.5	\$725	\$ 1,087.50
2019-12-17	LPL	Calls with A. Mura and C. Rosler re: edits to Plaintiffs' reply in support of renewed motion for class certification	1.6	\$465	\$ 744.00
2019-12-17	CNR	Research for L. Lam: Wrongful-foreclosure (CA). Not all plaintiffs need assert all claims for cert. Numerosity and potential CA sub-subclass.	2.8	\$680	\$ 1,904.00
2019-12-17	CNR	Research for and revisions to draft cert reply. Especially on UCL standing.	5.1	\$680	\$ 3,468.00
2019-12-18	CNR	Research for and revise draft cert reply. UCL standing.	3.7	\$680	\$ 2,516.00
2019-12-18	CNR	Revise IIED discussion for cert reply. Research as needed.	7.1	\$680	\$ 4,828.00
2019-12-19	LPL	Confer with M. Schrag and A. Mura re: plan for finalizing reply brief in support of renewed motion for class certification	0.6	\$465	\$ 279.00
2019-12-19	RMP	Work on reply on trial plan for class certification	1.5	\$725	\$ 1,087.50
2019-12-19	CNR	Extend specific items of research for UCL-standing reply.	2	\$680	\$ 1,360.00
2019-12-19	LPL	Further edits to Plaintiffs' draft reply brief in support of renewed motion for summary judgment	2.6	\$465	\$ 1,209.00
2019-12-19	CNR	Revise IIED discussion for cert reply. Research as needed.	3.8	\$680	\$ 2,584.00
2019-12-19	LCF	Begin to work on Reply regarding Trial Plan for Amended Class Certification, including analyze and outline thoughts in response to Wells Fargo's Opposition, research cases cited by Wells Fargo, and begin to draft Reply	4.6	\$425	\$ 1,955.00
2019-12-19	MLS	Work on class cert reply brief; tel. call with R. Paul re same; conf. with L. Lam re same	4.7	\$800	\$ 3,760.00
2019-12-20	LPL	Edits to draft reply in support of renewed motion for class certification; confer with M. Schrag re: same	2.4	\$465	\$ 1,116.00

2019-12-20	LCF	Continue to draft Reply regarding Trial Plan for Renewed Motion for Class Certification, including finish initial draft and circulate to team for review and edits	6	\$425	\$ 2,550.00
2019-12-21	LPL	E-mails with team re: draft reply brief in support of renewed motion for class certification	0.3	\$465	\$ 139.50
2019-12-21	MLS	Work on trial plan response and reply brief	2.5	\$800	\$ 2,000.00
2019-12-22	LCF	Assist with preparing to file reply in support of renewed motion for class certification, including draft update	0.2	\$425	\$ 85.00
2019-12-22	LCF	Continue to work on Reply regarding Trial Plan for Renewed Class Certification, including review and incorporate Mr. Schrag's edits and circulate revised draft; review additional edits from Mr. Paul and incorporate into further revised draft, including add missing citations and re-circulate draft	1.3	\$425	\$ 552.50
2019-12-22	LPL	Edits to reply brief in support of motion for class certification; e-mails with team re: same	1.8	\$465	\$ 837.00
2019-12-22	RMP	Draft reply brief in support of class certification	2	\$725	\$ 1,450.00
2019-12-22	MLS	Work on reply brief; emails and tel. calls with L. Lam re same	3.7	\$800	\$ 2,960.00
2019-12-23	LPL	E-mails with team re: finalizing reply brief in support of motion for class certification	0.4	\$465	\$ 186.00
2019-12-23	LCF	Continue to work on Reply in Support of Renewed Motion for Class Certification, analyze exhibits and information needed to finalize and file, and draft summary of exhibits needed	0.9	\$425	\$ 382.50
2019-12-23	RMP	Draft reply in support of motion for class certification	1.9	\$725	\$ 1,377.50
2019-12-23	MLS	Work on class cert reply brief	2	\$800	\$ 1,600.00
2019-12-23	KDJ	Work on reply to class certification	2.1	\$250	\$ 525.00

2019-12-24	LCF	Continue to work on Reply in Support of Renewed Motion for Class Certification, including continue to work on Reply regarding Trial Plan	0.5	\$425	\$ 212.50
2019-12-24	LPL	E-mails with team re: finalizing reply in support of motion for class certification	0.6	\$465	\$ 279.00
2019-12-24	RMP	Draft reply in support of certification	1.2	\$725	\$ 870.00
2019-12-24	LPL	Edits to Plaintiffs' reply in further support of motion for class certification	2.6	\$465	\$ 1,209.00
2019-12-24	MLS	Work on reply brief and trial plan response; tel. call with A. Mura and R. Paul re same	2.7	\$800	\$ 2,160.00
2019-12-25	MLS	Review, edit and finalize class cert reply brief; emails re same	1.5	\$800	\$ 1,200.00
2019-12-25	LPL	Finalize and file Plaintiffs' reply in support of renewed motion for class certification, with supporting declaration and exhibits	1.7	\$465	\$ 790.50
2020-01-02	LCF	Review and outline thoughts regarding Wells Fargo's request that we consent to their requested leave to file sur-reply; analyze same with team as well as next steps to schedule depositions of Wells Fargo's employees	0.3	\$425	\$ 127.50
2020-01-02	LPL	Conf. call with team re: WF's request to file a sur-reply on renewed motion for class certification	0.6	\$465	\$ 279.00
2020-01-02	MLS	Review cases in prep for class cert hearing; emails re HAMP-PRA issues re damages	1.5	\$800	\$ 1,200.00
2020-01-03	LPL	Review and analyze Wells Fargo's administrative motion to file a sur-reply re class cert motion	0.5	\$465	\$ 232.50
2020-01-03	MLS	Review adm motion re surreply; emails and tel. calls with L. Lam re same	0.8	\$800	\$ 640.00
2020-01-05	RMP	Review and analyze Wells Fargo's motion for leave to file sur-reply on class certification	0.1	\$725	\$ 72.50
2020-01-05	LPL	Draft opp. to Wells Fargo's admin motion to file a surreply in further opposition of renewed class cert motion	3.1	\$465	\$ 1,441.50
2020-01-06	MLS	Review def. counsel emails re HAMP-PRA class members	0.3	\$800	\$ 240.00

2020-01-06	MLS	Work on opp. to adm motion for surreply	1	\$800	\$ 800.00
2020-01-06	LPL	Further edits to Plaintiffs' opposition to WF's admin motion to file a surreply re class cert motion	2.6	\$465	\$ 1,209.00
2020-01-07	RMP	Draft response to Wells Fargo's request for a sur-reply on class certification	0.1	\$725	\$ 72.50
2020-01-07	LCF	Assist with response to Wells Fargo's Administrative Motion to file Sur-Reply in Opposition to Renewed Class Certification, including review Wells Fargo's filing, review and analyze draft response in opposition from Ms. Lam, redline proposed edits, and send proposed edits to team	0.5	\$425	\$ 212.50
2020-01-07	NS	Reviewing and cite checking Response to Admin Motion	1.6	\$415	\$ 664.00
2020-01-07	LPL	Further edits to, finalize, and file Plaintiffs' response to admin motion to file surreply on class cert motion	2.9	\$465	\$ 1,348.50
2020-01-08	LCF	Review final filing in opposition to Wells Fargo's Administrative Motion to file Sur-Reply in further opposition to class certification, including review local rules regarding whether a further reply is permitted, confirm briefing appears to be complete	0.1	\$425	\$ 42.50
2020-01-09	LPL	Confer with M. Schrag and L. Fellows re: planning for hearing on class cert, motion to amend, and discovery issues on 1/15	0.4	\$465	\$ 186.00
2020-01-09	MLS	Prep for class cert hearing	2	\$800	\$ 1,600.00
2020-01-10	LPL	Review and analyze Wells Fargo's surreply in further opposition to motion for class certification	0.3	\$465	\$ 139.50

2020-01-10	LCF	Begin to prepare for hearing on renewed motion for class certification as well as meet and confer ordered regarding recently filed letter brief, including analyze information needed to prepare and outline same for Mr. Neal to gather; as well as outline thoughts regarding meet and confer and talking points in advance of the same	0.8	\$425	\$ 340.00
2020-01-10	RPN	Prepare exhibits and pleadings for hearing on renewed motion for class certification and discovery meet and confer conference on Wednesday	1.4	\$230	\$ 322.00
2020-01-10	MLS	Review cases and prep for class cert hearing; review surreply; review discovery order; conf. with L. Lam re same	4.5	\$800	\$ 3,600.00
2020-01-11	LPL	E-mails with M. Schrag re: analyzing Wells Fargo's surreply in further opposition to motion for class cert	0.4	\$465	\$ 186.00
2020-01-11	LPL	E-mails with M. Schrag re: preparing for hearing on motion for class certification	0.8	\$465	\$ 372.00
2020-01-11	MLS	Prep for class cert hearing: work on argument outline and review cases and briefs	3	\$800	\$ 2,400.00
2020-01-12	MLS	Prep for class cert hearing; emails to team re class cert hearing	3.5	\$800	\$ 2,800.00
2020-01-13	LPL	Confer with M. Schrag and co-counsel re: Judge Alsup's directive to specify restitution for each CA class member at hearing on class cert motion	0.5	\$465	\$ 232.50
2020-01-13	LPL	Confer with M. Schrag re: preparing for hearing on renewed class certification motion	1.1	\$465	\$ 511.50
2020-01-13	RMP	Prepare for hearing on motion for class certification	1.8	\$725	\$ 1,305.00
2020-01-13	MLS	Prep for class cert hearing: review cases, work on outline; prepare restitution chart; meet w/ A. Mura; emails with R. Paul re same	6.5	\$800	\$ 5,200.00
2020-01-14	LPL	Work with M. Schrag on prep for hearing on renewed motion for class certification	2.2	\$465	\$ 1,023.00

2020-01-14	LPL	Work with M. Schrag and co-counsel re: laying out specific restitution amounts for each CA class member in preparation for hearing on class certification	3.2	\$465	\$ 1,488.00
2020-01-14	MLS	Prep for class cert hearing--work on outline and review briefs and cases--review JPML papers; review depo summary emails; emails to L. Lam re subclassing issue; work on restitution chart; tel. call with R. Paul re hearing	6.8	\$800	\$ 5,440.00
2020-01-14	LCF	Assist with preparations for hearing on Motion for Class Certification and Leave to File Third Amended Complaint, including review relevant pleadings and outline thoughts in advance of hearing, work with Ms. Lam to prepare talking points for oral argument regarding motion for leave to amend, and assist with gathering information needed related to numerosity question; as well as travel from Riverside to San Francisco for class certification hearing and preparations	7.6	\$425	\$ 3,230.00
2020-01-15	EHG	c/w AMM and MLS re class cert hearing, next steps	1	\$910	\$ 910.00
2020-01-15	NS	Compiling remediation amount re: CA class members	1	\$415	\$ 415.00
2020-01-15	LPL	Prep for and attend hearing on motion for leave to amend complaint and class certification	4.9	\$465	\$ 2,278.50
2020-01-15	MLS	Prep for class cert hearing and attend class cert hearing; meeting w/ E. Gibbs and A. Mura post hearing	5.8	\$800	\$ 4,640.00
2020-01-15	LCF	Attend hearing on Renewed Motion for Class Certification and Motion for Leave to File Third Amended Complaint, including finalize preparations for the same with Mr. Schrag and Ms. Lam and outline next steps with Ms. Lam; and return travel from San Francisco to Kansas City	10.9	\$425	\$ 4,632.50

2020-01-17	NRL	Continued researching case law concerning form contract interpretation; began building out chart with relevant findings	2	\$275	\$ 550.00
2020-01-20	NRL	Continued building out research on interpretation of form contracts by jurisdiction; searched Westlaw and Lexis advance databases for relevant case law and secondary sources; review cases and secondary sources	5.4	\$275	\$ 1,485.00
2020-01-21	JJB	Call with co-counsel re Court's order re federal vs. common law	0.8	\$580	\$ 464.00
2020-01-21	LPL	Conf. call with team re: the Court's order that we submit authority on whether federal common law or state contract law applies	0.8	\$465	\$ 372.00
2020-01-21	MLS	Conf. call re federal common law filing; review/edit drafts of same;	1.3	\$800	\$ 1,040.00
2020-01-21	RMP	Work on response to Court's request for applicable law	1.4	\$725	\$ 1,015.00
2020-01-21	JJB	Research and drafting of response to notice re class certification	1.7	\$580	\$ 986.00
2020-01-21	LPL	Legal research for and draft response to Court's order on whether federal common law or state law applies	2.7	\$465	\$ 1,255.50
2020-01-21	NRL	Continued researching for project concerning federal common law versus state law; joined telephonic conference to discuss research and new trajectory for filing	3.6	\$275	\$ 990.00
2020-01-22	LPL	Confer with team re: filing in response to Court's request for authorities on whether to apply federal common law or state law	0.4	\$465	\$ 186.00
2020-01-22	LPL	Review and analyze WF's response to Court's request for authority on whether federal common law or state law applies; confer with M. Schrag and A. Mura re: same	0.5	\$465	\$ 232.50
2020-01-22	LPL	Review and analyze WF's administrative motion to file a supplemental brief on Plaintiffs' restitution chart; confer with M. Schrag re: same	0.5	\$465	\$ 232.50

2020-01-22	RMP	Work on response to Court's request for briefing on choice-of-law	0.5	\$725	\$ 362.50
2020-01-22	LPL	Conf. call with team re: responding to WF's administrative motion, upcoming depositions, and dispositive motions	1.1	\$465	\$ 511.50
2020-01-22	JJB	Additional research re response to notice re class certification	1.8	\$580	\$ 1,044.00
2020-01-22	MLS	Work on supplemental filing on federal common law; conf. with A. Mura and L. Lam re same	2.5	\$800	\$ 2,000.00
2020-01-22	LPL	Edit, finalize, and file Plaintiffs' response to Court's request that parties submit a filing on whether federal common law or state law applies	2.6	\$465	\$ 1,209.00
2020-01-23	RMP	Review Well Fargo's latest filings regarding contract interpretation and restitution	0.6	\$725	\$ 435.00
2020-01-23	MLS	Research re response to adm. motion; conf. with L. Lam re same	0.8	\$800	\$ 640.00
2020-01-23	LPL	Confer with M. Schrag re: Plaintiffs' response to WF's admin motion for supplemental brief on restitution theory	0.9	\$465	\$ 418.50
2020-01-23	LPL	Begin drafting Plaintiffs' opposition to WF's admin motion for supplemental briefing on restitution; legal research for the same	1.8	\$465	\$ 837.00
2020-01-23	NRL	Reviewed briefing submitted yesterday concerning federal common law vs state law in interpreting form contracts; continued building motion for partial Summary Judgment; researched Home Affordable Modification Program guidelines and Fannie Mae servicing guide for extrinsic evidence as to "cure default"; reviewed partner's added research materials on Code of Federal Regulations and other regulations to motion	7.5	\$275	\$ 2,062.50
2020-01-24	MLS	Review Defs. adm motion re restitution; legal research re same; emails re same; conf. call with Team re restitution response and plaintiff depositions	2.2	\$800	\$ 1,760.00

2020-01-24	LPL	Draft Plaintiffs' opposition to Wells Fargo's admin motion to submit supplemental brief on restitution	2.8	\$465	\$ 1,302.00
2020-01-25	LPL	Continue drafting Plaintiffs' response to WF's admin motion for additional briefing on Plaintiffs' restitution theory	3.8	\$465	\$ 1,767.00
2020-01-26	MLS	Work on opp. to adm motion	1.3	\$800	\$ 1,040.00
2020-01-27	LPL	Confer with M. Schrag re: additions to Plaintiffs' opp. to WF's admin motion for supplemental briefing on restitution	0.3	\$465	\$ 139.50
2020-01-27	RMP	Draft response to administrative motion	0.4	\$725	\$ 290.00
2020-01-27	AMM	Edits to draft opposition to WF's motion for supplemental briefing on restitution; confer with L. Lam and M. Schrag re same	1.3	\$720	\$ 936.00
2020-01-27	LPL	Legal research for additional authorities to include in Plaintiffs' opp. to WF's admin motion to file supplemental brief	1.4	\$465	\$ 651.00
2020-01-27	LPL	Edit, finalize, and help file Plaintiffs' opposition to Wells Fargo's admin motion for supplemental briefing on restitution	3.5	\$465	\$ 1,627.50
2020-01-27	MLS	Work on Opp. to Adm Motion; legal research re same; tel. calls with D. Salah re same; tel. calls with R. Paul re same; conf. with L. Lam and A. Mura re same	3.8	\$800	\$ 3,040.00
2020-01-29	LCF	Review Order regarding class certification and begin to outline thoughts regarding next steps	0.2	\$425	\$ 85.00
2020-01-29	EHG	Review class certification order, team call re next steps	0.6	\$910	\$ 546.00
2020-01-29	JJB	Review and analyze class certification order	0.6	\$580	\$ 348.00
2020-01-29	RMP	Analyze class certification order and case strategy	0.6	\$725	\$ 435.00
2020-01-29	LPL	Review and analyze order on motion for class certification; confer with team re: same	0.9	\$465	\$ 418.50
2020-01-29	MLS	Review class cert order; tel. call with E. Gibbs, R. Paul and L. Lam re class cert order; emails re same	2	\$800	\$ 1,600.00

2020-01-30	EHG	Carefully review class cert order, email strategy points to team	0.6	\$910	\$ 546.00
2020-01-30	EHG	c/w MLS, AMM, Rick Paul re next steps following class cert order, discovery, class notice, related matters	0.7	\$910	\$ 637.00
2020-01-30	JJB	Analyze class certification order and draft email re questions raised by same	1.3	\$580	\$ 754.00
2020-01-30	JJB	Research re implications of class certification order	2.4	\$580	\$ 1,392.00
2020-01-31	MLS	Meet and conf. with def. counsel re post class cert ruling issues; tel, call with M. Dann re certification;	1.2	\$800	\$ 960.00
2020-01-31	JJB	Research re implications of class certification order	3.5	\$580	\$ 2,030.00
2020-02-02	MLS	Work on class notice	1	\$800	\$ 800.00
2020-02-04	JJB	Research re impact of class certification order	1.3	\$580	\$ 754.00
		Project Total:	691.5		\$ 396,817.00
Project: Damages Research and Damages Expert report – Dan Salah					
Date	Timekeeper	Description	Hours x Rate = Fee		
2018-12-03	RMP	Analyze potential claims and damages	0.6	\$725	\$ 435.00
2018-12-03	AGS	Research state law on emotional distress damages; research U.S. Securities and Exchange Commission filings	2.4	\$575	\$ 1,380.00
2018-12-04	AGS	Continue research; pull page of U.S. Securities and Exchange Commission filings for M. Schrag; call with M. Schrag	3	\$575	\$ 1,725.00
2018-12-21	RMP	Work on analyzing claims and legal strategy regarding damages	0.6	\$725	\$ 435.00
2018-12-21	AGS	Research damages available in foreclosure cases; communications regarding mediations currently scheduled and meet and confer with defense counsel	1.3	\$575	\$ 747.50

2019-05-24	LCF	Begin to analyze potential method by which to calculate claims for various plaintiffs, including analyze USC sex abuse claims and settlement method in that matter, draft assignment for Mr. Brand to review, analyze, and create summary of settlement procedure in that matter, send summary of task and relevant documents to him for review	0.4	\$425	\$ 170.00
2019-05-27	LCF	Continue to work on claims matrix, including review state breakdown from Wells Fargo and forward the same to Mr. Brand to assist with preliminary draft matrix	0.1	\$425	\$ 42.50
2019-05-29	GRB	Review recent case to compare similarities in posture and resolution of claims	2	\$275	\$ 550.00
2019-05-30	LCF	Continue to outline potential settlement process and strategy, including review research/thoughts from Mr. Brand regarding settlement reached in the USC sex abuse case, draft summary of same and relevant claims' analysis process/procedure as potentially applicable here	0.7	\$425	\$ 297.50
2019-05-30	GRB	Compile claims data into workable spreadsheet	1.5	\$275	\$ 412.50
2019-05-30	GRB	Review recent case to compare similarities in posture and resolution of claims	1.7	\$275	\$ 467.50
2019-05-31	LCF	Continue to analyze claims matrix and organization of claims by states	0.4	\$425	\$ 170.00
2019-06-14	MLS	Emails with co-counsel re damages analysis	0.3	\$800	\$ 240.00
2019-06-14	AGS	Work on strategy for settlement matrix, documents we need for individual clients from Wells Fargo and information we should collect from clients to provide to Wells Fargo in advance of any mediation	0.5	\$575	\$ 287.50
2019-06-17	MLS	Review A. Schwarz initial damages spreadsheet	0.3	\$800	\$ 240.00

2019-06-17	AGS	Work on Settlement Matrix; research recoverable damages in wrongful foreclosure; identify documents we need produced by Wells Fargo for mediation; start drafting Plaintiff Facts Sheet	3.9	\$575	\$ 2,242.50
2019-10-11	JJB	Research re potential for recovery of post-foreclosure equity	2.2	\$580	\$ 1,276.00
2019-10-14	JJB	Further research re potential for recovery of post-foreclosure equity	3.4	\$580	\$ 1,972.00
2019-10-15	JJB	Further research re potential for recovery of post-foreclosure equity	3.9	\$580	\$ 2,262.00
2019-10-21	MLS	Discussions w L. Lam re damages research;	0.3	\$800	\$ 240.00
2019-10-22	LPL	E-mail to C. Rosler re: legal research on remedies to Plaintiffs' live causes of action	0.2	\$465	\$ 93.00
2019-10-22	JJB	Call with C. Rosler re damages research	0.5	\$580	\$ 290.00
2019-10-22	MLS	Tel. call w C. Roser re damages research	0.5	\$800	\$ 400.00
2019-10-23	CNR	Start damages research project.	4	\$680	\$ 2,720.00
2019-10-24	CNR	Damages research project.	2	\$680	\$ 1,360.00
2019-10-25	CNR	Damages research project.	3.2	\$680	\$ 2,176.00
2019-10-28	CNR	Damages research project.	3.7	\$680	\$ 2,516.00
2019-10-31	CNR	Continue on national damages research.	2.8	\$680	\$ 1,904.00
2019-11-01	CNR	Continue nationwide damages research.	8.7	\$680	\$ 5,916.00
2019-11-03	CNR	Continue nationwide damages research.	3	\$680	\$ 2,040.00
2019-11-05	CNR	Continue nationwide damages research. Focusing now on California claims for possible early subclass. Extending 11/4 "provisional" memo.	7.2	\$680	\$ 4,896.00
2019-11-06	LPL	Call with M. Schrag and potential expert Dan Salah re: categories of damages to calculate for our class representatives	0.5	\$465	\$ 232.50
2019-11-06	NS	Generating spreadsheet regarding client mortgage payments	2.9	\$415	\$ 1,203.50

2019-11-06	CNR	Continue nationwide damages research. Revise CA-UCL part of memo. Extend into CA breach of contract. Then back to national research.	3	\$680	\$ 2,040.00
2019-11-07	LPL	Confer with and e-mail to N. Shah re: gathering documents and discovery responses on what named plaintiffs have produced thus far to evidence their damages	0.4	\$465	\$ 186.00
2019-11-07	LCF	Initial call with potential damages expert, Mr. Salah, including outline thoughts regarding potential, additional damages categories, preliminary analysis by Mr. Salah and information he would need for the same	0.5	\$425	\$ 212.50
2019-11-07	NS	Conf call re: damages	0.5	\$415	\$ 207.50
2019-11-07	LPL	Conf. call with potential expert Dan Salah and team re: framework for damages report for class representatives	0.6	\$465	\$ 279.00
2019-11-07	NS	Compiling documents for expert analysis re: loss of equity	1.2	\$415	\$ 498.00
2019-11-07	CNR	Finalize California damages research. Draft memo section; revise existing material on UCL-restitution and lost equity.	2.5	\$680	\$ 1,700.00
2019-11-07	NS	Generating spreadsheet regarding client mortgage payments	3	\$415	\$ 1,245.00
2019-11-07	MLS	Emails w L. Lam and E. Gibbs re class cert strategy and briefing; tel call w A. Mura re same; tel. call w L. Lam re class cert and damages reports; legal research re damages and restitution and emails re same; conf. call w D. Salah re damages report	3.3	\$800	\$ 2,640.00
2019-11-08	LPL	E-mails with team re: legal research on lost equity damages and rent as a form of damages	0.2	\$465	\$ 93.00
2019-11-08	LPL	Confer with N. Shah re: compiling evidence of named plaintiffs' damages for potential expert witness Dan Salah	0.3	\$465	\$ 139.50
2019-11-08	NS	Damages research	0.5	\$415	\$ 207.50

2019-11-08	LCF	Assist with preparing information to be submitted to damages' expert, Mr. Salah, for preliminary analysis, including locate relevant information of Mr. and Mrs. Simoneaux and outline relevant facts; forward information to Ms. Lam for final submission to Mr. Salah	0.7	\$425	\$ 297.50
2019-11-08	RMP	Work on evaluating potential expert witnesses	0.7	\$725	\$ 507.50
2019-11-08	MLS	Conf. call re damages; review materials sent to damages experts; conf w L. Lam re class cert brief; conf. w D. Stein re same; conf w L. Lam and N. Shah re damages evidence. legal research re damages	2.2	\$800	\$ 1,760.00
2019-11-08	CNR	Finalize California damages research. Draft memo section; revise existing material on UCL-restitution and lost equity. Extend CA research through "appreciation damages" case.	3.6	\$680	\$ 2,448.00
2019-11-09	LCF	Review information submitted to Mr. Salah regarding "test" plaintiffs for his review and preliminary analysis	0.2	\$425	\$ 85.00
2019-11-11	MLS	Tel. call w D. Salah re damages	0.7	\$800	\$ 560.00
2019-11-11	CNR	Finish California "appreciation damages" research. Draft memo.	3.3	\$680	\$ 2,244.00
2019-11-12	NS	Locating and preparing document re damages	1.1	\$415	\$ 456.50
2019-11-12	CNR	Finish California "appreciation damages" research. Draft memo.	3.2	\$680	\$ 2,176.00
2019-11-13	LPL	Confer with N. Shah re: gathering evidence on named plaintiffs' damages	0.2	\$465	\$ 93.00
2019-11-13	NS	Reviewing evidence to support damages	7.2	\$415	\$ 2,988.00
2019-11-15	CNR	Continue California research on damages available for various claims, and memos.	1	\$680	\$ 680.00
2019-11-15	NS	Reviewing evidence to support damages	2.7	\$415	\$ 1,120.50
2019-11-16	CNR	Extend UCL-restitution research (tracking from Pulaski) per MLS.	3.9	\$680	\$ 2,652.00
2019-11-18	MLS	Conf. call w D. Salah and R. Paul re damages and expert report	1	\$800	\$ 800.00

2019-11-18	CNR	Revise memo, create short cites for UCL-restitution research. Continue with Cal.-IIED damages research.	7.3	\$680	\$ 4,964.00
2019-11-19	CNR	Continue CA research: Appreciation as consequential damages for contract claim.	6.2	\$680	\$ 4,216.00
2019-11-20	CNR	Return to other (national-damages) research.	1.8	\$680	\$ 1,224.00
2019-11-20	CNR	Short memo on national contract appreciation-damages research.	4.4	\$680	\$ 2,992.00
2019-11-21	CNR	Continue, expand national-damages research.	4	\$680	\$ 2,720.00
2019-11-22	MLS	Review D. Salah draft report; conf. w L. Lam re discovery needed for damages model; emails re same	1.7	\$800	\$ 1,360.00
2019-11-25	LPL	E-mails with defense counsel re: understanding each Plaintiffs' cap sheet and would-be modified loan terms	0.6	\$465	\$ 279.00
2019-11-25	MLS	Emails w R. Paul re damages and discovery issues; review D. Salah draft damages analysis	0.7	\$800	\$ 560.00
2019-11-26	NS	Discussion with MLS re: property tax records	0.1	\$415	\$ 41.50
2019-11-26	NS	Discussion re: damages chart	0.1	\$415	\$ 41.50
2019-11-26	LPL	E-mails with defense counsel re: reviewing Plaintiffs' cap sheets and interpreting them	0.5	\$465	\$ 232.50
2019-11-26	LPL	Draft e-mail to defense counsel re: Plaintiffs' position on mediation privilege and Plaintiffs' potential experts	0.6	\$465	\$ 279.00
2019-11-26	NS	Locating documents re loans	1	\$415	\$ 415.00
2019-11-26	NS	Researching property tax records	1.6	\$415	\$ 664.00
2019-11-26	LPL	Conf. call with team re: upcoming close of discovery, damages reports, and plan for class cert reply	2.1	\$465	\$ 976.50
2019-11-26	NS	Team Conference Call re: discovery and damages	2.1	\$415	\$ 871.50
2019-11-26	MLS	Conf. call w team re expert reports and discovery issues; conf. call w D. Salah re damages analysis; review draft analysis; emails re damages discovery/cap sheets	2.2	\$800	\$ 1,760.00

2019-11-27	LPL	E-mails with N. Shah re: pulling documents and data regarding Plaintiffs' would-be modifications for Dan Salah to review	0.5	\$465	\$ 232.50
2019-11-29	NS	Generating damages chart by reviewing Plaintiff Hood's initial disclosures, ROG responses, depo transcripts, and document production	0.6	\$415	\$ 249.00
2019-11-29	NS	Generating damages chart by reviewing Plaintiff Trevino's initial disclosures, ROG responses, depo transcripts, and document production.	1.3	\$415	\$ 539.50
2019-11-29	NS	Generating damages chart by reviewing Plaintiffs Simoneauxs' initial disclosures, ROG responses, depo transcripts, and document production.	1.7	\$415	\$ 705.50
2019-11-29	NS	Generating damages chart by reviewing Plaintiff Teague's initial disclosures, ROG responses, depo transcripts, and document production.	1.8	\$415	\$ 747.00
2019-12-02	MLS	Emails w damages expert D. Salah	0.2	\$800	\$ 160.00
2019-12-02	LPL	Gather relevant documents on named Plaintiffs to send to expert witness Dan Salah for his report on damages; confer with N. Shah re: same	1.4	\$465	\$ 651.00
2019-12-02	CNR	Final stage of nationwide damages research.	3	\$680	\$ 2,040.00
2019-12-03	LPL	E-mails with N. Shah and expert Dan Salah re: documents/information Salah needs for his expert report	0.7	\$465	\$ 325.50
2019-12-03	NS	Reviewing White's depo for background facts re: damages	0.8	\$415	\$ 332.00
2019-12-03	NS	Reviewing Frye's depo for background facts re: damages	0.9	\$415	\$ 373.50
2019-12-03	NS	Reviewing Granja's depo for background facts re: damages	1	\$415	\$ 415.00
2019-12-03	MLS	Emails and tel. calls re damages analysis; tel. call w R. Paul re same and re bank expert	1.5	\$800	\$ 1,200.00
2019-12-03	CNR	Wrongful-foreclosure damages in Georgia. Research and memo.	2.6	\$680	\$ 1,768.00
2019-12-04	NS	Emailing info re property value to damages expert	0.1	\$415	\$ 41.50

2019-12-04	LPL	E-mails with expert Dan Salah re: additional information he needs for his expert report	0.4	\$465	\$ 186.00
2019-12-04	CNR	Finish wrongful-foreclosure damages in Georgia. Move on to consumer-protection laws. Research and memo.	4.1	\$680	\$ 2,788.00
2019-12-05	LPL	Review expert Dan Salah's draft damages analysis	0.4	\$465	\$ 186.00
2019-12-05	LPL	Work with paralegal to gather additional data on plaintiffs' foreclosure dates for Dan Salah's damages analysis	0.4	\$465	\$ 186.00
2019-12-05	LPL	Confer with N. Shah re: gathering additional data for damages analysis	0.4	\$465	\$ 186.00
2019-12-05	NS	Reviewing Russell Simoneaux's depo for background facts re: damages	0.5	\$415	\$ 207.50
2019-12-05	NS	Reviewing Teague's depo for background facts re: damages	0.7	\$415	\$ 290.50
2019-12-05	MLS	Conf. call w D. Salah; review damages analysis and discuss same w R. Paul and J. Bloomfield	0.8	\$800	\$ 640.00
2019-12-05	LCF	Continue to work on damages report, including analyze draft from Mr. Salah and participate in call with Mr. Salah regarding draft report	1	\$425	\$ 425.00
2019-12-05	LPL	Conf. call with team re: expert Dan Salah's draft damages analysis	1	\$465	\$ 465.00
2019-12-05	NS	Team Conference Call with Dan Salah re damages	1	\$415	\$ 415.00
2019-12-05	NS	Reviewing Brenda Simoneaux's depo for background facts re: damages	1	\$415	\$ 415.00
2019-12-05	CNR	Finish wrongful-foreclosure damages in Georgia. Move on to consumer-protection laws. Research and memo.	4.2	\$680	\$ 2,856.00
2019-12-06	LPL	E-mails with expert Dan Salah re: additional data for his damages report	0.3	\$465	\$ 139.50
2019-12-06	NS	Reviewing Hernandez's depo for background facts re: damages	0.4	\$415	\$ 166.00
2019-12-06	NS	Reviewing Yvonne DeMartino's depo for background facts re: damages	0.8	\$415	\$ 332.00
2019-12-06	NS	Reviewing John DeMartino's depo for background facts re: damages	1.3	\$415	\$ 539.50

2019-12-06	LCF	Continue to work on damages expert report, including research question regarding Wells Fargo's tax treatment of remediation funds, locate and send relevant documents/examples and outline preliminary thoughts regarding taxes; initially correspond with Certified Public Accountant regarding preliminary taxation questions and whether to 'true up' class members' damages, including send follow-up correspondence along with copy of the protective order; and follow-up call with Certified Public Accountant regarding tax questions and send summary of information learned to the team	1.6	\$425	\$ 680.00
2019-12-06	CNR	Revising omnibus nationwide-damages memo.	2.2	\$680	\$ 1,496.00
2019-12-08	NS	Reviewing George Floyd's depo for background facts re: damages	0.5	\$415	\$ 207.50
2019-12-08	NS	Continued reviewing of Hernandez's depo for background facts re: damages	1	\$415	\$ 415.00
2019-12-08	NS	Reviewing Hood's depo for background facts re: damages	1	\$415	\$ 415.00
2019-12-08	NS	Reviewing Wilson's depo for background facts re: damages	1.4	\$415	\$ 581.00
2019-12-09	LPL	E-mail to expert Dan Salah re: cap sheets and other relevant information on CA class member damages	0.6	\$465	\$ 279.00
2019-12-09	NS	Reviewing Trevino's depo for background facts re: damages	1.3	\$415	\$ 539.50
2019-12-09	NS	Reviewing Cyndi Floyd's depo for background facts re: damages	1.8	\$415	\$ 747.00
2019-12-10	MLS	Emails re Salah report and documents needed	0.2	\$800	\$ 160.00
2019-12-10	LPL	E-mails with expert Dan Salah and N. Shah re: getting Dan the information he needs on CA class members' damages	0.6	\$465	\$ 279.00
2019-12-10	NS	Generating damages chart by reviewing Plaintiff Hernandez's initial disclosures, ROG responses, depo transcripts, and document production.	1	\$415	\$ 415.00

2019-12-10	NS	Review for documents re absent class members' property addresses	3.6	\$415	\$ 1,494.00
2019-12-10	CNR	Revising omnibus nationwide-damages memo. Consumer-protection research.	4	\$680	\$ 2,720.00
2019-12-11	NS	Email discussion re: absent class members' addresses	0.1	\$415	\$ 41.50
2019-12-11	NS	Generating damages chart by continued review of Plaintiff Hernandez's initial disclosures, ROG responses, depo transcripts, and document production.	0.6	\$415	\$ 249.00
2019-12-11	LPL	E-mails and confer with M. Schrag and co-counsel re: information to provide to damages expert Dan Salah	0.8	\$465	\$ 372.00
2019-12-11	NS	Generating damages chart by reviewing of Plaintiffs John and Yvonne Demartino's initial disclosures, ROG responses, depo transcripts, and document production.	1.5	\$415	\$ 622.50
2019-12-11	NS	Generating damages chart by reviewing Plaintiff Wilson's initial disclosures, ROG responses, depo transcripts, and document production.	1.8	\$415	\$ 747.00
2019-12-11	CNR	Consumer-protection research exclusively.	3.8	\$680	\$ 2,584.00
2019-12-11	CNR	Revising omnibus nationwide-damages memo.	4	\$680	\$ 2,720.00
2019-12-12	NS	Locating and transmitting chart for Dan Salah	0.2	\$415	\$ 83.00
2019-12-12	NS	Call with LPL re: absent class members' loan files and docs for Dan Salah	0.4	\$415	\$ 166.00
2019-12-12	NS	Reviewing Hernandez's depo and locating info re foreclosure	0.5	\$415	\$ 207.50
2019-12-12	NS	Generating damages chart by reviewing Plaintiffs George and Cyndi Floyd's initial disclosures, ROG responses, depo transcripts, and document production.	1.4	\$415	\$ 581.00
2019-12-12	NS	Generating damages chart by continued reviewing of Plaintiffs John and Yvonne Demartino's initial disclosures, ROG responses, depo transcripts, and document production.	1.6	\$415	\$ 664.00

2019-12-12	NS	Reviewing and compiling documents for Dan Salah re: expert report	1.8	\$415	\$ 747.00
2019-12-12	CNR	Consumer-protection (IL) research and memo.	4.1	\$680	\$ 2,788.00
2019-12-13	LPL	Confer with paralegal re: gathering additional data for expert Dan Salah's damages report	0.4	\$465	\$ 186.00
2019-12-13	MLS	Tel. calls w D. Salah re expert report issues; emails re missing data	0.8	\$800	\$ 640.00
2019-12-13	CNR	Consumer-protection (MD) research and memo.	2	\$680	\$ 1,360.00
2019-12-14	NS	Tracking documents for absent class members re cap sheets and property addresses	0.7	\$415	\$ 290.50
2019-12-14	NS	Generating damages chart by continued reviewing of Plaintiffs George and Cyndi Floyd's initial disclosures, ROG responses, depo transcripts, and document production.	1.9	\$415	\$ 788.50
2019-12-14	NS	Compiling documents for Dan Salah re: foreclosure	1.9	\$415	\$ 788.50
2019-12-16	NS	Transmitting documents and summaries for review by Dan Salah	0.2	\$415	\$ 83.00
2019-12-16	NS	Reviewing team email communications re damages and absent class members.	0.3	\$415	\$ 124.50
2019-12-16	NS	Reviewing Jose Chavez's loan file	0.5	\$415	\$ 207.50
2019-12-16	LPL	Review and analyze Dan Salah's draft expert report on damages	0.9	\$465	\$ 418.50
2019-12-16	NS	Team conference call re: damages	1.2	\$415	\$ 498.00
2019-12-16	LPL	Conf. calls with M. Schrag, co-counsel, and expert Dan Salah re: latest draft of his report and potential edits/additions	1.9	\$465	\$ 883.50
2019-12-16	MLS	Work on Salah expert report; conf. call re same;	2.7	\$800	\$ 2,160.00

2019-12-16	LCF	Continue to work on damages expert report, including review, analyze, and outline thoughts regarding potential questions about initial damage calculations and California plaintiffs that did not lose homes to foreclosure, as well as propose edits/general changes to Mr. Salah's draft report and circulate to the team; correspond with Mr. Salah and team regarding specific questions and potential edits, including damage calculations for those that did not lose home to foreclosure; begin to research relevant documents regarding specific California plaintiffs that did not lose homes to foreclosure and circulate facts learned; follow-up call with Mr. Salah and team regarding report and continue to analyze specific questions regarding non-foreclosure plaintiffs	4.8	\$425	\$ 2,040.00
2019-12-16	NS	Document review and fact research re damages	4.9	\$415	\$ 2,033.50
2019-12-17	LPL	E-mails with M. Schrag and co-counsel re: edits to Dan Salah's expert report	0.9	\$465	\$ 418.50
2019-12-17	NS	Team conference call re: damages	0.9	\$415	\$ 373.50
2019-12-17	LCF	Continue to work on damages expert report, including begin to review revised draft from Mr. Salah; participate in call with him regarding revisions and next steps to finalize report	1.1	\$425	\$ 467.50
2019-12-17	LPL	Conf. calls with M. Schrag, co-counsel, and D. Salah re: latest draft of expert report and potential edits/additions	1.5	\$465	\$ 697.50
2019-12-17	RMP	Review and comment on expert report	1.5	\$725	\$ 1,087.50
2019-12-17	MLS	Work on Salah expert report and tel. calls re same	4.3	\$800	\$ 3,440.00
2019-12-18	RMP	Work with expert Salah to finalize report and gather information	2	\$725	\$ 1,450.00

2019-12-18	LCF	Assist with finalizing expert witness report for Mr. Salah, including review and edit final draft report	2.7	\$425	\$ 1,147.50
2019-12-18	MLS	Work on Salah expert report; tel. calls w R. Paul, L. Lam, and D. Salah re same	2.8	\$800	\$ 2,240.00
2020-01-02	LPL	Review and analyze document subpoenas to expert witnesses; e-mails to witnesses re: same	0.8	\$465	\$ 372.00
2020-01-02	MLS	Conf. call w team re depos and expert discovery and adm motion for sur-reply	0.8	\$800	\$ 640.00
2020-01-02	LPL	Confer with M. Schrag and e-mails with defense counsel re: correct cap sheets for CA class members Hayden and Chavez	1.1	\$465	\$ 511.50
2020-01-03	RMP	Review and analyze Wells Fargo's expert reports; evaluate potential rebuttal reports	0.3	\$725	\$ 217.50
2020-01-03	LPL	Review and analyze Wells Fargo's expert rebuttal reports	0.7	\$465	\$ 325.50
2020-01-03	LCF	Begin to review and analyze Christopher James' expert report, Wells Fargo's Reply damages expert, including begin to outline thoughts regarding potential rebuttal report	0.8	\$425	\$ 340.00
2020-01-03	MLS	Review WF expert reports; conf. call re same and adm motion re surreply; call D. Salah and B. Kelly re rebuttal reports	3.2	\$800	\$ 2,560.00
2020-01-06	NS	Adding cap sheets for CA Class Members to Damages Chart	0.1	\$415	\$ 41.50
2020-01-06	NS	Team Conf call re damages expert rebuttal	0.5	\$415	\$ 207.50
2020-01-06	LPL	Conf. call with team re: Dan Salah's expert rebuttal report	0.5	\$465	\$ 232.50
2020-01-06	MLS	Conf. call w D. Salah and Team re rebuttal report;	0.5	\$800	\$ 400.00

2020-01-06	LCF	Continue to analyze potential rebuttal report for Mr. Salah, including outline and analyze thoughts regarding same with Mr. Paul; call with Mr. Salah regarding potential rebuttal and thoughts regarding Wells Fargo's expert report	1	\$425	\$ 425.00
2020-01-07	MLS	Work on Salah rebuttal report; tel.call w R. Paul re same	2.2	\$800	\$ 1,760.00
2020-01-08	LPL	Conf. call with team re: draft rebuttal expert reports	0.4	\$465	\$ 186.00
2020-01-08	RMP	Work on rebuttal report from Salah	0.4	\$725	\$ 290.00
2020-01-08	LPL	Conf. call with co-counsel and expert Dan Salah re: edits to draft expert rebuttal report	0.6	\$465	\$ 279.00
2020-01-08	LPL	Review and analyze expert Dan Salah's draft rebuttal expert report	0.7	\$465	\$ 325.50
2020-01-08	LCF	Continue to work on rebuttal expert report for Mr. Salah, including review and outline thoughts regarding changes to latest draft rebuttal from Mr. Salah; correspond with co-counsel regarding specific legal questions with respect to Mr. Salah's rebuttal report	0.8	\$425	\$ 340.00
2020-01-08	MLS	Work on Salah expert rebuttal report; conf. call w Team re same; emails re same	1	\$800	\$ 800.00
2020-01-09	RMP	Work on expert rebuttal reports	0.6	\$725	\$ 435.00
2020-01-09	MLS	Work on Salah rebuttal expert report	1	\$800	\$ 800.00
2020-01-09	LCF	Assist with finalizing rebuttal expert report for Mr. Salah, including review, proofread/analyze, and provide edits, incorporate various revisions, and circulate proposed final draft	1.2	\$425	\$ 510.00
2020-01-10	LPL	Conf. call with team and expert Dan Salah re: amendments to Salah report based on WF's recent set of interrogatory responses	0.4	\$465	\$ 186.00
2020-01-10	LPL	Review and analyze WF's recent interrogatory responses and see whether they affect Dan Salah's damages report	0.5	\$465	\$ 232.50

2020-01-10	LPL	Review information on Chavez and Hayden that would be relevant to amendments to Dan Salah's expert report on damages; e-mails with co-counsel re: same	1.1	\$465	\$ 511.50
2020-01-11	LPL	E-mails with expert Dan Salah re: new information from Wells Fargo on CA class members' would-be modifications	0.2	\$465	\$ 93.00
2020-01-11	MLS	Tel. call and emails w D. Salah about amending expert report	0.3	\$800	\$ 240.00
2020-01-12	MLS	Review Salah emails and report	0.7	\$800	\$ 560.00
2020-01-13	LPL	E-mails with expert Dan Salah re: draft of updated expert report on damages	0.3	\$465	\$ 139.50
2020-01-13	NS	Updating damages chart re CA absent class members	0.7	\$415	\$ 290.50
2020-01-14	NS	Editing damages chart by reviewing Campos' deposition	1.5	\$415	\$ 622.50
2020-01-15	LPL	E-mails with defense counsel re: a document that Dan Salah reviewed in connection with preparing his rebuttal report	0.1	\$465	\$ 46.50
2020-01-16	LPL	Confer with M. Schrag and damages expert Dan Salah re: updating expert report and preparing for deposition	0.4	\$465	\$ 186.00
		Project Total:	301.8		\$ 175,386.00
Project: Expert report – Brian Kelley					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-27	RMP	Research potential expert witnesses	0.4	\$725	\$ 290.00
2019-11-27	MLS	Email and tel. call w R. Paul re bank expert; Emails re absent class member depositions; review depo prep outline; email re Coffin and Nold depo notices	2.3	\$800	\$ 1,840.00
2019-12-02	MLS	Tel. call w R. Paul re evidentiary issues and banking expert	0.3	\$800	\$ 240.00
2019-12-03	RMP	Investigate potential expert witnesses	0.2	\$725	\$ 145.00
2019-12-03	LCF	Begin to work on potential bank standards expert witness, including analyze potential witnesses and send potential witnesses to Mr. Paul	0.3	\$425	\$ 127.50

2019-12-04	LCF	Continue to work on banking expert, including preliminarily correspond with potential experts and update Mr. Paul regarding the same; correspond with Mr. Kelley regarding potential engagement	1.6	\$425	\$ 680.00
2019-12-04	MLS	Conf. call w banking expert; review expert related documents; tel. calls w R. Paul re same; conf. w L. Lam re same	2.3	\$800	\$ 1,840.00
2019-12-04	RMP	Interview and investigate potential expert witnesses; work on chronology of hot documents; prepare for depositions	3	\$725	\$ 2,175.00
2019-12-05	MLS	Emails re B. Kelly expert opinions in other cases	0.3	\$800	\$ 240.00
2019-12-05	LCF	Gather and send relevant documents, including signed engagement letter, to Mr. Kelley	1.1	\$425	\$ 467.50
2019-12-05	NS	Researching potential banking expert re testimony or Daubert motions.	2.2	\$415	\$ 913.00
2019-12-05	RMP	Work on issues for expert report of Brian Kelley	3	\$725	\$ 2,175.00
2019-12-06	LCF	Continue to work on banking expert report, including analyze and outline thoughts regarding whether to send additional documents to Mr. Kelley	0.1	\$425	\$ 42.50
2019-12-09	RMP	Gather materials for Brian Kelley expert work	2	\$725	\$ 1,450.00
2019-12-10	LPL	E-mail to expert Brian Kelly re: additional materials for him to review for his expert opinion	0.4	\$465	\$ 186.00
2019-12-10	MLS	Conf. call w R. Paul and B. Kelly re expert report; review draft report	0.7	\$800	\$ 560.00
2019-12-10	RMP	Work on materials for expert Brian Kelley; phone call with Brian Kelley	3	\$725	\$ 2,175.00
2019-12-12	NS	Compiling cap sheets to be sent to Brian Kelley	0.8	\$415	\$ 332.00
2019-12-12	MLS	Meeting w/ banking expert Brian Kelley and R. Paul in O.C.; travel home from O.C.	9	\$800	\$ 7,200.00

2019-12-12	RMP	Work with expert Brian Kelley; travel to and from Newport Beach to meet with Brian Kelley; work on his expert report; review correspondence	11	\$725	\$ 7,975.00
2019-12-14	RMP	Phone call with expert Brian Kelley	0.4	\$725	\$ 290.00
2019-12-14	MLS	Tel. call w R. Paul and B. Kelly re expert report issues; analyze same	0.7	\$800	\$ 560.00
2019-12-15	LCF	Assist with expert report of Mr. Kelley, including review revised draft and outline thoughts regarding additional edits	1	\$425	\$ 425.00
2019-12-15	RMP	Review and comment on draft expert report of Brian Kelley	3	\$725	\$ 2,175.00
2019-12-16	LCF	Continue to work on Mr. Kelley's banking standards expert report, including correspond with him regarding draft report and information to include; as well as locate and send relevant documents to him; and work to research questions regarding amount Wells Fargo received through Home Affordable Modification Program and other facts for Mr. Kelley; instruct Mr. Leyh regarding attempting to locate information	1.7	\$425	\$ 722.50
2019-12-16	RMP	Review expert reports; conference call with Brian Kelley	1.7	\$725	\$ 1,232.50
2019-12-16	MLS	Work on Kelly expert report; conf. call re same	2.2	\$800	\$ 1,760.00
2019-12-17	LCF	Continue to work on banking expert witness report, including begin to review revised report from Mr. Kelley; as well as continue to research question regarding amount Wells Fargo received from Home Affordable Modification Program; send additional documents to Mr. Kelley and correspond with him regarding changes to report and Home Affordable Modification Program payments	0.7	\$425	\$ 297.50
2019-12-17	RMP	Review and comment on expert report	1.5	\$725	\$ 1,087.50

2019-12-17	NRL	Continued researching amount of funds Wells Fargo received through Home Affordable Modification Program participation; research various Troubled Asset Relief Program and Treasury reports and document my findings	1.8	\$275	\$ 495.00
2019-12-17	MLS	Work on Kelly expert report and tel. calls re same	3	\$800	\$ 2,400.00
2019-12-18	MLS	Work on Kelley expert report; tel. calls w R. Paul, L. Lam, and B. Kelly re same	1.2	\$800	\$ 960.00
2019-12-18	NRL	Continue research on Home Affordable Modification Program funds received by Wells Fargo; continued searching for supporting documents of the documents found yesterday; redefined the scope of searches to find further information on Wells Fargo funds relating to Home Affordable Modification Program	1.5	\$275	\$ 412.50
2019-12-18	LCF	Review and edit final report for Mr. Kelley	2.3	\$425	\$ 977.50
2019-12-18	RMP	Work with expert Kelley to finalize report and gather information	2.8	\$725	\$ 2,030.00
2019-12-18	LPL	Edit and finalize expert reports of Dan Salah and Brian Kelley	3.4	\$465	\$ 1,581.00
2020-01-03	RMP	Review and analyze Wells Fargo's expert reports; evaluate potential rebuttal reports	0.4	\$725	\$ 290.00
2020-01-03	LCF	Begin to review and analyze Peter Ross' expert report, Wells Fargo's banking expert, including outline thoughts regarding cross-examination and potential points for rebuttal report, as well as research various sources cited by Mr. Ross	2.3	\$425	\$ 977.50
2020-01-04	RMP	Review and analyze Wells Fargo's expert reports	1.7	\$725	\$ 1,232.50

2020-01-06	LCF	Continue to analyze potential rebuttal report for Mr. Kelley including outline and analyze thoughts regarding same with Mr. Paul; review initial draft rebuttal from Mr. Kelley, call with Mr. Kelley regarding his initial draft and general thoughts regarding Wells Fargo's expert report, send additional documents to Mr. Kelley after call	1	\$425	\$ 425.00
2020-01-06	LPL	Draft subpoenas/document requests to Wells Fargo's expert witnesses	1.9	\$465	\$ 883.50
2020-01-06	MLS	Review Ross report; emails re expert depositions and discovery	2.2	\$800	\$ 1,760.00
2020-01-07	MLS	Review Ross expert report	0.5	\$800	\$ 400.00
2020-01-07	MLS	Work on Kelley rebuttal report; tel. call w R. Paul re same	1.2	\$800	\$ 960.00
2020-01-07	RMP	Review proposed addendum to Kelley Report	1.6	\$725	\$ 1,160.00
2020-01-08	RMP	Work on rebuttal report from Kelley	0.4	\$725	\$ 290.00
2020-01-08	MLS	Work on Kelley rebuttal report; tel. call w R. Paul re same	0.7	\$800	\$ 560.00
2020-01-08	JJB	Call with co-counsel re expert rebuttal reports	0.8	\$580	\$ 464.00
2020-01-08	LCF	Continue to work on rebuttal expert report for Mr. Kelley, including proofread, edit, and otherwise revise draft from Mr. Kelley; correspond with Mr. Kelley regarding revisions and specific questions	0.9	\$425	\$ 382.50
2020-01-09	LPL	Finalize and serve expert deposition and document subpoenas	0.7	\$465	\$ 325.50
2020-01-09	LCF	Assist with finalizing rebuttal expert report for Mr. Kelley, including review, proofread/analyze, and provide edits to revised draft from Mr. Kelley; analyze specific questions and edits, incorporate various revisions, and circulate proposed final draft	1.2	\$425	\$ 510.00
2020-01-09	RMP	Work on expert rebuttal reports	1.5	\$725	\$ 1,087.50
2020-01-09	MLS	Work on Kelley rebuttal expert report	2.5	\$800	\$ 2,000.00
2020-01-09	LPL	Further edits to and finalize Dan Salah and Brian Kelley's expert rebuttal reports	5.3	\$465	\$ 2,464.50
		Project Total:	99.7		\$ 64,632.00

Project: Deposition of Dan Pfeil					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-05	LCF	Assist with preparations for deposition of Mr. Pfeil, including call with Mr. Bloomfield to review and outline documents and information relevant to Mr. Pfeil and specific categories of information about which to potentially inquire	0.2	\$425	\$ 85.00
2019-11-11	JJB	Review documents and prepare for deposition of D. Pfeil	2.9	\$580	\$ 1,682.00
2019-11-12	NS	Preparing potential exhibits for review	1.4	\$415	\$ 581.00
2019-11-12	NS	Preparing depo exhibits	2.7	\$415	\$ 1,120.50
2019-11-13	JJB	Review documents and outline in preparation for deposition of D. Pfeil	1.7	\$580	\$ 986.00
2019-11-13	JJB	Travel to Los Angeles for depositions of D. Pfeil and S. Crawford	3	\$580	\$ 1,740.00
2019-11-14	JJB	Finalize preparations for deposition of D. Pfeil	2.2	\$580	\$ 1,276.00
2019-11-14	JJB	Take deposition of D. Pfeil	3	\$580	\$ 1,740.00
2019-11-25	LCF	Review rough draft of transcript and outline preliminary thoughts regarding facts learned through deposition of Dan Pfeil	0.4	\$425	\$ 170.00
		Project Total:	17.5		\$ 9,380.50
Project: Deposition of Susan Crawford					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-05	LCF	Assist with preparations for deposition of Ms. Crawford, including call with Mr. Bloomfield to review and outline documents and information relevant to Ms. Crawford and specific categories of information about which to potentially inquire	0.2	\$425	\$ 85.00
2019-11-12	LCF	Receive update regarding Wells Fargo's production and its upload to Everlaw, draft update to Mr. Bloomfield regarding documents uploaded related to Ms. Crawford in light of her deposition this week,	0.1	\$425	\$ 42.50
2019-11-12	JJB	Review documents and prepare for deposition of S. Crawford	2.8	\$580	\$ 1,624.00

2019-11-13	JJB	Review documents and outline in preparation for deposition of S. Crawford	2	\$580	\$ 1,160.00
2019-11-14	JJB	Finalize preparations for deposition of S. Crawford	2.5	\$580	\$ 1,450.00
2019-11-14	JJB	Return travel from Los Angeles to Oakland following depositions of D. Pfeil and S. Crawford	3	\$580	\$ 1,740.00
2019-11-14	JJB	Take deposition of S. Crawford	3.5	\$580	\$ 2,030.00
2019-11-17	LCF	Correspond with Mr. Bloomfield regarding depositions of Ms. Crawford and Mr. Pfeil, including information learned	0.1	\$425	\$ 42.50
2019-11-25	LCF	Review rough draft of transcript and outline preliminary thoughts regarding facts learned through deposition of Susan Crawford	0.8	\$425	\$ 340.00
2019-11-30	RMP	Prepare proof chart for trial; review deposition of Susan Crawford	1	\$725	\$ 725.00
		Project Total:	16		\$ 9,239.00

Project: Motion for leave to file third amended complaint

Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-16	MLS	Tel. call w J. Bloomfield and new class rep; work on motion to amend; tel. call w R. Paul re class cert, trial plan; tel. calls w L. Lam re class cert plan; legal research re remedies--review C. Rosler email re same	2	\$800	\$ 1,600.00
2019-11-18	JJB	Research, draft and revise motion for leave to file third amended complaint	7.2	\$580	\$ 4,176.00
2019-11-19	JJB	Draft proposed order granting motion to amend	0.4	\$580	\$ 232.00
2019-11-19	JJB	Draft Campos declaration in support of motion to amend	0.7	\$580	\$ 406.00
2019-11-19	JJB	Calls with proposed class representative Sandra Campos	0.8	\$580	\$ 464.00
2019-11-19	MLS	Work on motion to amend and conf. w Team re same	3	\$800	\$ 2,400.00
2019-11-19	JJB	Draft and revise motion for leave to file third amended complaint	5.6	\$580	\$ 3,248.00
2019-11-20	JJB	Finalize Campos declaration re motion to amend	0.3	\$580	\$ 174.00

2019-11-20	JJB	Calls with proposed class representative Sandra Campos	0.6	\$580	\$ 348.00
2019-11-20	MLS	Work on motion to amend and Conf. w Team re same	2	\$800	\$ 1,600.00
2019-11-20	JJB	Revise and finalize motion for leave to file third amended complaint	3.2	\$580	\$ 1,856.00
2019-11-21	LPL	Confer with J. Bloomfield and legal secretary re: filing motion for leave to file third amended complaint	0.2	\$465	\$ 93.00
2019-11-21	MLS	Finalize and file motion to amend	1.5	\$800	\$ 1,200.00
2019-11-21	JJB	Finalize documents and file motion for leave to file third amended complaint	1.9	\$580	\$ 1,102.00
2019-12-05	MLS	Review motion to amend opp. and discuss w/ R. Paul	1.7	\$800	\$ 1,360.00
2019-12-06	MLS	Review opp. to motion to amend; conf. w R. Paul and J. Bloomfield re same	1.8	\$800	\$ 1,440.00
2019-12-10	MLS	Review/edit reply brief on motion to amend	1.5	\$800	\$ 1,200.00
2019-12-11	LPL	E-mails with team re: draft reply brief in support of motion for leave to add Campos as a named plaintiff	0.2	\$465	\$ 93.00
2019-12-12	RMP	Draft reply in support of motion for leave to amend complaint	1	\$725	\$ 725.00
2019-12-12	MLS	Work on reply brief to motion to amend	2.5	\$800	\$ 2,000.00
2020-01-10	LPL	Call with co-counsel L. Fellows re: planning for next week's court hearing on motion to amend complaint	0.2	\$465	\$ 93.00
2020-01-10	LPL	Begin reviewing briefing on motion for leave to amend in preparation for hearing on motion	1.4	\$465	\$ 651.00
2020-01-12	LPL	Prep for hearing on motion for leave to amend complaint	1.9	\$465	\$ 883.50
2020-01-13	LPL	Continue preparing for hearing on motion for leave to amend to add Campos as a named plaintiff	3.3	\$465	\$ 1,534.50
2020-01-14	LPL	Prep for hearing on motion for leave to amend complaint	2.4	\$465	\$ 1,116.00
		Project Total:	47.3		\$ 29,995.00

Project: Deposition of Kara Reimers					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-08	LCF	Review deposition notices for Ms. Crawford and Mr. Pfeil; analyze deposition of Ms. Reimers and scheduling of the same; outline thoughts regarding timing and circulate to the team	0.2	\$425	\$ 85.00
2019-11-12	LCF	Begin to review and analyze custodians produced and review of documents in advance of Ms. Reimers' deposition	0.1	\$425	\$ 42.50
2019-11-12	LCF	Continue to work on scheduling of Ms. Reimer's deposition, including correspond with Ms. Brinson regarding date and location for the same	0.2	\$425	\$ 85.00
2019-11-13	LCF	Finalize deposition notice for Ms. Reimers' deposition, email same to Wells Fargo's counsel	0.1	\$425	\$ 42.50
2019-11-13	LCF	Begin to prepare for deposition of Ms. Reimers, including begin to review documents marked "hot" related to her and instruct Mr. Neal regarding printing same; begin to review documents marked "warm" for Ms. Reimers	0.3	\$425	\$ 127.50
2019-11-13	RPN	Draft Kara Reimers deposition notice	0.3	\$230	\$ 69.00
2019-11-13	RMP	Prepare for Reimers deposition; work on arguments for class certification	1	\$725	\$ 725.00
2019-11-14	LCF	Continue to prepare for Ms. Reimers' deposition, including begin to outline preliminary thoughts regarding potential topics to discuss	0.2	\$425	\$ 85.00
2019-11-15	RPN	Prepare potential exhibits for the deposition of Kara Reimers	2	\$230	\$ 460.00
2019-11-18	RPN	Prepare potential exhibits for the deposition of Kara Reimers	1.9	\$230	\$ 437.00

2019-11-18	LCF	Continue to prepare for deposition of Kara Reimers, including begin to review and analyze potential deposition exhibits from documents marked "hot" and "warm" related to Ms. Reimers, review documents recently produced by Wells Fargo related to Ms. Reimers that have not yet been subjectively coded, correspond with Mr. Bloomfield regarding facts learned at recent depositions of Mr. Pfeil and Ms. Crawford and whether any overlap with upcoming deposition, send preliminary list of exhibits to be prepared to Mr. Neal, and begin to draft deposition outline	5.7	\$425	\$ 2,422.50
2019-11-19	RPN	Prepare potential exhibits for the deposition of Kara Reimers	3.1	\$230	\$ 713.00
2019-11-19	LCF	Continue to prepare for deposition of Kara Reimers, including finish review and analysis of potential deposition exhibits from documents marked "hot" and "warm" related to Ms. Reimers, send final list of exhibits to be prepared to Mr. Neal, and continue to draft deposition outline; drive to Des Moines for Ms. Reimers' deposition	7.4	\$425	\$ 3,145.00
2019-11-20	LCF	Take deposition of Kara Reimers; including finalize preparations and outline; and travel back to Kansas City from Des Moines	11.3	\$425	\$ 4,802.50
2019-11-22	LCF	Summarize facts and information learned from Ms. Reimers' deposition, including locate documents reviewed in preparation for her deposition, and send summary of her deposition to the team	0.8	\$425	\$ 340.00
		Project Total:	34.6		\$ 13,581.50

Project: Deposition of Craig Enis					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-02	LPL	Calls with class member Craig Enis re: WF's subpoena for his deposition and case status; send him representation agreement	0.6	\$465	\$ 279.00
2019-12-03	LPL	Call with class member Craig Enis re: questions about our representation agreement and prep for his upcoming deposition	0.4	\$465	\$ 186.00
2019-12-08	LPL	Review and analyze client Craig Enis's documents for production	0.5	\$465	\$ 232.50
2019-12-09	LPL	Review and produce Craig Enis's documents	0.4	\$465	\$ 186.00
2019-12-09	LPL	Depo prep meetings with clients Charles Gomez and Craig Enis	3.9	\$465	\$ 1,813.50
2019-12-09	JBK	Depo prep sessions w/LPL and Craig and Charles. Review case documents to prep for depositions. c/w LPL re same. Prep and file notice of appearance.	5.9	\$415	\$ 2,448.50
		Project Total:	11.7		\$ 5,145.50
Project: Deposition of Sandra Campos					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-05	NRL	Discussed new project involving document review for production related to proposed California class representative Campos; began reviewing Campos production for irrelevant, duplicated, or questionable documents; created notes concerning which documents fit the suggested categories and added to notes while reviewing	5.1	\$275	\$ 1,402.50
2019-12-06	LCF	Continue to prepare to defend depositions of proposed, additional California class representatives, Mr. and Mrs. Campos, including preparation call with Ms. Campos, and send follow-up correspondence to Ms. Campos	1.9	\$425	\$ 807.50

2019-12-06	NRL	Continued reviewing Campos production and taking notes regarding the importance of documents and organize by relevancy of documents	3.8	\$275	\$ 1,045.00
2019-12-07	LCF	Continue to prepare for deposition of Mr. and Mrs. Campos, including continue to gather and review relevant documents for the same	0.5	\$425	\$ 212.50
2019-12-08	LCF	Continue to prepare for deposition of new California plaintiff, Ms. Campos, including review, analyze, and outline thoughts regarding documents produced in preparation for meeting with Mr. and Mrs. Campos	3	\$425	\$ 1,275.00
2019-12-09	LCF	Travel from Kansas City to Los Angeles for various depositions of California plaintiffs; continue to review and outline thoughts regarding documents for Mr. and Mrs. Campos in preparation for their depositions; meet with Mr. and Mrs. Campos to prepare for their depositions	8.1	\$425	\$ 3,442.50
2019-12-10	LCF	Analyze result of Ms. Campos deposition and general next steps; outline thoughts regarding defending remaining California plaintiff depositions and covering the same	0.5	\$425	\$ 212.50
2019-12-10	MLS	Tel. call w R. Paul re Campos depo; tel. call w L. Lam re depos	0.5	\$800	\$ 400.00
2019-12-10	LCF	Defend deposition of Sandra Campos, including finish preparing with her before her deposition and briefly discuss next steps after her deposition completed	9	\$425	\$ 3,825.00
		Project Total:	32.4		\$ 12,622.50
Project: Deposition of Jameel Hayden					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-27	LCF	Correspond with Jameel Hayden regarding status of scheduling his deposition and preparations for the same; send follow-up email confirming call and next steps	0.3	\$425	\$ 127.50

2019-12-04	LCF	Correspond with Mr. Hayden re upcoming deposition and begin preparations for the same; send him follow-up email regarding meeting in person to prepare	0.5	\$425	\$ 212.50
2019-12-05	LPL	Review Jameel Hayden's document production and draft privilege log	0.4	\$465	\$ 186.00
2019-12-05	LCF	Continue to prepare for California class member Jameel Hayden's deposition, including review and analyze documents produced regarding Mr. Hayden, as well as analyze question regarding types of contracts for those identified as "private investors," and begin to work on producing documents from Mr. Hayden	3.3	\$425	\$ 1,402.50
2019-12-06	LCF	Prepare for deposition of California class member, Mr. Hayden, including begin to review documents from loan file	1	\$425	\$ 425.00
2019-12-06	RPN	Prepare potential deposition preparation documents for Mr. Hayden	1	\$230	\$ 230.00
2019-12-06	LCF	Prepare Mr. Hayden's documents for production in advance of his deposition, including review and analyze whether various documents responsive to subpoena to him, review final documents, draft privilege log for documents withheld and/or redacted, and send final production to Wells Fargo	1.1	\$425	\$ 467.50
2019-12-06	NRL	Review and analyze Hayden relevant documents and irrelevant documents	2.4	\$275	\$ 660.00
2019-12-07	LCF	Continue to prepare for deposition of Mr. Hayden, including continue to gather and review relevant documents for the same	0.5	\$425	\$ 212.50
2019-12-08	LCF	Continue to prepare for deposition of Mr. Hayden, including review, analyze, and outline thoughts regarding documents produced in preparation for meeting Mr. Hayden	1.4	\$425	\$ 595.00

2019-12-09	LCF	Meet with Mr. Hayden to prepare for his deposition	3	\$425	\$ 1,275.00
2019-12-11	LCF	Defend deposition of Mr. Hayden, including meet with him before to finish preparing and discuss deposition and next steps	8.8	\$425	\$ 3,740.00
		Project Total:	23.7		\$ 9,533.50
Project: Deposition of Derrick Cannon					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-01	LCF	Correspond with Mr. Cannon regarding date for his deposition and meeting in advance to prepare for the same	0.1	\$425	\$ 42.50
2020-01-06	LCF	Work on preparing for Mr. Cannon's deposition, including attempt to contact him to schedule time to prepare and discuss documents requested by Wells Fargo, send follow-up email; correspond with Wells Fargo's counsel, Shawn Obi, to follow-up regarding request to move location of Mr. Cannon's deposition	0.2	\$425	\$ 85.00
2020-01-07	LCF	Review voicemail from Mr. Cannon returning call late last night to discuss deposition preparation, draft and send follow-up correspondence requesting to speak today	0.1	\$425	\$ 42.50
2020-01-08	LCF	Continue to prepare for deposition of California plaintiff, Derrick Cannon, including review, analyze, and cull initial documents pulled by Mr. Leyh regarding Mr. Cannon; draft and send follow-up email to Mr. Cannon requesting time to talk regarding his upcoming deposition; and correspond with Mr. Cannon regarding setting time to meet to prepare for his deposition and documents requested by Wells Fargo; draft and send correspondence to Ms. Obi confirming location, Riverside, and start time for Mr. Cannon's deposition	2.2	\$425	\$ 935.00

2020-01-09	LCF	Continue to prepare for deposition of California plaintiff Derrick Cannon, including send follow-up email to Mr. Cannon outlining meeting to prepare as well as confirming documents for which he needs to search; continue to review documents from Mr. Cannon's loan file, including review lengthy loan notes in preparation to meet with Mr. Cannon for his deposition	0.9	\$425	\$ 382.50
2020-01-10	LCF	Continue to prepare for deposition of Mr. Cannon, including review and analyze documents provided by Mr. Cannon in response to Wells Fargo's subpoena, work with Mr. Neal to prepare and produce the same to Wells Fargo; as well as continue to review documents for Mr. Cannon and gather any additional documents needed to prepare with Mr. Cannon	1.6	\$425	\$ 680.00
2020-01-11	LCF	Continue to review, analyze, and outline thoughts and questions regarding Mr. Cannon's documents in preparation for meeting with him to prepare for his deposition	2.5	\$425	\$ 1,062.50
2020-01-12	LCF	Travel to Riverside from Kansas City to defend deposition of California plaintiff, Derrick Cannon; including review, analyze, and outline thoughts and questions regarding selected documents from Mr. Cannon's loan file to prepare for meeting with Mr. Cannon; and meet with Mr. Cannon to prepare for his deposition	9.8	\$425	\$ 4,165.00
2020-01-13	LCF	Defend deposition of California plaintiff Derrick Cannon; including meet with him before deposition to finalize preparations and briefly meet with him after to discuss next steps; and draft summary of deposition and facts learned and circulate to the team	9	\$425	\$ 3,825.00
		Project Total:	26.4		\$ 11,220.00

Project: Deposition of Charles Gomez					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-10	LPL	Review and finalize Charles Gomez's documents for production to Wells Fargo	0.7	\$465	\$ 325.50
2019-12-12	LPL	Defend deposition of CA class member Charles Gomez	7.2	\$465	\$ 3,348.00
		Project Total:	7.9		\$ 3,673.50
Project: Deposition of Cathaline Gonzalez					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-11	LPL	Prep and defend CA class member Cathaline Gonzalez's deposition	6.2	\$465	\$ 2,883.00
		Project Total:	6.2		\$ 2,883.00
Project: Deposition of Jerry de la Cruz					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-10	LPL	Meet with CA class members Jerry Dela Cruz and Craig Enis; defend their depositions in SF	5	\$465	\$ 2,325.00
2019-12-10	JBK	Travel, prep for, and depo of Jerry Dela Cruz. Discuss strategy re depos w/LPL.	5.4	\$415	\$ 2,241.00
		Project Total:	10.4		\$ 4,566.00
Project: Deposition of Martha Montenegro					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-13	LPL	Call with class member Martha Montenegro's daughter re: background on the case and scheduling her deposition for January	0.4	\$465	\$ 186.00
2020-01-04	JJB	Email to class member M. Montenegro	0.2	\$580	\$ 116.00
2020-01-04	LPL	E-mails with class member Martha Montenegro's daughter re: deposition and deposition prep	0.2	\$465	\$ 93.00
2020-01-12	JJB	Review documents in preparation for M. Montenegro deposition	2.3	\$580	\$ 1,334.00
2020-01-12	JJB	Travel to Los Angeles for California class member depositions	3.3	\$580	\$ 1,914.00
2020-01-13	JJB	Meet with M. Montenegro and Z. Pineda in preparation for deposition of M. Montenegro	1.8	\$580	\$ 1,044.00
2020-01-13	JJB	Defend deposition of M. Montenegro	6.5	\$580	\$ 3,770.00

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2020-01-14	JJB	Emails with co-counsel re deposition of M. Montenegro	0.3	\$580	\$ 174.00
2020-01-14	JJB	Emails with Wells Fargo counsel re upcoming depositions	0.4	\$580	\$ 232.00
2020-01-14	JJB	Draft and circulate M. Montenegro deposition summary	0.7	\$580	\$ 406.00
		Project Total:	16.1		\$ 9,269.00
Project: Deposition of Jose Chavez					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-15	JJB	Review and analyze documents in preparation for J. Chavez depo	0.5	\$580	\$ 290.00
2020-01-15	JJB	Emails with co-counsel re J. Chavez depo	0.6	\$580	\$ 348.00
2020-01-15	JJB	Meet with J. Chavez in preparation for deposition	2	\$580	\$ 1,160.00
2020-01-15	JJB	Review and analyze documents in preparation for J. Chavez depo	2.7	\$580	\$ 1,566.00
2020-01-16	JJB	Meet with J. Chavez in preparation for deposition	1.1	\$580	\$ 638.00
2020-01-16	JJB	Defend deposition of J. Chavez	6.8	\$580	\$ 3,944.00
2020-01-21	JJB	Draft and circulate J. Chavez deposition summary	0.6	\$580	\$ 348.00
		Project Total:	14.3		\$ 8,294.00
Project: Deposition of Kimberly Gladman					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-10	LCF	Correspond with Ms. Gladman regarding subpoena from Wells Fargo for her deposition and next steps	0.3	\$425	\$ 127.50
2019-12-30	LCF	Correspond with Ms. Gladman regarding her upcoming deposition, confirming date, and next steps to schedule time to prepare	0.1	\$425	\$ 42.50
2019-12-31	LCF	Continue to correspond with Ms. Gladman regarding her upcoming deposition and scheduling deposition preparation call	0.1	\$425	\$ 42.50
2019-12-31	LCF	Work on preparations for Ms. Gladman's deposition	0.1	\$425	\$ 42.50
2020-01-01	JJB	Review documents in preparation for K. Gladman deposition	1.2	\$580	\$ 696.00
2020-01-02	JJB	Call with L. Fellows and K. Gladman re upcoming deposition	0.3	\$580	\$ 174.00

2020-01-02	LCF	Assist with preparing Ms. Gladman for her deposition, including participate in initial deposition preparation call with Ms. Gladman and Mr. Bloomfield; assist with scheduling further deposition preparation call with Ms. Gladman; review notes and facts learned from mediation with Ms. Gladman, summarize the same, and send to Mr. Bloomfield for further deposition preparations	1.3	\$425	\$ 552.50
2020-01-02	JJB	Review K. Gladman file in preparation for deposition	2.1	\$580	\$ 1,218.00
2020-01-02	JJB	Travel to Orange County from Oakland for K. Gladman deposition	3.8	\$580	\$ 2,204.00
2020-01-03	JJB	Meet with K. Gladman in preparation for her deposition	1	\$580	\$ 580.00
2020-01-03	JJB	Review documents in preparation for K. Gladman deposition	1.5	\$580	\$ 870.00
2020-01-03	JJB	Return travel to Oakland from Orange County	3.1	\$580	\$ 1,798.00
2020-01-03	JJB	Defend K. Gladman deposition	5.9	\$580	\$ 3,422.00
2020-01-06	JJB	Draft and circulate K. Gladman deposition summary	0.5	\$580	\$ 290.00
2020-01-06	LCF	Review update from Mr. Bloomfield regarding Ms. Gladman's deposition and facts learned; call with Ms. Gladman to review her deposition, her thoughts regarding same, and case next steps	0.6	\$425	\$ 255.00
		Project Total:	21.9		\$ 12,314.50
Project: Deposition of Anna Schulke					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-08	LCF	Work on deposition of Ms. Schulke; confirm availability and preparations needed	0.1	\$425	\$ 42.50
2020-01-09	LCF	Assist with preparations for deposition of California class member, Anna Schulke, including meet with Mr. Leyh to review documents and information to gather to prepare with Ms. Schulke	0.4	\$425	\$ 170.00

2020-01-09	NRL	Begin deposition preparation for California class member Anna Schulke, including research client's loan file to prepare chronology for deposition preparation	0.4	\$275	\$ 110.00
2020-01-10	LCF	Assist with preparations for deposition of Ms. Schulke, including work with Mr. Leyh and Mr. Bloomfield to arrange travel for Ms. Schulke from Ohio to Kansas City; as well as participate in initial call with Ms. Schulke, Mr. Leyh, and Mr. Bloomfield to convey travel arrangements and set up deposition preparations when she is in Kansas City	0.5	\$425	\$ 212.50
2020-01-13	NRL	Emailed and called client about upcoming deposition and attempted to schedule preparation call; began reviewing client's loan file to research for deposition; constructed simple chronology; coded and made notes on various documents from client's loan file; downloaded key or relevant documents from client's loan file for further review	5.7	\$275	\$ 1,567.50
2020-01-14	LCF	Assist with preparations for deposition of Ms. Schulke, including correspond with Mr. Leyh regarding additional information needed to prepare and thoughts regarding potential next steps to prepare	0.4	\$425	\$ 170.00
2020-01-14	NRL	Continued researching and reviewing Ms. Schulke's loan file information; spoke to client and discussed upcoming deposition and preparation	5.6	\$275	\$ 1,540.00
2020-01-15	NRL	Set up preparation phone call with Ms. Schulke; continued to examine loan file for upcoming deposition	1.7	\$275	\$ 467.50

2020-01-17	LCF	Lead deposition preparation call with Ms. Schulke and Mr. Schulke; review initial documents gathered by Mr. Leyh in preparation to meet with Ms. Schulke for her deposition, provide edits and feedback regarding additional documents needed and specific factual questions to review with Ms. Schulke	2.3	\$425	\$ 977.50
2020-01-17	NRL	Prepped for client phone call; called client; analyzed relevant loan file documents; sent email and left voicemail with client concerning document requests in deposition notice	6.2	\$275	\$ 1,705.00
2020-01-20	LCF	Continue to assist with preparations for deposition of Ms. Schulke, including update Mr. Paul regarding preparations and specific facts; and assist Mr. Leyh regarding gathering and producing documents responsive to Wells Fargo's subpoena, review documents gathered prepare to finalize documents for production and additional follow-up needed for production as well as meet with Mr. Leyh to outline additional facts to discuss with Ms. Schulke as part of her in person preparations	0.8	\$425	\$ 340.00
2020-01-20	RMP	Prepare for deposition of Anna Schulke	0.8	\$725	\$ 580.00
2020-01-20	NRL	Continued to review notes and comments concerning client's loan file; worked on objection protocol and standing order; reviewed deposition preparation outline	4.8	\$275	\$ 1,320.00
2020-01-21	RMP	Prepare for deposition of Schulke	0.8	\$725	\$ 580.00

2020-01-21	NRL	Reviewed deposition preparation documents; added to client deposition chronology; reviewed deposition preparation outline and made modifications specific to client's circumstances; reviewed previous depositions of similar clients to aid in preparation and to prepare to defend client	7.6	\$275	\$ 2,090.00
2020-01-22	RMP	Prepare and help produce Ms. Schulke for deposition	2.5	\$725	\$ 1,812.50
2020-01-22	NRL	Continued prepping for deposition by reviewing documents; defended client in deposition; and meeting with client; debriefed client after the deposition	10	\$275	\$ 2,750.00
		Project Total:	50.6		\$ 16,435.00
Project: Deposition of Jason Hewitt					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-07	JJB	Emails with Wells Fargo counsel	0.3	\$580	\$ 174.00
2020-01-07	JJB	Review and analyze documents in preparation for deposition of J. Hewitt	2.8	\$580	\$ 1,624.00
2020-01-08	JJB	Travel to Medford, OR from Oakland, CA for J. Hewitt deposition	3.6	\$580	\$ 2,088.00
2020-01-09	JJB	Meeting with California class member J. Hewitt in preparation for his deposition	1.2	\$580	\$ 696.00
2020-01-09	JJB	Return travel from Medford, OR to Oakland, CA	3.3	\$580	\$ 1,914.00
2020-01-09	JJB	Defend deposition of J. Hewitt	5.1	\$580	\$ 2,958.00
		Project Total:	16.3		\$ 9,454.00
Project: Deposition of Joe Plescia					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-15	JJB	Call with California class member J. Plescia	0.5	\$580	\$ 290.00
2020-01-16	JJB	Review and analyze documents in preparation for J. Plescia depo	1.7	\$580	\$ 986.00
2020-01-17	JJB	Meet with J. Plescia and V. Plescia in preparation for J. Plescia deposition	2	\$580	\$ 1,160.00
2020-01-17	JJB	Return travel to Oakland following J. Plescia deposition	4.2	\$580	\$ 2,436.00
2020-01-17	JJB	Defend deposition of J. Plescia	5.4	\$580	\$ 3,132.00

2020-01-21	JJB	Draft and circulate J. Plescia deposition summary	0.5	\$580	\$ 290.00
		Project Total:	14.3		\$ 8,294.00
Project: Deposition of Elizabeth Messana					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-23	JJB	Emails with Wells Fargo counsel	0.4	\$580	\$ 232.00
2020-01-23	JJB	Review and analyze documents in preparation for E. Messana deposition	3.3	\$580	\$ 1,914.00
2020-01-24	JJB	Meet with E. Messana	0.5	\$580	\$ 290.00
2020-01-24	JJB	Draft and circulate summary of E. Messana deposition	0.6	\$580	\$ 348.00
2020-01-24	JJB	Defend deposition of E. Messana	5.2	\$580	\$ 3,016.00
		Project Total:	10		\$ 5,800.00
Project: Deposition of Hortensia Torres					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-27	JJB	Review and analyze documents in preparation for H. Torres deposition	2.3	\$580	\$ 1,334.00
2020-01-27	JJB	Travel to Los Angeles from Oakland for H. Torres deposition	3.6	\$580	\$ 2,088.00
2020-01-28	JJB	Meet with class member H. Torres prior to her deposition	1	\$580	\$ 580.00
2020-01-28	JJB	Defend deposition of H. Torres	8.7	\$580	\$ 5,046.00
2020-01-29	JJB	Draft and circulate summary of H. Torres deposition	0.7	\$580	\$ 406.00
2020-01-29	JJB	Return travel to Oakland after H. Torres deposition	3.6	\$580	\$ 2,088.00
		Project Total:	19.9		\$ 11,542.00
Project: Deposition of Dino Paris					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-19	LPL	Confer with M. Schrag and client Debora Granja regarding deposition of Granja's therapist	0.5	\$465	\$ 232.50
2019-12-20	LPL	E-mails with team regarding deposition of Plaintiff Granja's therapist	0.4	\$465	\$ 186.00
2019-12-24	LPL	E-mail to defense counsel regarding deposition of Dino Paris	0.2	\$465	\$ 93.00
2020-01-03	LPL	Call with Debora Granja's therapist Dino Paris regarding his upcoming deposition	0.2	\$465	\$ 93.00

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2020-01-10	LPL	Review and analyze J. Bloomfield's report on deposition of Dino Paris (Debora Granja's therapist)	0.1	\$465	\$ 46.50
2020-01-10	JJB	Emails with Wells Fargo counsel	0.3	\$580	\$ 174.00
2020-01-10	JJB	Draft and circulate D. Paris deposition summary	0.6	\$580	\$ 348.00
2020-01-10	JJB	Review documents in preparation for deposition of D. Paris	1.6	\$580	\$ 928.00
2020-01-10	JJB	Attend deposition of client therapist D. Paris by telephone	3.8	\$580	\$ 2,204.00
		Project Total:	7.7		\$ 4,305.00
Project: Deposition of Alfonso Campos					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-11	LCF	Receive update regarding deposition of Mr. Campos and facts learned	0.2	\$425	\$ 85.00
2019-12-11	RMP	Produce Alfonso Campos for deposition; prepare for meeting with expert Brian Kelley	10	\$725	\$ 7,250.00
		Project Total:	10.2		\$ 7,335.00
Project: Deposition of Cedillos					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-06	RPN	Prepare potential deposition preparation documents for Mr. Cedillos	0.4	\$230	\$ 92.00
2019-12-06	LCF	Prepare for deposition of California class member, Mr. Cedillos, including begin to review documents from loan file	1	\$425	\$ 425.00
2019-12-06	NRL	Review and analyze Cedillos relevant documents and irrelevant documents	1	\$275	\$ 275.00
2019-12-10	RMP	Prepare for class member depositions; appear for deposition of Mr. Cedillos (failed to appear)	2.5	\$725	\$ 1,812.50
		Project Total:	4.9		\$ 2,604.50
Project: Motion to compel various discovery responses (Feb. 2020 hearing)					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-31	JJB	Preliminary research regarding motion to compel deadline	2.4	\$580	\$ 1,392.00
2020-01-01	JJB	Emails with N. Shah	0.3	\$580	\$ 174.00

2020-01-01	JJB	Review and analyze N. Shah research regarding good cause for amending scheduling order	0.6	\$580	\$ 348.00
2020-01-01	NS	Draf summary of legal research regarding discovery arguments	3.9	\$415	\$ 1,618.50
2020-01-02	JJB	Emails with Wells Fargo counsel	0.1	\$580	\$ 58.00
2020-01-02	JJB	Emails with co-counsel	0.2	\$580	\$ 116.00
2020-01-02	JJB	Draft and circulate insert for discovery letter brief	0.5	\$580	\$ 290.00
2020-01-02	NS	Review discovery dispute letter	0.5	\$415	\$ 207.50
2020-01-02	JJB	Discuss with N. Shah and finalize research regarding good cause for extending motion to compel deadline	0.6	\$580	\$ 348.00
2020-01-02	LPL	E-mails with team and confer with M. Schrag regarding deposition scheduling and upcoming motion to compel	1.2	\$465	\$ 558.00
2020-01-02	NS	Legal research regarding discovery arguments	1.8	\$415	\$ 747.00
2020-01-03	NS	Team conference call regarding discovery letter and expert reply report	0.5	\$415	\$ 207.50
2020-01-03	LPL	Conference call with team regarding finalizing discovery letter brief and Wells Fargo's expert reports	0.6	\$465	\$ 279.00
2020-01-03	MLS	Work on discovery letter	0.8	\$800	\$ 640.00
2020-01-03	LPL	Edit and finalize discovery letter brief to court regarding Wells Fargo's refusal to produce certain documents and information	4.7	\$465	\$ 2,185.50
2020-01-09	LPL	E-mails with co-counsel L. Fellows regarding drafting response to discovery letter brief on Mary Coffin deposition	0.2	\$465	\$ 93.00

2020-01-10	LCF	Draft response to Wells Fargo's letter brief to Judge Alsup seeking to avoid production of Ms. Coffin for a deposition, including research and analyze cases cited by Wells Fargo, research additional cases to cite, review, analyze, and outline thoughts regarding documents produced related to Ms. Coffin, circulate initial draft response along with questions and specific thoughts to the team; begin to outline thoughts regarding specific documents to potentially discuss during Ms. Coffin's deposition in the course of reviewing documents for response to letter brief	4.7	\$425	\$ 1,997.50
2020-01-11	RMP	Review recent filings regarding discovery disputes	0.2	\$725	\$ 145.00
2020-01-17	LCF	Participate in meet and confer conference with Wells Fargo's counsel regarding their refusal to answer Plaintiff's discovery and refusal to produce Ms. Coffin	0.3	\$425	\$ 127.50
2020-01-23	LCF	Receive update from Ms. Lam regarding results of further meet and confer with Wells Fargo's counsel and next steps to prepare letter brief for Magistrate Judge Beeler	0.2	\$425	\$ 85.00
2020-01-24	LCF	Begin to draft joint letter briefs to Magistrate Judge Beeler regarding Ms. Coffin's deposition and outstanding discovery issues, including review relevant case management order and revise prior letter briefs to fit the same, review update from Ms. Lam regarding status of discovery issues and resolution of some through further meet and confer	2.4	\$425	\$ 1,020.00

2020-01-25	LCF	Finish draft joint letter briefs regarding Ms. Coffin's deposition and outstanding discovery issues, including research Senator Schatz's correspondence with Wells Fargo and outline thoughts regarding same, circulate draft letter briefs to team	2.5	\$425	\$ 1,062.50
2020-01-27	LCF	Continue to work on draft joint letter briefs regarding Ms. Coffin's deposition and outstanding discovery issues, including review and incorporate proposed edits from Ms. Lam and circulate revised drafts to the team	0.4	\$425	\$ 170.00
2020-01-28	LPL	Call with M. Schrag and L. Fellows regarding editing and finalizing discovery letter briefs to Judge Beeler	0.7	\$465	\$ 325.50
2020-01-28	LCF	Further revise draft letter brief, including revise draft letter to remove exhibits and send revised draft to Mr. Schrag, as well as call with Mr. Schrag and Ms. Lam regarding revisions to letters; revise letter regarding Ms. Coffin, including add additional exhibit and circulate revised draft; review and provide feedback to Ms. Lam regarding revised discovery letter draft and confirm both letters ready to be sent to Wells Fargo	1.7	\$425	\$ 722.50

2020-02-12	LCF	Assist with preparations for discovery conference with Magistrate Judge Beeler regarding Ms. Coffin's deposition and other outstanding discovery items (regarding Veterans Administration error, other errors, and communications with senators), including call with Mr. Bloomfield and Ms. Lam to prepare for conference and outline thoughts and specific documents, send additional documents regarding discovery issues to Mr. Bloomfield for the conference tomorrow; follow-up call with Ms. Lam and Mr. Bloomfield regarding scope of request for Veterans Administration loan documents and potential narrowing of the same, as well as a few additional follow-up questions as part of final hearing preparations	0.8	\$425	\$ 340.00
2020-02-13	LCF	Receive update from Mr. Bloomfield regarding discovery conference with Magistrate Judge Beeler and next steps	0.2	\$425	\$ 85.00
2020-02-17	LCF	Continue to analyze next steps in light of recent discovery conference, including analyze whether to request additional depositions and timing for the same, and draft correspondence regarding same for the team	0.2	\$425	\$ 85.00
2020-02-25	LCF	Analyze outstanding discovery, including depositions and written discovery, including listen to discovery conference with Magistrate Judge Beeler and analyze next steps to follow-up with Wells Fargo regarding discovery outstanding	0.7	\$425	\$ 297.50
		Project Total:	33.9		\$ 15,725.00
Project: Deposition of Wells Fargo Expert Peter Ross					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-24	RMP	Prepare for Ross deposition	0.6	\$725	\$ 435.00
2020-01-28	RMP	Prepare for deposition of Ross	1.4	\$725	\$ 1,015.00

2020-01-29	RMP	Prepare for Ross deposition; analyze case strategy and need for evidence from deposition	0.7	\$725	\$ 507.50
2020-01-29	LCF	Prepare for deposition, including review and analysis of prior cases in which Mr. Ross involved and begin to prepare chart outlining result information from the same	4.3	\$425	\$ 1,827.50
2020-01-30	LCF	Continue to prepare for deposition of Mr. Ross, including continue to review and analyze documents and potential exhibits	2.4	\$425	\$ 1,020.00
2020-01-31	RMP	Prepare for Ross deposition	1.4	\$725	\$ 1,015.00
2020-01-31	LCF	Begin to draft outline for Mr. Ross' deposition, including sections regarding his work history, background, prior cases, and the financial crisis generally; outline and analyze strategy regarding Mr. Ross' deposition and exhibits	5.1	\$425	\$ 2,167.50
2020-02-02	LCF	Continue to prepare for deposition of Mr. Ross, including continue to analyze his report related to the Home Preservation Application error in this case and consent orders, and continue to prepare draft deposition outline	4.5	\$425	\$ 1,912.50
2020-02-03	LPL	Review and analyze WF's response and documents regarding subpoena to expert Peter Ross	0.3	\$465	\$ 139.50
2020-02-03	RMP	Prepare for Peter Ross deposition	4	\$725	\$ 2,900.00
2020-02-03	LCF	Continue to prepare for deposition of Mr. Ross, including finish initial draft deposition outline and preliminarily review draft and additional changes/information needed with Mr. Paul, as well as locate additional, potential exhibits regarding the calculation error; review Wells Fargo's response to subpoena regarding Mr. Ross	7.7	\$425	\$ 3,272.50
2020-02-04	LCF	Continue to prepare for deposition, including work with Mr. Neal to finalize exhibits and review final exhibit copies to confirm ready to be sent	1	\$425	\$ 425.00
2020-02-04	RMP	Prepare for deposition of Peter Ross	2.5	\$725	\$ 1,812.50

2020-02-05	LCF	Continue to assist with preparations for deposition of Wells Fargo's purported banking expert, Peter Ross; outline and analyze additional, potential exhibits related to loss mitigation and other documents, locate the same; review and provide feedback regarding changes to draft deposition outline and overall strategy	3.8	\$425	\$ 1,615.00
2020-02-05	RMP	Prepare for deposition of Peter Ross	7	\$725	\$ 5,075.00
2020-02-06	RMP	Prepare for and depose Peter Ross; return travel to Kansas City; designate deposition testimony of Kara Reimers for trial; work on motion for partial summary judgment	11.3	\$725	\$ 8,192.50
		Project Total:	58		\$ 33,332.00
Project: Response to Coordes plaintiffs' motion to consolidate					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-14	LCF	Review motion to consolidate filed with the Judicial Panel on Multidistrict Litigation, including begin to outline thoughts regarding response and next steps related to upcoming class certification hearing in light of the same	0.3	\$425	\$ 127.50
2020-01-14	EHG	Review MDL papers, call with MLS regarding same	0.5	\$910	\$ 455.00
2020-01-15	RMP	Review and analyze Judicial Panel on Multidistrict Litigation motion to coordinate; review materials for class certification	0.6	\$725	\$ 435.00
2020-01-22	MLS	Review JPML filing and tel. call C. Schaffer re same	0.5	\$800	\$ 400.00
2020-01-27	LCF	Analyze recent filings regarding Judicial Panel on Multidistrict Litigation and opposition to motion to dismiss briefing in the Coordes Washington case, including outline thoughts for team	0.2	\$425	\$ 85.00
2020-01-29	LPL	Legal research regarding whether it is prudent to consolidate cases in MDL where one case is approaching trial	1.1	\$465	\$ 511.50

2020-01-29	MLS	Conference L. Lam regarding notice of appearance in JPML; emails re same; Conf. call w Team regarding JPML discovery issues	1.3	\$800	\$ 1,040.00
2020-01-30	LPL	E-mails with M. Schrag regarding research for Plaintiffs' response to JPML motion to transfer and consolidate	0.3	\$465	\$ 139.50
2020-01-30	JJB	Review and analyze filings before JPML	0.6	\$580	\$ 348.00
2020-01-31	LPL	E-mails with team re: research and outline for Plaintiffs' response to JPML motion to transfer and consolidate	0.6	\$465	\$ 279.00
2020-01-31	MLS	tel. call L. Lam re JPML response and discovery letter briefs; review/edit JPML opp.	0.7	\$800	\$ 560.00
2020-01-31	LPL	Draft Plaintiffs' response to JPML motion to transfer and consolidate; confer with M. Schrag regarding same	4.3	\$465	\$ 1,999.50
2020-02-02	MLS	work on opp. to JPML coordination motion;	0.7	\$800	\$ 560.00
2020-02-03	JJB	Review and analyze response in opposition to motion for consolidation before JPML	0.8	\$580	\$ 464.00
2020-02-03	JJB	Research re other actions pending before JPML	1.1	\$580	\$ 638.00
2020-02-03	MLS	work on opp. to JPML coordination motion; telephone calls L. Lam regarding same	1.5	\$800	\$ 1,200.00
2020-02-03	LPL	Edits to draft response to JPML motion to transfer; research on other related pending actions for the same	4.9	\$465	\$ 2,278.50
2020-02-04	LPL	Review and analyze Dann Law's response in support of consolidation/MDL	0.3	\$465	\$ 139.50
2020-02-04	LPL	Conf. call and e-mail with team regarding status of draft JPML response	0.4	\$465	\$ 186.00
2020-02-04	LPL	Review and analyze draft response to JPML motion to transfer and consolidate	0.5	\$465	\$ 232.50

2020-02-04	MLS	review/edit JMPL filing; emails Team re same; telephone calls L. Lam and J. Bloomfield regarding JPML filing and Third Amended Complaint	1.3	\$800	\$ 1,040.00
2020-02-05	LCF	Review Judicial Panel on Multidistrict Litigation responses from other parties, as well as review and analyze our draft response and correspondence related to the same	0.3	\$425	\$ 127.50
2020-02-05	JJB	Review and revise response in opposition to motion for consolidation before JPML	0.5	\$580	\$ 290.00
2020-02-05	LPL	Edit, finalize, and file Plaintiffs' response in opposition to motion to transfer and consolidate into an MDL	2.2	\$465	\$ 1,023.00
2020-02-05	MLS	Work on and finalize JPML opp brief; emails Team regarding same; conference E. Gibbs and L. Lam re same; review WF opp to JPML filing	4.5	\$800	\$ 3,600.00
2020-02-07	JJB	Review and analyze filing before the JPML	0.5	\$580	\$ 290.00
2020-02-12	MLS	Review JPML reply	0.3	\$800	\$ 240.00
2020-02-13	LCF	Review Reply filed in support of Coordes plaintiffs' motion with the Judicial Panel on Multidistrict Litigation	0.2	\$425	\$ 85.00
2020-02-27	LPL	E-mails with team regarding filing notice of presentation in JPML	0.1	\$465	\$ 46.50
2020-03-02	LCF	Assist with Notice of Presentment for Judicial Panel on Multidistrict Litigation, including review and provide feedback to Ms. Lam regarding draft	0.1	\$425	\$ 42.50
2020-03-16	LPL	Review supplemental filing by the Coordes plaintiffs in the JPML	0.2	\$465	\$ 93.00
		Project Total:	31.4		\$ 18,956.00
Project: Deposition of Wells Fargo Expert Christopher James					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-03	NS	Review Defendant's expert report and the Court's scheduling order	1.3	\$415	\$ 539.50
2020-01-10	LCF	Begin to prepare for deposition of Wells Fargo's banking expert, Mr. James, including outline preliminary thoughts regarding documents needed to prepare	0.2	\$425	\$ 85.00

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2020-01-20	MLS	Prepare for James deposition	2.3	\$800	\$ 1,840.00
2020-01-21	NS	Research on Defendant's Expert Christopher James	0.9	\$415	\$ 373.50
2020-01-21	MLS	Prepare for James deposition	4.8	\$800	\$ 3,840.00
2020-01-22	LPL	Work with M. Schrag to prep for deposition of WF expert Christopher James	0.3	\$465	\$ 139.50
2020-01-22	NS	Research Daubert motions on Christopher James	1.3	\$415	\$ 539.50
2020-01-22	MLS	Prepare for James deposition; draft outline; review James and Salah reports	5.7	\$800	\$ 4,560.00
2020-01-23	MLS	Prepare for James deposition and take James deposition	4	\$800	\$ 3,200.00
		Project Total:	20.8		\$ 15,117.00
Project: Defending Salah deposition and responding to Salah subpoena					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-06	LPL	E-mails with team regarding responding to Wells Fargo's subpoenas to Plaintiffs' experts	0.2	\$465	\$ 93.00
2020-01-08	NS	Draft expert (D. Salah) response to Defendant's subpoena	1.1	\$415	\$ 456.50
2020-01-09	NS	Continue to draft expert (D. Salah) response to Defendant's subpoena	2.8	\$415	\$ 1,162.00
2020-01-10	LPL	Review and edit draft responses and objections to WF's subpoenas to Salah and Kelley	2.9	\$465	\$ 1,348.50
2020-01-13	LPL	Review and analyze documents to produce in response to expert witness subpoenas; finalize and produce responses	0.6	\$465	\$ 279.00
2020-01-16	MLS	Prepare for Salah Depo--meeting w/ D. Salah; review Salah and James reports	5	\$800	\$ 4,000.00
2020-01-17	LPL	Confer with M. Schrag and damages expert D. Salah regarding how his deposition went	0.3	\$465	\$ 139.50
2020-01-17	RMP	Prepare for expert deposition of Salah	0.3	\$725	\$ 217.50
2020-01-17	MLS	Prep for Salah depo and defend Salah expert depo; conference with L. Lam regarding the same	5.5	\$800	\$ 4,400.00
2020-01-18	RMP	Review deposition transcript of Dan Salah	0.8	\$725	\$ 580.00

		Project Total:	19.5		\$ 12,676.00
Project: Defending Kelley deposition and responding to Kelley subpoena					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-03	LPL	Legal research regarding whether experts are obligated to produce reports and testimony from prior, unrelated cases	0.4	\$465	\$ 186.00
2020-01-07	LPL	E-mail to N. Shah regarding drafting responses and objections to WF's document subpoenas to expert witnesses	0.4	\$465	\$ 186.00
2020-01-09	NS	Draft expert (B. Kelley) response to Defendant's subpoena/RFP	0.9	\$415	\$ 373.50
2020-01-10	LCF	Begin to prepare to defend Mr. Kelley, including outline preliminary thoughts regarding documents needed to prepare and discuss same with Mr. Paul, and draft comprehensive instructions to Mr. Neal regarding gathering documents needed for expert witness preparations	0.2	\$425	\$ 85.00
2020-01-16	LPL	E-mail to N. Shah regarding legal research on producing detailed billing entries from expert witness	0.2	\$465	\$ 93.00
2020-01-16	NS	Legal research regarding discovery of expert billing	1.8	\$415	\$ 747.00
2020-01-18	RMP	Prepare for deposition of Brian Kelley	0.8	\$725	\$ 580.00
2020-01-20	LCF	Continue to prepare to defend deposition of Mr. Kelley	0.2	\$425	\$ 85.00
2020-01-21	RMP	Prepare for deposition of Kelley	1.5	\$725	\$ 1,087.50
2020-01-23	LCF	Review correspondence from Ms. Lam providing response to Wells Fargo's subpoena to Mr. Kelley	0.1	\$425	\$ 42.50
2020-01-23	LPL	Finalize and serve responses/objections and documents in response to Wells Fargo's subpoena to Brian Kelley	0.5	\$465	\$ 232.50
2020-01-24	RMP	Prepare for Kelley deposition	0.6	\$725	\$ 435.00
2020-01-28	LCF	Continue to prepare for expert witness depositions, including review prior cases in which Mr. Kelley was involved and locate any relevant pleadings related to Mr. Kelley	1	\$425	\$ 425.00

2020-01-29	LCF	Receive call from Mr. Kelley regarding upcoming deposition and whether additional documents needed and draft follow-up correspondence confirming no additional documents needed at this time	0.2	\$425	\$ 85.00
2020-01-31	RMP	Prepare for Kelley deposition	1.3	\$725	\$ 942.50
2020-01-31	MLS	Review Kelley and Ross reports; conference call Kelley and R. Paul regarding deposition preparation	3.3	\$800	\$ 2,640.00
2020-02-03	LPL	Call with M. Schrag regarding documents produced in response to subpoena to Brian Kelley	0.2	\$465	\$ 93.00
2020-02-03	RMP	Prepare Brian Kelley for deposition	2	\$725	\$ 1,450.00
2020-02-03	MLS	Travel to Los Angeles from Oakland for Kelley Depo; prepare for Kelley Depo--review Kelley reports and Ross report and documents cited; meeting with B. Kelley re same; telephone calls with R. Paul regarding same	8	\$800	\$ 6,400.00
2020-02-04	MLS	Prepare for Kelley Depo; defend Kelley Depo;travel home to Oakland from Los Angeles	9	\$800	\$ 7,200.00
2020-02-04	RMP	Attend deposition of Brian Kelley; travel to Los Angeles from Kansas City for deposition	12	\$725	\$ 8,700.00
		Project Total:	44.6		\$ 32,068.50
Project: Third amended complaint					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-02-03	JJB	Work on draft Third Amended Complaint	2.3	\$580	\$ 1,334.00
2020-02-04	JJB	Work on draft Third Amended Complaint	2.1	\$580	\$ 1,218.00
2020-02-05	LPL	Confer with M. Schrag and J. Bloomfield regarding status of draft Third Amended Complaint due tomorrow	0.4	\$465	\$ 186.00
2020-02-05	RMP	Review and edit Third Amended Complaint	1	\$725	\$ 725.00
2020-02-05	JJB	Work on draft Third Amended Complaint	1.6	\$580	\$ 928.00
2020-02-05	MLS	Work on Third Amended Complaint	2.2	\$800	\$ 1,760.00

2020-02-06	JJB	Emails regarding Third Amended Complaint	0.4	\$580	\$ 232.00
2020-02-06	LCF	Assist with finalizing Third Amended Complaint, including review draft facts for Ms. Campos and compare to her deposition testimony, outline changes to be made to the same and send draft changes to Mr. Bloomfield	1	\$425	\$ 425.00
2020-02-06	LPL	Edit, finalize, and file Third Amended Complaint	3.4	\$465	\$ 1,581.00
		Project Total:	14.4		\$ 8,389.00
Project: Motion for approval of litigation class notice plan					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-31	LCF	Participate in conference call with counsel for Wells Fargo to meet and confer regarding next steps with respect to discovery and case management generally in light of Court's Order granting certification	0.4	\$425	\$ 170.00
2020-01-31	RMP	Conference call with opposing counsel regarding depositions and class notice	0.4	\$725	\$ 290.00
2020-02-02	RMP	Work on class notice	0.2	\$725	\$ 145.00
2020-02-06	NRL	Continued researching class notice issue; created short memorandum on findings and case summaries	3.7	\$275	\$ 1,017.50
2020-02-07	LPL	E-mails with team regarding draft of class notice and law on claim splitting	0.4	\$465	\$ 186.00
2020-02-07	RMP	Work on class notice	0.4	\$725	\$ 290.00
2020-02-07	JJB	Review and revise draft class notice	0.6	\$580	\$ 348.00
2020-02-07	LCF	Continue to work on draft class notice, including review and analyze cases and legal articles regarding potential claims preclusion, conduct additional research regarding the same, and outline thoughts regarding impact on draft class notice	1	\$425	\$ 425.00
2020-02-07	AGS	Draft Class Notice and send to M. Schrag	2.3	\$575	\$ 1,322.50
2020-02-10	LCF	Outline and analyze strategy regarding next steps to finalize draft class notice as well as draft motions for partial summary judgment	0.5	\$425	\$ 212.50

2020-02-10	RMP	Work on class notice and settlement structure	1.5	\$725	\$ 1,087.50
2020-02-10	MLS	Work on class notice; legal research regarding class notice, claims splitting and Am. Pipe tolling; conference S. Tindall re same	3.5	\$800	\$ 2,800.00
2020-02-11	MLS	Work on class notice; review legal research memos re same; emails re same	1.8	\$800	\$ 1,440.00
2020-02-11	RMP	Work on class notice; research claim splitting	1.8	\$725	\$ 1,305.00
2020-02-12	JJB	Research regarding motion for approval of joint notice plan	0.6	\$580	\$ 348.00
2020-02-12	JJB	Work on motion for approval of joint notice plan	1.4	\$580	\$ 812.00
2020-02-13	JJB	Work on motion for approval of joint notice plan	1.3	\$580	\$ 754.00
2020-02-14	JJB	Work on motion for approval of joint notice plan	1.5	\$580	\$ 870.00
2020-02-14	MLS	Work on motion for class notice; emails to J. Bloomfield re same; emails to claims administrator regarding pricing for class notice	1.5	\$800	\$ 1,200.00
2020-02-15	MLS	Work on class notice brief	1.3	\$800	\$ 1,040.00
2020-02-15	JJB	Finalize and circulate draft motion for approval of joint notice plan	2.7	\$580	\$ 1,566.00
2020-02-17	JJB	Review and edit revised draft of motion for approval of joint class notice	1.3	\$580	\$ 754.00
2020-02-17	MLS	Emails with claims administrators regarding class notice bids; edit class notice filing	1.5	\$800	\$ 1,200.00
2020-02-17	RMP	Draft motion for approval of class notice	1.5	\$725	\$ 1,087.50
2020-02-18	RMP	Work on class notice; phone conference with opposing counsel regarding same	0.7	\$725	\$ 507.50
2020-02-18	JJB	Review and analyze bids from notice administration firms	1.2	\$580	\$ 696.00

2020-02-18	LCF	Work on draft Class Notice, including review preliminary draft to Wells Fargo and Wells Fargo's proposed revisions, analyze relevant Federal Judicial Center guidelines, outline thoughts regarding whether Wells Fargo's edits; review further revised draft Class Notice from Mr. Schrag incorporating various comments/suggested changes	2.3	\$425	\$ 977.50
2020-02-18	MLS	Review WF redlines to notice; revise class notice and legal research regarding same; review/edit notice filing; emails and telephone calls claims administrator regarding bids for notice mailing; emails J. Bloomfield regarding same	3.8	\$800	\$ 3,040.00
2020-02-19	LPL	Call with M. Schrag, co-counsel, and defense counsel regarding draft class notice and joint motion regarding distribution plan	0.6	\$465	\$ 279.00
2020-02-19	JJB	Review and revise draft Motion for Approval of Joint Notice Plan	1.5	\$580	\$ 870.00
2020-02-19	MLS	Review/edit class notice and joint filing regarding same; meet and confer with defendant's counsel regarding same and re MSC; review/edit proposed order regarding class notice; emails regarding potential notice administrators	2.8	\$800	\$ 2,240.00

2020-02-19	LCF	Continue to work on draft Class Notice and Motion for Notice/Further Discovery and circulate revisions, including revise drafts and incorporate further edits, correspond with Mr. Bloomfield regarding requested discovery and result of discovery conference with Judge Beeler; draft proposed order granting notice and further discovery and correspond with Mr. Schrag regarding drafts; participate in meet and confer call with Ms. Brinson and Mr. Schrag regarding class notice drafts and potential compromise positions	3.7	\$425	\$ 1,572.50
2020-02-19	LPL	Edits to draft class notice and joint motion regarding class notice; confer with M. Schrag and team regarding same	5.3	\$465	\$ 2,464.50
2020-02-20	JJB	Review and revise motion for approval of joint notice plan	0.7	\$580	\$ 406.00
2020-02-20	RMP	Work on class notice and notice plan; correspondence with opposing counsel	1	\$725	\$ 725.00
2020-02-20	LCF	Assist with finalizing Joint Class Notice and Motion for Approval of Notice/Further Discovery, including review and analyze Wells Fargo's proposed edits to Notice, research Wells Fargo's prior efforts to locate class members and circulate thoughts regarding the same related to time period needed to opt-out, outline thoughts regarding proposed edits; participate in call with team to review final edits; review and provide feedback regarding additional edits to draft notice and proposed order from Ms. Lam and confirm no further edits before filing	1.4	\$425	\$ 595.00

2020-02-20	MLS	Work on class notice and motion for class notice to finalize for filing; meet/confer defense counsel regarding same; conference call Team regarding same; emails regarding same; conf. L. Lam re same; email Team regarding class definition	5.5	\$800	\$ 4,400.00
2020-02-20	LPL	Work with team and Wells Fargo to edit and finalize joint filing on proposed class notice (brief, proposed notice, exhibits, and proposed order)	7.9	\$465	\$ 3,673.50
		Project Total:	71.5		\$ 43,117.00
Project: Meet and confer on cap sheet / notice Rule 30(b)(1) cap sheet deposition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-01-02	LCF	Draft and circulate letter brief to court regarding Wells Fargo's failure to engage in meet and confer and failure to substantively answer Plaintiffs' First Request For Admissions, Third and Fourth Interrogatories, and Third Request For Production, as well as refusal to produce 30(b)(1) witness, including outline research of "good cause," analyze whether specific discovery requests on which we should not move to compel, correspond with Mr. Bloomfield regarding assistance with research, review and incorporate research from Mr. Bloomfield	3.5	\$425	\$ 1,487.50
2020-01-03	LCF	Review revised draft discovery letter from Ms. Lam and prepare to discuss comments and proposed edits; call with co-counsel regarding discovery letter	0.7	\$425	\$ 297.50
2020-01-05	RMP	Review Plaintiffs' discovery motion	0.1	\$725	\$ 72.50
2020-01-10	LPL	Review and analyze Wells Fargo's discovery letter brief on 30(b)(1) witness and outstanding RFP/interrogatory issues; confer with M. Schrag regarding same	0.4	\$465	\$ 186.00

2020-01-13	LPL	Confer with M. Schrag regarding Judge Beeler's order on meeting and conferring on discovery disputes on 1/15	0.3	\$465	\$ 139.50
2020-01-14	LPL	Confer with co-counsel L. Fellows regarding discovery issues in dispute for court-ordered meet and confer	1.3	\$465	\$ 604.50
2020-01-17	MLS	Meet and confer WF counsel regarding discovery issues; telephone call R. Paul regarding same	0.8	\$800	\$ 640.00
2020-01-17	LPL	Meet and confer with defense counsel regarding disputes on certain discovery requests and Mary Coffin's deposition	0.9	\$465	\$ 418.50
2020-01-23	MLS	Meet and confer with defense counsel regarding discovery issues	0.5	\$800	\$ 400.00
2020-01-23	LPL	Meet and confer in person with defense counsel re: outstanding discovery disputes; e-mail to team to summarize the same	0.7	\$465	\$ 325.50
2020-01-27	LPL	Edits to draft discovery letter briefs to Judge Beeler regarding Mary Coffin deposition and WF's responses to certain written discovery requests	1.1	\$465	\$ 511.50
2020-01-28	MLS	review/edit discovery letters; tel. calls and emails L. Lam and L. Fellows regarding same	1	\$800	\$ 800.00
2020-01-28	LPL	Continue editing discovery letter brief to Judge Beeler re: Wells Fargo's responses to certain written discovery requests and Mary Coffin deposition	4.6	\$465	\$ 2,139.00
2020-01-29	LPL	E-mails with defense counsel regarding finalizing and filing joint letter brief on outstanding discovery disputes	0.2	\$465	\$ 93.00
2020-01-31	LPL	Conference call with team and defense counsel regarding discovery disputes in light of order on class certification and class notice	0.6	\$465	\$ 279.00
2020-01-31	LPL	Edit Plaintiffs' portions of discovery letter briefs to Judge Beeler; send to defense counsel	0.6	\$465	\$ 279.00
2020-02-03	LPL	E-mails with defense counsel and co-counsel regarding discovery dispute letter briefs to Judge Beeler	0.2	\$465	\$ 93.00

2020-02-05	LCF	Review status of scheduling 30(b)(1) deposition, including correspond with Ms. Lam regarding response, if any, to the same	0.1	\$425	\$ 42.50
2020-02-05	LPL	E-mails with defense counsel regarding Wells Fargo's production of communications with legislators	0.2	\$465	\$ 93.00
2020-02-05	LPL	Edit, finalize, and file discovery letter briefs on outstanding written discovery disputes and deposition of Mary Coffin	1.1	\$465	\$ 511.50
2020-02-07	LPL	E-mails with team regarding cap sheet deposition	0.2	\$465	\$ 93.00
2020-02-07	LPL	E-mails with team re: next week's discovery conference with Judge Beeler	0.2	\$465	\$ 93.00
2020-02-09	LPL	E-mail to M. Schrag regarding upcoming discovery conference with Judge Beeler	0.1	\$465	\$ 46.50
2020-02-10	LPL	E-mails with L. Fellows and J. Bloomfield regarding preparing for discovery conference with Judge Beeler	0.2	\$465	\$ 93.00
2020-02-10	JJB	Prepare for discovery hearing	3.8	\$580	\$ 2,204.00
2020-02-11	JJB	Emails with co-counsel	0.3	\$580	\$ 174.00
2020-02-11	LPL	E-mails with J. Bloomfield and call with L. Fellows regarding: preparing for discovery conference with Judge Beeler	0.4	\$465	\$ 186.00
2020-02-11	JJB	Prepare for discovery hearing	1.9	\$580	\$ 1,102.00
2020-02-12	LPL	Conf. call with team re: discovery conference, motion for summary judgment, and class notice	0.5	\$465	\$ 232.50
2020-02-12	JJB	Call with L. Fellows and L. Lam regarding discovery hearing	0.8	\$580	\$ 464.00
2020-02-12	LPL	Conference call with J. Bloomfield and L. Fellows regarding prep for upcoming discovery conference with Judge Beeler	0.8	\$465	\$ 372.00
2020-02-12	MLS	conf. call team re discovery hearing; further discovery to request in 2/20 filing; status of MSJ re contract interpretation	0.8	\$800	\$ 640.00
2020-02-12	JJB	Final preparations for discovery hearing	2.1	\$580	\$ 1,218.00

2020-02-13	JJB	Draft and circulate summary of discovery hearing	0.7	\$580	\$ 406.00
2020-02-13	JJB	Appear and argue outstanding issues at discovery hearing before Judge Beeler	3.8	\$580	\$ 2,204.00
2020-02-21	LCF	Review correspondence from Ms. Smedley requesting date for deposition of records custodian, analyze potential response to the same, draft and send response requesting location of deponent	0.1	\$425	\$ 42.50
2020-02-22	LCF	Review correspondence from Ms. Lam with updated notice of 30(b)(1) deposition	0.1	\$425	\$ 42.50
2020-02-26	LCF	Draft and send response to Ms. Smedley regarding requested dates for records' custodian deposition and to request dates for depositions of Mr. Nold and two other Wells Fargo employees	0.1	\$425	\$ 42.50
2020-02-28	LCF	Draft follow-up correspondence to Ms. Obi regarding status of Wells Fargo's privilege log and documents ordered by Judge Beeler	0.1	\$425	\$ 42.50
		Project Total:	35.9		\$ 19,111.00
Project: Response to Rule 23(f) petition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-02-12	JJB	Review and analyze 23(f) petition filed by Wells Fargo	1.2	\$580	\$ 696.00
2020-02-13	LCF	Briefly review Wells Fargo's 23f Petition; review relevant rules of appellate procedure regarding response date	0.3	\$425	\$ 127.50
2020-02-13	RMP	Review 23f petition	0.4	\$725	\$ 290.00
2020-02-13	MLS	Email to A. Groves regarding extension; legal research regarding extension; review model motions to extend time; draft motion and declaration regarding extension; conference with R. Paul regarding same and about settlement issues	1.5	\$800	\$ 1,200.00

2020-02-13	MLS	Review 23F petition; conference with A. Mura and D. Hughes regarding plan to oppose and request extension; emails A. Mura regarding same	1.8	\$800	\$ 1,440.00
2020-02-13	JJB	Research and begin drafting motion for extension of time to file response to 23(f) petition	2.8	\$580	\$ 1,624.00
2020-02-14	MLS	work on motion for extension of time to 9th cir; emails A. Mura and J. Bloomfield re same	0.5	\$800	\$ 400.00
2020-02-14	RPN	Review authorities cited in petition for permission to appeal for drafting of response to same	0.7	\$230	\$ 161.00
2020-02-14	JJB	Research, finalize and file motion for extension of time to file response to 23(f) petition	2.3	\$580	\$ 1,334.00
2020-02-17	RPN	Work on response to petition for permission to appeal	1.1	\$230	\$ 253.00
2020-02-19	LPL	Call to Ninth Circuit clerk's office to follow up on request for additional time on Rule 23(f) response; confer with M. Schrag regarding same	0.4	\$465	\$ 186.00
2020-02-19	LCF	Continue to work on Opposition to Wells Fargo's request for 23f appeal, including participate in strategy call with appellate counsel to outline procedural/factual history relevant to appeal and next steps	0.9	\$425	\$ 382.50
2020-02-19	LPL	Call with Jennifer Bennett and team regarding responding to WF's Rule 23(f) petition	1.1	\$465	\$ 511.50
2020-02-19	MLS	Meet and confer with appellate counsel regarding 23f; research appellate rules regarding extensions; emails regarding same; conference with L. Lam regarding same	1.3	\$800	\$ 1,040.00
2020-02-20	JJB	Review order from 9th Circuit granting extension of time to respond to 23(f) petition	0.2	\$580	\$ 116.00
2020-02-20	MLS	Emails with J. Bennett re 23f response	0.3	\$800	\$ 240.00
2020-02-20	LPL	Draft background statement for response to Rule 23(f) petition	1.3	\$465	\$ 604.50

2020-02-21	MLS	Work on 23f appeal background statement; call L. Lam regarding same	2.3	\$800	\$ 1,840.00
2020-02-21	LPL	Continue drafting background statement for opposition to Wells Fargo's Rule 23(f) petition	2.5	\$465	\$ 1,162.50
2020-02-27	LPL	Conference call with co-counsel, M. Schrag, and Jennifer Bennett et al. re: response to Wells Fargo's Rule 23(f) petition	0.5	\$465	\$ 232.50
2020-02-27	MLS	Conference call with Team re 23F Opposition	0.5	\$800	\$ 400.00
2020-02-27	RMP	Work on opposition to Rule 23f petition	0.9	\$725	\$ 652.50
2020-03-02	LPL	Review and analyze draft response to Wells Fargo's Rule 23(f) petition	0.5	\$465	\$ 232.50
2020-03-02	MLS	Review/edit 23F opp draft; email regarding same	1	\$800	\$ 800.00
2020-03-03	LCF	Continue to work on Opposition to Wells Fargo's Rule 23 Motion, including review and analyze latest draft, review additional edits from Mr.Paul, and outline further edits to draft	1	\$425	\$ 425.00
2020-03-05	MLS	Work on 23f Opp. to finalize for filing	0.7	\$800	\$ 560.00
		Project Total:	28		\$ 16,911.00
Project: Class damages analysis (post class cert order)					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-02-05	MLS	Conference call R. Paul and experts; telephone call with D. Salah regarding damages	0.7	\$800	\$ 560.00
2020-02-12	LCF	Assist with preparing additional information to send to Mr. Salah re: preparing class members' damages, including begin to work with Mr. Neal to obtain additional identifying information for class members and add to the "Customer Impact Tracking Chart" from Wells Fargo	0.4	\$425	\$ 170.00
2020-02-13	LCF	Begin to outline potential next steps related to damages in light of the additional settlement authority from Judge Alsup	0.2	\$425	\$ 85.00

2020-02-13	LCF	Continue to assist with preparing additional information to send to Mr. Salah for use in preparing class members' damages, including continue work with Mr. Neal to obtain additional identifying information for class members and add to the "Customer Impact Tracking Chart" from Wells Fargo, review revised chart from Mr. Neal	0.5	\$425	\$ 212.50
2020-02-14	RMP	Work with Dan Salah on damage calculations	0.9	\$725	\$ 652.50
2020-02-14	MLS	Conference call R. Paul and D. Salah regarding class damages analysis; email to defendant counsel regarding damages discovery needed	1	\$800	\$ 800.00
2020-02-14	LCF	Assist with providing information to Mr. Salah for class members' damage calculations, including analyze additional information needed, locate and send additional documents, as well as finalize chart with class members' names for Mr. Salah	1.2	\$425	\$ 510.00
2020-02-15	RMP	Work with Dan Salah on damages analysis	0.5	\$725	\$ 362.50
2020-02-15	MLS	Conference call R. Paul and D. Salah regarding damages analysis and differences between CIT spreadsheet and mediation spreadsheet produced in discovery	0.7	\$800	\$ 560.00
2020-02-17	LCF	Review update from Mr. Salah regarding data questions in connection with updated damage numbers, including analyze relevant documents and attempt to outline responses to the same; correspond with Mr. Schrag regarding responses to Mr. Salah's questions	0.4	\$425	\$ 170.00
2020-02-19	LCF	Review additional cap sheets produced by Wells Fargo for class members, correspond with Ms. Lam regarding send the same to Mr. Salah for review, and confirm same sent to Mr. Salah	0.2	\$425	\$ 85.00

2020-02-19	LPL	E-mails with expert Dan Salah regarding class member cap sheets recently produced by Wells Fargo	0.2	\$465	\$ 93.00
2020-02-23	JJB	Draft email memo regarding damages and Wells Fargo cases applying Munger formula	0.9	\$580	\$ 522.00
2020-02-23	JJB	Research regarding damages and Wells Fargo cases applying Munger formula	2.4	\$580	\$ 1,392.00
2020-02-24	JJB	Additional research regarding damages and Wells Fargo cases applying Munger formula	2.7	\$580	\$ 1,566.00
2020-02-25	RMP	Work with Dan Salah to review damages model	0.7	\$725	\$ 507.50
2020-02-26	LCF	Review correspondence from Mr. Salah regarding information needed for certain class members for damages analysis; analyze potential sources to locate the same	0.1	\$425	\$ 42.50
2020-02-27	MLS	Work on damages analysis; emails to defendant's counsel re settlement; emails D. Salah re same	1.3	\$800	\$ 1,040.00
		Project Total:	15		\$ 9,330.50

Project: Settlement conference with Judge Ryu

Date	Timekeeper	Description	Hours x Rate = Fee		
2019-04-22	LPL	Research Judge Ryu's settlement conference practices in preparation for pre-settlement call with her	0.4	\$465	\$ 186.00
2019-04-24	RMP	Prepare for settlement conference	1.5	\$725	\$ 1,087.50
2019-04-26	LCF	Correspond with Wells Fargo's counsel and Plaintiffs' counsel to discuss pre-settlement conference this afternoon and Wells Fargo's position with respect to the same	0.4	\$425	\$ 170.00
2019-04-26	RMP	Prepare for and participate in settlement conference with magistrate	0.7	\$725	\$ 507.50
2019-04-26	MLS	Meet and confer with defendant's counsel re same; telephone call with R. Paul regarding same; tel call and email G. Freeman re same; conference with Magistrate Ryu	1	\$800	\$ 800.00

2019-04-30	LCF	Review full settlement conference order outlining additional dates for submission of pre-settlement documents and other relevant settlement dates and confirm dates correctly calendared; review Judge Alsup's Order approving protective order and outlining additional guidance regarding designation of confidential materials and filing documents under seal	0.3	\$425	\$ 127.50
2019-09-09	LCF	Continue to work on potential settlement discussions; review updated Alternative Dispute Resolution Order moving settlement dates and pre-conference submissions; confirm revised dates correctly calendared	0.2	\$425	\$ 85.00
2019-09-09	RMP	Conference call with Judge Ryu regarding settlement conference	0.2	\$725	\$ 145.00
2019-10-08	LCF	Continue to outline preparations for settlement conference and general next steps with discovery; call with team regarding the same; including analyze and update notes regarding status of "hot" documents review in advance of call to share with team	1.3	\$425	\$ 552.50
2019-10-08	RMP	Prepare for settlement conference; review hot documents	1.6	\$725	\$ 1,160.00
2019-10-21	LCF	Continue to analyze preparations for settlement conference and how to analyze class member information and data, including begin to draft instructions for Mr. Neal regarding relevant information needed for each client	0.5	\$425	\$ 212.50
2019-10-24	NRL	Researched Department of Housing and Urban Development mortgagee letters from 2005 to 2018; downloaded and saved any letters that contained updates to state attorney fee matrix	0.8	\$275	\$ 220.00
2019-10-24	RPN	Research client data for settlement conference brief	1.6	\$230	\$ 368.00

2019-10-24	LCF	Continue to analyze class list and outlining information regarding each "signed-up" client in light of class list; begin to draft instructions for Mr. Neal regarding how to analyze whether each client's information is on the client list and locating relevant loan numbers for each client; analyze additional information to incorporate into current class list in preparation for settlement discussions	1.8	\$425	\$ 765.00
2019-10-25	NRL	Research into Housing and Urban Development mortgagee letters; draft memorandum with brief description of my findings	0.2	\$275	\$ 55.00
2019-10-25	MLS	Meet confer Defendant's counsel re class member communication, deposition schedule and settlement conference.; draft memo to team re same	1.2	\$800	\$ 960.00
2019-10-25	RPN	Research client data for settlement conference brief	3.3	\$230	\$ 759.00
2019-11-04	LCF	Continue to work on identifying clients from the class list provided by Wells Fargo, including analyze preliminary identification of clients with Mr. Neal and outline thoughts regarding additional clients we have not yet located on spreadsheet; review Everlaw and potential documents to be used to verify identification of clients	0.6	\$425	\$ 255.00
2019-11-04	RPN	Research client data for settlement conference brief	3.4	\$230	\$ 782.00
2019-12-07	LCF	Review Court Order resetting settlement conference deadlines	0.1	\$425	\$ 42.50
2020-01-16	LCF	Begin to outline potential next steps regarding case management generally and settlement after class certification hearing	0.3	\$425	\$ 127.50
2020-01-16	LPL	Confer and e-mails with team regarding Wells Fargo's statement that it's open to discussing individual settlements of CA class members	1.6	\$465	\$ 744.00

2020-01-16	MLS	Review court order and WF letter regarding settlement; discuss same w/ Team; email to Team re individual settlement analysis for CA clients	1.7	\$800	\$ 1,360.00
2020-01-20	LCF	Continue to analyze potential settlement discussions and next steps, including analyze number of plaintiffs from each state and number of clients from each state, prepare summary chart of analysis and outline thoughts regarding the same	1	\$425	\$ 425.00
2020-02-04	MLS	Meeting with defense counsel regarding settlement	0.5	\$800	\$ 400.00
2020-02-05	LCF	Review correspondence from Wells Fargo with updated Customer Impact Tracking chart/class list	0.1	\$425	\$ 42.50
2020-02-10	RPN	Review loan summary data from Defendant regarding account numbers and identities of potential clients	0.4	\$230	\$ 92.00
2020-02-10	LPL	Meeting with M. Schrag and J. Bloomfield regarding upcoming deadlines in the case for settlement conf., MSJ, and class notice	0.5	\$465	\$ 232.50
2020-02-10	MLS	Meet/confer Defendant counsel re Mandatory Settlement Conference, trial plan and data needed. conf. call Team regarding same; review pre-trial guidelines and schedule; follow up emails	1.8	\$800	\$ 1,440.00
2020-02-11	MLS	Prepare for pre Mandatory Settlement Conference conference call; review CIT chart w/ addresses; emails re discovery needed for damages; tel calls R. Paul regarding same	1.3	\$800	\$ 1,040.00
2020-02-12	RMP	Pre-settlement conference hearing with Magistrate Judge Ryu	0.2	\$725	\$ 145.00
2020-02-12	LCF	Outline and analyze strategy regarding documents and information needed to prepare for upcoming settlement conference	0.3	\$425	\$ 127.50
2020-02-12	RMP	Work on settlement structure and damages analysis	0.5	\$725	\$ 362.50

2020-02-12	RPN	Research plaintiff and potential plaintiff mortgage addresses and account information for settlement-applicable accounts	0.7	\$230	\$ 161.00
2020-02-12	MLS	Conference call Judge Ryu and Defs re settlement; tel. call R. Paul re same; draft memo E. Gibbs re settlement conf. and call; tel call D. Salah and R. Paul	0.8	\$800	\$ 640.00
2020-02-13	RMP	Conference with Magistrate Judge Ryu	0.3	\$725	\$ 217.50
2020-02-13	MLS	Conference call Judge Ryu re settlement conf. parameters; discuss same with R. Paul	0.5	\$800	\$ 400.00
2020-02-13	RMP	Work on settlement structure issues	0.5	\$725	\$ 362.50
2020-02-14	LCF	Create chart outlining status of other matters pending against Wells Fargo in preparation for settlement discussions, including review and analyze dockets for each case, search for any additional not yet disclosed cases, review Complaints (including any amendments) and outline claims and classes (if any) pled	1.5	\$425	\$ 637.50
2020-02-19	MLS	Telephone call Judge Ryu clerk re available dates; review Judge Ryu rules re continuances; tel. call R. Paul re continuing settlement conference	0.8	\$800	\$ 640.00
2020-02-19	RMP	Prepare for settlement conference	1	\$725	\$ 725.00
2020-02-20	LCF	Begin to draft Exchanged Settlement Statement and Confidential Settlement Letter, including review relevant Court order regarding information that must be included in each statement and begin to draft fact sections for both	3.2	\$425	\$ 1,360.00
2020-02-21	LCF	Work on preparations for settlement discussions, including work with Mr. Neal to create spreadsheet that includes all class member information in one place, including outline additional information needed for each class member and identifying class members	0.3	\$425	\$ 127.50

2020-02-21	LCF	Continue to work on draft of Exchanged Settlement Conference Statement, including circulate initial draft to the team for review and edits	6.2	\$425	\$ 2,635.00
2020-02-22	RMP	Draft mandatory settlement conference statements	1.4	\$725	\$ 1,015.00
2020-02-22	LCF	Continue to work on settlement pleadings, including finish and circulate initial draft of Confidential Settlement Statement, outline specific questions regarding draft for the team	2.4	\$425	\$ 1,020.00
2020-02-23	RMP	Work on settlement statement	0.4	\$725	\$ 290.00
2020-02-23	LCF	Continue to work on settlement conference pleadings, including review and analyze edits and strategy regarding finalizing Exchanged Settlement Conference Statement and Confidential Settlement Statement	0.5	\$425	\$ 212.50
2020-02-23	LPL	Edits to draft confidential settlement letter to Judge Ryu; calls with M. Schrag and co-counsel re: same	2.8	\$465	\$ 1,302.00
2020-02-23	MLS	Work on exchanged and confidential settlement statements; telephone calls L. Lam and R. Paul re same; telephone call D. Salah re estimated damages	3.8	\$800	\$ 3,040.00
2020-02-24	LPL	Conf. call with team re: edits to draft settlement conference statement and confidential letter to Judge Ryu	0.5	\$465	\$ 232.50
2020-02-24	JJB	Review and revise draft exchanged settlement statement	0.8	\$580	\$ 464.00
2020-02-24	JJB	Review and revise draft confidential settlement conference statement	1.2	\$580	\$ 696.00
2020-02-24	LPL	Confer with M. Schrag re: edits to exchanged settlement conference statement and confidential letter to Judge Ryu	1.6	\$465	\$ 744.00
2020-02-24	RMP	Draft settlement statements	3	\$725	\$ 2,175.00

2020-02-24	LCF	Assist with finalizing settlement pleadings, including review edits and revise Confidential Settlement Letter and Exchanged Statement to include section regarding the Federal Housing Authority agreement and circulate revised drafts; review and analyze Wells Fargo's Exchanged Settlement Statement and contention Homeowners Bill of Rights claim not viable for Ms. Campos, research and analyze questions regarding calculation of contract damages and Homeowners Bill of Rights claim for Ms. Campos, circulate thoughts; and call with team regarding finalizing settlement pleadings and next steps; further revise pleadings in light of call and recirculate; review final, revised version from Ms. Lam incorporating various changes regarding Homeowners Bill of Rights and damages, and confirm no further edits	5.2	\$425	\$ 2,210.00
2020-02-24	LPL	Edits to and finalize exchanged settlement statement and confidential settlement letter to Judge Ryu	7.6	\$465	\$ 3,534.00
2020-02-24	MLS	work on exchanged settlement conf. statement and confidential mediation letter; legal research re same; conf. call Team re same; conf. L. Lam and J. Bloomfield re same; emails R. Paul re same; tel. call D. Salah re same; review D.Salah damages analysis	8.5	\$800	\$ 6,800.00
2020-02-25	LPL	Confer with M. Schrag re: settlement demand sent to Wells Fargo	0.2	\$465	\$ 93.00
2020-02-25	EHG	Call with M. Schrag regarding mediation strategy, approach; review, edit settlement communication	0.5	\$910	\$ 455.00
2020-02-25	RMP	Work on settlement demand	0.5	\$725	\$ 362.50

2020-02-25	MLS	Telephone call R. Paul re briefing tasks and settlement strategy; work on settlement demand; conf. E. Gibbs and R. Paul re same; review damages analysis and tel. call D. Salah re same; review MSJ;	3.8	\$800	\$ 3,040.00
2020-02-26	RMP	Prepare for mandatory settlement conference; work on settlement matrix	1.3	\$725	\$ 942.50
2020-02-27	LCF	Continue to work on obtaining a complete list of class members, including work with Mr. Neal to compare prior versions of class list and changes to the same	0.2	\$425	\$ 85.00
2020-03-01	LCF	Continue to prepare for settlement conference, including review and analyze recent order from Judge Alsup regarding proposed settlement and approval of the same, outline thoughts regarding applicability of settlement approval to facts of this case, and research other approval orders cited by Judge Alsup in recent case	0.5	\$425	\$ 212.50
2020-03-02	LCF	Continue to work on preparations for settlement conference and potential settlement generally, including outline research needed regarding Judge Alsup's settlement requirements with Mr. Brand and instruct him regarding specific topics to be researched; review and analyze specific follow-up questions and further instruct Mr. Brand regarding scope of research	0.6	\$425	\$ 255.00
2020-03-02	LCF	Continue to work with Mr. Neal to assimilate relevant class member information into one comprehensive spreadsheet, including review initial draft spreadsheet; assist with locating and forwarding class list provided in discovery and information in files regarding class members potentially represented by other counsel	0.6	\$425	\$ 255.00
2020-03-02	MLS	Prepare for settlement conference	0.8	\$800	\$ 640.00

2020-03-02	RPN	Review and organize documents identified to be possible settlement conference, or trial exhibits	5.4	\$230	\$ 1,242.00
2020-03-03	LCF	Receive update regarding result of Settlement Conference	0.1	\$425	\$ 42.50
2020-03-03	EHG	Call with team regarding mediation and mediator's proposal	0.8	\$910	\$ 728.00
2020-03-03	LPL	Confer with M. Schrag, co-counsel, and class rep Debora Granja re: results of settlement conference and what the next steps are	0.9	\$465	\$ 418.50
2020-03-03	JJB	Meet with class representatives and co-counsel re settlement conference	1.1	\$580	\$ 638.00
2020-03-03	LPL	Meeting with M. Schrag, co-counsel, and class reps Debora Granja and Sandra Campos regarding preparing for settlement conference with Judge Ryu	1.1	\$465	\$ 511.50
2020-03-03	GRB	Conducted research regarding settlement process and variables and compiled memorandum summarizing findings	2.2	\$275	\$ 605.00

2020-03-03	LCF	Finish chart with damage information along with Customer Impact Tracking chart information for class members and clients; assist with locating information needed during settlement conferencel; correspond with Mr. Salah regarding creating further tools to analyze damages; incorporate clients' information into draft damage chart, research and analyze relevant documents to locate client information, instruct Mr. Neal regarding locating client information for specific clients to incorporate, review additional contact information and attempt to confirm clients part of the Class; analyze impact of second mortgages on lost equity calculations, including research documents produced by Wells Fargo regarding second mortgages; correspond with Mr. Kelley regarding same, and review additional information from Mr. Kelley	5.5	\$425	\$ 2,337.50
2020-03-03	MLS	Prepare for settlement conference--meeting R. Paul, L. Lam, S. Campos and D. Granja; tel. calls D. Salah; attend settlement conf. with Judge Ryu.; tel. call E. Gibbs after conf.; dinner and meeting R. Paul after conf. re next steps	10.5	\$800	\$ 8,400.00
2020-03-03	RMP	Prepare for and participate in settlement conference; travel to Oakland from Kansas City for settlement conference	14.8	\$725	\$ 10,730.00
2020-03-04	MLS	Discuss settlement conference E. Gibbs; same w/ D. Hughes and D. Stein; tel. call D. Salah re damages and allocation issue ; work on damages and allocation spreadsheets;	3.2	\$800	\$ 2,560.00
2020-03-04	RMP	Return travel from Oakland to Kansas City; work on settlement allocation; work on oppositions to Rule 23f petition and motion for fees;	6.5	\$725	\$ 4,712.50
		Project Total:	147.9		\$ 86,685.50

Project: Opp. to Wells Fargo's motion for partial summary judgment					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-05-25	RMP	Draft opposition to motion for summary judgment	0.3	\$725	\$ 217.50
2020-01-29	LPL	Conf. call with team re: summary judgment motion, JPML response, and recent depositions	0.9	\$465	\$ 418.50
2020-02-04	MLS	meeting R. Paul re MSJ and damages discovery;	0.8	\$800	\$ 640.00
2020-02-21	JJB	Review and analyze Wells Fargo motion for partial summary judgment	0.6	\$580	\$ 348.00
2020-02-21	RMP	Review and analyze motion for summary judgment	0.7	\$725	\$ 507.50
2020-02-21	JJB	Research re Wells Fargo motion for partial summary judgment	1.1	\$580	\$ 638.00
2020-02-22	RMP	Draft opposition to motion for partial summary judgment	1.4	\$725	\$ 1,015.00
2020-02-25	LPL	Review and analyze Wells Fargo's motion for partial summary judgment; e-mail to M. Schrag re: same	1.2	\$465	\$ 558.00
2020-02-25	JJB	Research re California claims in Wells Fargo's motion for partial summary judgment	1.4	\$580	\$ 812.00
2020-02-26	LPL	Research on obtaining notice of trustee sale to support Sandra Campos' HBOR claim; e-mails with J. Bloomfield re: same	0.4	\$465	\$ 186.00
2020-02-26	JJB	Review S. Campos loan file for notices recorded in violation of HBOR	1.6	\$580	\$ 928.00

2020-02-26	LCF	Continue to work on draft Opposition to Wells Fargo's Motion for Partial Summary Judgment, including begin to draft fact section, review and outline thoughts regarding potential citations from depositions of Ms. Granja and Ms. Campos, as well as deposition of Wells Fargo's expert, Peter Ross; begin to research and analyze cases cited by Wells Fargo regarding breach of contract and outline thoughts regarding additional research and analysis needed; analyze various security instruments and outline thoughts regarding additional provisions to cite	7.6	\$425	\$ 3,230.00
2020-02-27	LCF	Continue to work on draft Opposition to Wells Fargo's Motion for Partial Summary Judgment, including correspond with Mr. Kelley regarding specific industry related questions, review additional documents from Mr. Kelley	0.3	\$425	\$ 127.50
2020-02-27	RMP	Work on opposition to motion for summary judgment	1	\$725	\$ 725.00
2020-02-27	LCF	Continue to work on draft Opposition to Wells Fargo's Motion for Partial Summary Judgment, including finish initial draft fact section, continue research and analyze cases cited by Wells Fargo regarding breach of contract and research potential cases to cite in response; continue to draft response regarding Wells Fargo's arguments about breach of the Fannie/Freddie contract, and begin to outline thoughts regarding draft of Federal Housing Authority contract arguments, including analyze thoughts regarding responses to Wells Fargo's arguments regarding adequate notice already sent	7.4	\$425	\$ 3,145.00
2020-02-28	JJB	Emails with record retrieval service re S. Campos Notice of Trustee's sale	0.3	\$580	\$ 174.00

2020-02-28	LCF	Continue to work on draft Opposition to Wells Fargo's Motion for Partial Summary Judgment, including continue to draft response regarding Wells Fargo's arguments about breach of the Fannie/Freddie contract and draft Federal Housing Authority contract arguments	5.2	\$425	\$ 2,210.00
2020-02-29	MLS	work on MSJ opp. draft outline of tasks/issues for Team re MSJ opp.	2	\$800	\$ 1,600.00
2020-03-01	LCF	Analyze Mr. Schrag's request to extend date to complete opposition to motion for summary judgment briefing, including analyze relevant scheduling orders and circulate thoughts regarding the same	0.2	\$425	\$ 85.00
2020-03-01	JJB	Emails with co-counsel re draft of California portions of opposition to motion for partial summary judgment	0.3	\$580	\$ 174.00
2020-03-01	LCF	Finish initial draft of facts, legal standard, and breach of contract arguments for Opposition to Wells Fargo's Motion for Partial Summary Judgment, proofread draft, and circulate draft for further review and edits	0.8	\$425	\$ 340.00
2020-03-01	RMP	Work on opposition to motion for summary judgment	2	\$725	\$ 1,450.00
2020-03-01	MLS	work on MSJ opp.emails R. Paul re same and re trial prep issues	3.7	\$800	\$ 2,960.00
2020-03-01	JJB	Research and finalize draft of California portions of opposition to motion for partial summary judgment	3.8	\$580	\$ 2,204.00
2020-03-01	LPL	Edits to draft of opposition to Wells Fargo's motion for summary judgment	4.8	\$465	\$ 2,232.00
2020-03-02	LPL	Continue researching/analyzing cases Wells Fargo cites in its motion for partial summary judgment	0.6	\$465	\$ 279.00
2020-03-02	LPL	Review M. Schrag's edits to opp. to motion for summary judgment	0.7	\$465	\$ 325.50

2020-03-02	LPL	Conf. call with M. Schrag, J. Bloomfield, and co-counsel re: edits to current draft of opposition to Wells Fargo's motion for partial summary judgment	1	\$465	\$ 465.00
2020-03-02	LCF	Continue to work on Opposition to Partial Motion for Summary Judgment, including review and analyze edits and further comments from Mr. Paul and Mr. Schrag and begin to outline thoughts in response to the same; follow-up with team regarding next steps to research and/or resolve various comments to draft and begin to draft revisions to draft opposition in light of comments	1.8	\$425	\$ 765.00
2020-03-02	MLS	work on Opp. to MSJ; legal research re same; conf. call Team re same; work on response to motion to shorten time; conf. J. Bloomfield and L. Lam re same;	6.2	\$800	\$ 4,960.00
2020-03-03	JJB	Meet with A. Mura and L. Lam re opposition to motion for partial summary judgment	0.7	\$580	\$ 406.00
2020-03-03	LPL	Confer with A. Mura and J. Bloomfield re: additional research topics for opp. to motion for partial summary judgment; e-mails re: same	0.7	\$465	\$ 325.50
2020-03-03	LCF	Continue to work on Opposition to Wells Fargo's Motion for Partial Summary Judgment, including research additional facts to potentially incorporate, as well as continue to research Housing and Urban Development regulations, analyze outstanding issues to address in draft, including review feedback from Mr. Mura regarding the same	1.6	\$425	\$ 680.00
2020-03-03	JJB	Research and drafting of opposition to motion for partial summary judgment	3.3	\$580	\$ 1,914.00
2020-03-03	LPL	Continue editing and legal research for opposition to Wells Fargo's motion for partial summary judgment	6.1	\$465	\$ 2,836.50

2020-03-04	JJB	Research and drafting of opposition to motion for partial summary judgment	2.4	\$580	\$ 1,392.00
2020-03-04	LPL	Edits to Plaintiffs' opp. to Wells Fargo's motion for partial summary judgment	2.9	\$465	\$ 1,348.50
2020-03-04	LCF	Continue to work on Opposition to Wells Fargo's Motion for Partial Summary Judgment, including continue to research Housing and Urban Development regulations and other regulatory guidance regarding "cure," further research and analysis of cases cited by Wells Fargo regarding Housing and Urban Development regulations, draft revamped section regarding Federal Housing Authority contracts, as well as review and analyze revised draft Opposition, incorporate updated Federal Housing Authority section, and circulate revised draft	6	\$425	\$ 2,550.00
2020-03-05	NRL	Conducted internet search for document based off the excerpt provided and needed for opposition to motion for partial summary judgment briefing	0.4	\$275	\$ 110.00
2020-03-05	NS	Docket cite checking Pl.'s Opp. to MSJ	0.7	\$415	\$ 290.50
2020-03-05	NS	Researching documents re Campos and Granja foreclosure proceeds	1	\$415	\$ 415.00
2020-03-05	JJB	Calls, emails and discussions with co-counsel re motion for partial summary judgment	1.2	\$580	\$ 696.00
2020-03-05	NS	Proofreading Pl.'s Opp. to MSJ	1.6	\$415	\$ 664.00
2020-03-05	JBK	Citecheck, bluebook, and proofread brief.	4.7	\$415	\$ 1,950.50
2020-03-05	LPL	Prepare, finalize, and file request for judicial notice in support of opp. to MSJ, as well as declaration with supporting exhibits	4.8	\$465	\$ 2,232.00

2020-03-05	LCF	Assist with finalizing Opposition to Wells Fargo's Motion for Partial Summary Judgment, including review revised draft and accept edits, as well as assist with updating citations and circulate updated draft and analyze final draft; work on Request for Judicial Notice to be filed with Opposition, draft motion, gather relevant exhibits for Request, and send documents and exhibits to Ms. Lam to finalize and file	5.1	\$425	\$ 2,167.50
2020-03-05	JJB	Research, revise, cite-check and prepare for filing opposition to motion for partial summary judgment	6.3	\$580	\$ 3,654.00
2020-03-05	LPL	Edit, finalize, and file opposition to Wells Fargo's motion for partial summary judgment	8.9	\$465	\$ 4,138.50
2020-03-05	MLS	Work on MSJ opp to finalize for filing;	12.5	\$800	\$ 10,000.00
2020-03-06	LPL	Call with co-counsel re: reviewing filing of opp. to motion for partial summary judgment for errors	0.2	\$465	\$ 93.00
2020-03-12	JJB	Review and analyze Wells Fargo reply brief in support of motion for partial summary judgment	0.6	\$580	\$ 348.00
		Project Total:	131.8		\$ 71,931.00
Project: Opp. to Wells Fargo's motion to stay pending Rule 23(f) petition					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-02-19	JJB	Review and analyze Wells Fargo's motion for stay pending 23(f)	0.8	\$580	\$ 464.00
2020-02-20	MLS	Emails re J. Bloomfield re motion to stay opp.	0.2	\$800	\$ 160.00
2020-02-20	JJB	Research re motions to stay pending resolution of 23(f) petition	1.4	\$580	\$ 812.00
2020-02-25	JJB	Research and drafting of opposition to motion for stay	1.8	\$580	\$ 1,044.00
2020-02-27	JJB	Review and analyze Wells Fargo motion to shorten time on motion to stay	0.4	\$580	\$ 232.00
2020-02-27	JJB	Research re Wells Fargo motion to shorten time on motion to stay	1.5	\$580	\$ 870.00
2020-02-27	JJB	Research and drafting of opposition to motion to stay	1.7	\$580	\$ 986.00

2020-02-28	JJB	Research and drafting of opposition to motion to stay	2.2	\$580	\$ 1,276.00
2020-03-01	JJB	Research and drafting of opposition to motion to short time on motion to stay	2.7	\$580	\$ 1,566.00
2020-03-02	LPL	Edit and finalize response to Wells Fargo's motion to shorten time on resolution of motion to stay proceedings; confer with M. Schrag re: same	0.7	\$465	\$ 325.50
2020-03-02	JJB	Revise, finalize and file notice of non-opposition to motion to shorten time on motion for stay	1.6	\$580	\$ 928.00
2020-03-02	JJB	Research and drafting of opposition to motion for stay	3.4	\$580	\$ 1,972.00
2020-03-03	JJB	Finalize and circulate draft opposition to motion for stay	1.2	\$580	\$ 696.00
2020-03-04	LCF	Assist with finalizing Opposition to Wells Fargo's Motion to Stay Proceedings Pending Appeal, including review and provide edits to final draft of the same	0.2	\$425	\$ 85.00
2020-03-04	JJB	Finalize and file opposition to motion to stay	1.5	\$580	\$ 870.00
2020-03-04	MLS	work on Opp. to Stay-finalize and file; emails re same	2.2	\$800	\$ 1,760.00
2020-03-04	LPL	Edit and finalize Plaintiffs' opp. to motion to stay proceedings pending Rule 23(f); confer with M. Schrag re: same	2.4	\$465	\$ 1,116.00
2020-03-05	JJB	Review, revise and file opposition to 23(f) petition	1.6	\$580	\$ 928.00
2020-03-09	JJB	Review and analyze reply brief in support of motion to stay	0.4	\$580	\$ 232.00
2020-03-14	JJB	Emails with co-counsel re hearing on motion to stay	0.4	\$580	\$ 232.00
2020-03-14	JJB	Review pleadings and cases in preparation for same	1.9	\$580	\$ 1,102.00
2020-03-15	JJB	Emails with L. Lam re hearing on motion to stay	0.2	\$580	\$ 116.00
2020-03-15	LPL	E-mails with J. Bloomfield and co-counsel L. Fellows re: upcoming hearing on motion to stay case pending Rule 23(f) petition	0.2	\$465	\$ 93.00

2020-03-16	LPL	Confer with L. Fellows re: hearing on motion to stay case pending Rule 23(f) petition; possible telephonic hearing	0.3	\$465	\$ 139.50
2020-03-16	LCF	Work on setting telephonic conference for Motion to Stay hearing on Thursday, including correspond with opposing counsel regarding the same, and review Court Order setting all hearings by phone	0.3	\$425	\$ 127.50
		Project Total:	31.2		\$ 18,132.50
Project: Settlement agreement					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-03-02	GRB	Conferred with other attorneys regarding status of case and plans for moving forward with settlement agreement and researching potential settlement structure	0.4	\$275	\$ 110.00
2020-03-04	GRB	Conferred with supervising attorney regarding status of my settlement chart and planned for what to include in the chart and how to prepare chart for use in drafting potential settlement motion	1.6	\$275	\$ 440.00
2020-03-04	GRB	Continued researching Judge Alsup settlement procedure and compiled detailed chart with information and rationale behind different Judge Alsup class settlement agreements	6.7	\$275	\$ 1,842.50
2020-03-05	EHG	Call with team regarding settlement status	0.4	\$910	\$ 364.00
2020-03-05	LPL	Call with co-counsel and defense counsel re: negotiating remainder of settlement terms and call with Judge Ryu	0.4	\$465	\$ 186.00
2020-03-05	LPL	Confer with M. Schrag and co-counsel re: settlement in principle with Wells Fargo	0.4	\$465	\$ 186.00
2020-03-05	RMP	Work on settlement term sheet and strategy to finalize	1	\$725	\$ 725.00
2020-03-05	MLS	conf. call WF attys to discuss settlement and next steps; draft Term Sheet; conf. E. Gibbs re same; conf. L Lam re all this.	1.5	\$800	\$ 1,200.00

2020-03-05	LCF	Draft Settlement Term Sheet review and incorporate edits from Mr. Schrag, and send draft to Wells Fargo's counsel; receive update regarding Wells Fargo's acceptance of mediator's proposal and potential resolution of Class claims and begin to outline and analyze next steps, including participate in planning call with Wells Fargo's counsel regarding next steps and setting further call with Magistrate Ryu for guidance	1.7	\$425	\$ 722.50
2020-03-05	GRB	Finished completing research chart summarizing recent class settlements from Judge Alsup	5.3	\$275	\$ 1,457.50
2020-03-06	EHG	c/w MLS re status of settlement, discuss addressing non-settled clients and preliminary approval approach	0.3	\$910	\$ 273.00
2020-03-06	MLS	Settlement Agreement: work on MOU and review draft notice of settlement and emails re same;	1.2	\$800	\$ 960.00
2020-03-09	LPL	Review and analyze recent CIT chart that includes remediation payments to each class member	0.4	\$465	\$ 186.00
2020-03-09	LPL	Calls with co-counsel and defense counsel re: settlement terms and proposed allocation plan	0.9	\$465	\$ 418.50
2020-03-09	MLS	Meet/confer def counsel re settlement terms; tel calls R.Paul, B. Kelley re same; research neutral allocation experts;. call D. Salah re allocation mode; review updated CIT chart re updated remediation payments	2	\$800	\$ 1,600.00
2020-03-09	RMP	Work on settlement allocation	2.2	\$725	\$ 1,595.00
2020-03-10	LPL	Call with defense counsel re: remaining settlement terms to be discussed	0.4	\$465	\$ 186.00

2020-03-10	MLS	Conf. call def. counsel re settlement terms; legal research re prelim approval (review J. Alsup cases); review/edit prelim approval draft; conf. L. Lam re same; email R. Paul re same; research re allocation plans in other settlements; conf. S. Tindall re same; emails Team re prelim approval brief; tel. call C. Yanni and D. Agretelis re special master role in emotional distress distribution; conf. E. Gibbs re same; tel. call D. Stein and L. Lam re facebook prelim approval and comparison to this case	6.2	\$800	\$ 4,960.00
2020-03-11	RMP	Work on settlement issues regarding allocation plan and release language	0.7	\$725	\$ 507.50
2020-03-11	RMP	Work on settlement issues regarding allocation plan and release language	1.2	\$725	\$ 870.00
2020-03-11	RPN	Review damage information for submission in settlement	1.7	\$230	\$ 391.00
2020-03-11	MLS	Conf. call def. counsel re settlement terms; tel. calls and emails D. Salah re allocation method; review Salah allocation spreadsheets--legal research re same; tel. call R. Paul re same and other potential allocation methodologies; tel. call and emails L. Fellows re allocation--review her spreadsheet	2.8	\$800	\$ 2,240.00
2020-03-11	LCF	Begin to work on potential allocation of settlement funds, including continue to research sample cases regarding allocation of settlement and outline thoughts regarding the same; participate in call with Ms. Groves and Ms. Brinson regarding settlement agreement and continue to meet and confer regarding specific terms	4.3	\$425	\$ 1,827.50
2020-03-12	LCF	Review and respond to correspondence from Wells Fargo regarding status of their review and potential timeline to produce class member loan files	0.1	\$425	\$ 42.50

2020-03-12	KDJ	Work on settlement distribution calculations	1	\$250	\$ 250.00
2020-03-12	RMP	Work on settlement agreement and allocation plan	2	\$725	\$ 1,450.00
2020-03-12	MLS	draft email Team re allocation plan options; emails D. Salah re same; review draft settlement agreement sent by WF;	3.2	\$800	\$ 2,560.00
2020-03-12	AGS	Build and analyze various settlement allocation formulas	3.3	\$575	\$ 1,897.50
2020-03-12	LCF	Continue work on potential allocation of settlement funds, including continue to research sample cases regarding allocation of settlement and outline thoughts regarding the same, as well as work on various iterations of proposed allocations to find most equitable distribution, as well as receive update regarding status of settlement agreement negotiations	4.3	\$425	\$ 1,827.50
2020-03-12	LPL	Draft notice of class action settlement	5.9	\$465	\$ 2,743.50
2020-03-13	LPL	E-mails with team re: different proposed settlement allocation plans	0.2	\$465	\$ 93.00
2020-03-13	KDJ	Work on distribution calculations	0.4	\$250	\$ 100.00
2020-03-13	AGS	Draft proposed revisions to settlement agreement to provide to defense counsel	1.8	\$575	\$ 1,035.00
2020-03-13	RMP	Draft settlement agreement; work on plan of allocation	3.5	\$725	\$ 2,537.50
2020-03-13	LCF	Continue work on potential allocation of settlement funds, including continue work on various iterations of proposed allocations to find most equitable distribution	3.7	\$425	\$ 1,572.50
2020-03-13	LPL	Continue drafting notice of class settlement	4.6	\$465	\$ 2,139.00
2020-03-13	MLS	review/edit settlement agreement; meet/confer defense counsel re settlement terms and allocation plan; work on allocation plan; draft email to Judge Ryu	4.7	\$800	\$ 3,760.00
2020-03-14	AGS	Continue analyzing and revising proposed settlement agreement and allocation formula	0.6	\$575	\$ 345.00

2020-03-14	RMP	Draft settlement agreement and motion for preliminary approval; work on plan of allocation	4.4	\$725	\$ 3,190.00
2020-03-14	LCF	Continue to outline and analyze potential settlement allocations, including research information from prior settlements related to loss mitigation errors, and run various proposed allocations and outline thoughts regarding equity of proposed distribution(s)	6.5	\$425	\$ 2,762.50
2020-03-15	KDJ	Work on distribution calculations	0.3	\$250	\$ 75.00
2020-03-15	LPL	Review and analyze co-counsel's proposed plan of allocation of settlement among class members	0.4	\$465	\$ 186.00
2020-03-15	LPL	Calls with M. Schrag and co-counsel re: details of proposed plan of allocation of settlement	1.3	\$465	\$ 604.50
2020-03-15	LCF	Continue to outline and analyze potential settlement allocations and run various proposed allocation; outline thoughts regarding equity of proposed distribution(s)	2.8	\$425	\$ 1,190.00
2020-03-15	RMP	Work on plan of allocation	3.2	\$725	\$ 2,320.00
2020-03-16	KDJ	Work on distribution calculations	0.2	\$250	\$ 50.00
2020-03-16	LPL	Conf. call with team and expert Dan Salah re: proposed allocation plan	0.4	\$465	\$ 186.00
2020-03-16	LCF	Continue to analyze potential settlement payment allocation and next steps to finalize settlement pleadings	0.5	\$425	\$ 212.50
2020-03-16	RMP	Work on settlement agreement and plan of allocation	2.5	\$725	\$ 1,812.50
2020-03-16	MLS	conf. call WF counsel re allocation plan; email J. Ryu re same; review allocation plan spreadsheet, emails E. Gibbs and D. Salah re same; conf call D. Salah and R. Paul re same; email C. Gianni re special master role; emails L. Lam re lodestar audit and Alsup cases re preliminary approval and time reporting	6.2	\$800	\$ 4,960.00
2020-03-17	LPL	E-mails with team re: possibility of a Wells Fargo employee being excluded from the class	0.2	\$465	\$ 93.00

2020-03-17	MLS	review WF edits to settlement agreement and tel. call R. Paul re same; conf. call WF counsel re same;	2.7	\$800	\$ 2,160.00
2020-03-18	LPL	Review and analyze latest version of draft plan of allocation of settlement	0.2	\$465	\$ 93.00
2020-03-18	RMP	Work on settlement agreement; conference call with opposing counsel re settlement agreement	0.5	\$725	\$ 362.50
2020-03-19	JJB	Research re proposed settlement allocations	0.2	\$580	\$ 116.00
2020-03-19	LPL	Call with class rep Debora Granja and M. Schrag to update her on finalizing settlement agreement and allocation plan	0.3	\$465	\$ 139.50
2020-03-19	LCF	Continue to analyze allocation plan and outline thoughts regarding strength of the same	0.8	\$425	\$ 340.00
2020-03-20	MLS	review L. Fellows edits to settlement agreement, allocation plan, conf. call WF counsel re settlement agreement negotiations/edits;	2.5	\$800	\$ 2,000.00
2020-03-21	RMP	Review Settlement Agreement and emotional distress damages claim form	0.4	\$725	\$ 290.00
2020-03-21	MLS	review settlement agreement and draft punch list of edits in prep for sunday call with WF counsel; review/edit allocation plan;	1.7	\$800	\$ 1,360.00
2020-03-22	MLS	conf. call R. Paul and defense counsel re settlement agreement terms; review settlement agreement draft	1.7	\$800	\$ 1,360.00
2020-03-22	RMP	Conference call with opposing counsel to work on settlement agreement and allocation plan; prepare for call	1.9	\$725	\$ 1,377.50
2020-03-22	LCF	Continue to work on preliminary approval pleadings and finalizing settlement, including analyze draft of settlement agreement and deadlines/dates proposed in the same, create chart to draft deadlines, and outline thoughts regarding discrepancies and other changes needed to settlement agreement	3.5	\$425	\$ 1,487.50

2020-03-23	MLS	review/edit settlement agreement and allocation plan; telephonic negotiations w/ defense counsel re same (particularly re proposed cap and adding 7 borrowers to the class); tel. calls E. Gibbs and R. Paul re allocation model (particularly the proposed cap);	2.5	\$800	\$ 2,000.00
2020-03-23	RMP	Work on allocation plan; negotiate settlement agreement with opposing counsel	4.7	\$725	\$ 3,407.50
2020-03-24	LPL	Call to Judge Ryu's clerk re: setting up call with all parties to discuss one final term of settlement agreement	0.1	\$465	\$ 46.50
2020-03-24	JJB	Call with M. Schrag and S. Campos	0.3	\$580	\$ 174.00
2020-03-24	LCF	Continue to work on draft Settlement Agreement, including review and analyze most recent edits from Wells Fargo and outline thoughts regarding the same	1.1	\$425	\$ 467.50
2020-03-24	RMP	Draft settlement agreement; work on final deal points	2.3	\$725	\$ 1,667.50
2020-03-24	MLS	multiple emails and tel. calls R. Paul, WF counsel and E. Gibbs re settlement negotiations re allocation plan; review R. Paul edits to settlement agreement; email to J. Ryu re allocation plan; review WF edits to settlement agreement;	3.8	\$800	\$ 3,040.00
2020-03-24	LCF	Continue to work on draft Allocation Plan and finalizing the same to attach to the Settlement Agreement, including correspond with Wells Fargo's counsel regarding Allocation Plan, review and analyze Wells Fargo's proposed edits to the Allocation Plan	4	\$425	\$ 1,700.00
2020-03-25	JJB	Calls with S. Campos re execution of settlement agreement	0.2	\$580	\$ 116.00
2020-03-25	LPL	Call with class rep Debora Granja to answer her questions about the settlement agreement; e-mail settlement agreement to class reps and counsel for their signatures	1.3	\$465	\$ 604.50

2020-03-25	RMP	Finalize Settlement Agreement and Allocation Plan; conference call with Judge Ryu	4.6	\$725	\$ 3,335.00
2020-03-25	MLS	negotiate allocation plan; multiple tel. calls and emails WF counsel, R. Paul, L. Fellows and L. Lam. tel. call D. Salah; review WF "corrected" model and check w/ D. Salah to figure out it was in fact wrong. emails and tel. calls J. Ryu re same; review/edit Settlement agreement to correct timing/dates for all settlement tasks--tel. calls L. Fellows re same; conf. call A. Mura and R. Paul re Prelim	6.2	\$800	\$ 4,960.00
2020-03-25	LCF	Continue to work on finalizing settlement; work to finalize settlement agreement, including proofread and edit draft, analyze proposed dates for settlement administration and create chart to track the same, begin to redline agreement to reflect updated dates and correspond with counsel for Wells Fargo regarding dates; continue to work on allocation plan, including review alternative proposals from Wells Fargo and outline and analyze thoughts regarding same	7.4	\$425	\$ 3,145.00
2020-03-26	LPL	E-mails with team and defense counsel re: getting fully executed version of settlement agreement	0.1	\$465	\$ 46.50
2020-04-08	LPL	E-mails with defense counsel re: discrepancy between remediation amounts that certain class members received and amounts that Wells Fargo's CIT chart states they received	0.4	\$465	\$ 186.00
2020-04-09	LPL	E-mails with defense counsel re: auditing class members' remediation amounts for allocation plan and understanding why some borrowers were later determined "not impacted"	0.4	\$465	\$ 186.00

2020-04-10	LPL	Research into whether Alicia Hernandez's home was sold in foreclosure by Wells Fargo (and thus whether she is a class member); e-mails with defense counsel re: same	1.1	\$465	\$ 511.50
2020-04-10	JJB	Call with defense counsel, M. Schrag, and L. Lam re class member remediation amounts and class member determination	1.2	\$580	\$ 696.00
2020-04-10	MLS	conf. call WF counsel re CIT Chart/class list: A. Hernandez and other service transfers; review foreclosure docs re Hernandez; conf. call team re discussion w/ class members and non-impacted clients	2	\$800	\$ 1,600.00
2020-04-12	MLS	review settlement agreement, email notes re same to R. Paul;	0.8	\$800	\$ 640.00
2020-04-13	LPL	Conf. call with defense counsel and co-counsel re: research on borrowers who had service transfers and whether they are class members after all	1.1	\$465	\$ 511.50
2020-04-14	LPL	E-mails with M. Schrag and defense counsel re: progress on determining whether "service transfer" borrowers should be included in the class	0.4	\$465	\$ 186.00
2020-04-14	LPL	Conf. call with team and defense counsel re: finalizing class member list and research into borrowers who were labeled as "service transfer"	1	\$465	\$ 465.00
2020-04-15	LPL	E-mails with defense counsel re: updated class list / CIT chart	0.2	\$465	\$ 93.00
2020-04-15	LPL	Calls with co-counsel L. Fellows, R. Paul, and M. Schrag re: further research on impacted borrowers who had a service transfer and whether they should be included in the class	1.5	\$465	\$ 697.50
2020-04-21	LPL	E-mails with co-counsel L. Fellows re: obtaining updated CIT chart with final class list and data on class members from Wells Fargo	0.2	\$465	\$ 93.00
2020-04-27	LPL	Call with co-counsel L. Fellows re: getting updated CIT chart from defense counsel and finalizing class member list	0.4	\$465	\$ 186.00

		Project Total:	177.6		\$ 105,090.50
Project: Opp. to motion to sever					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-03-23	LPL	Review and analyze Wells Fargo's motion to sever in preparation for drafting response brief	0.4	\$465	\$ 186.00
2020-03-23	LPL	Conf. call with team re: drafting opposition to Wells Fargo's motion to sever	0.6	\$465	\$ 279.00
2020-03-23	LPL	Prepare stipulation, declaration, and proposed order for extension on briefing deadlines for Wells Fargo's motion to sever	0.7	\$465	\$ 325.50
2020-03-23	LPL	Legal research for opp. to Wells Fargo's motion to sever	0.8	\$465	\$ 372.00
2020-03-23	LCF	Work on Opposition to Motion to Sever, including begin to outline and analyze argument regarding the same and begin to research and analyze cases cited by Wells Fargo; assist with draft extension of time to file Opposition to the Motion to Sever, including review local rules and outline thoughts regarding draft extension and proofread and edit draft	2	\$425	\$ 850.00
2020-03-23	JJB	Begin research re opposition to motion to sever	3.3	\$580	\$ 1,914.00
2020-03-24	LCF	Continue to work on Opposition to Motion to Sever, including finish research and analysis of cases regarding alleged prejudice, and draft proposed section in response to the same	1	\$425	\$ 425.00
2020-03-24	LPL	Draft opposition to motion to sever individual claims from the class claims; e-mails with co-counsel L. Fellows re: same	3.8	\$465	\$ 1,767.00
2020-03-24	JJB	Research and draft permissive joinder section of opposition to motion to sever	5.1	\$580	\$ 2,958.00
2020-03-26	JJB	Consolidate draft of motion to sever	0.4	\$580	\$ 232.00

2020-03-28	LPL	E-mails with team re: opposition to motion to sever individual claims from class claims	0.2	\$465	\$ 93.00
		Project Total:	18.3		\$ 9,401.50
Project: Motion for preliminary approval					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-02-27	NRL	Researched claim splitting issue and review prior research on claim splitting issue; draft memorandum with relevant case law and brief points arguing why claim splitting most likely does not apply in this matter	1.2	\$275	\$ 330.00
2020-03-02	GRB	Researched settlement procedures and strategies for Judge Alsup and 9th Circuit and compiled document summarizing findings	6.9	\$275	\$ 1,897.50
2020-03-03	LCF	Continue to work on preparing Motion for Preliminary Approval/settlement approval generally, including review initial research from Mr. Brand and further instruct Mr. Brand regarding research needed regarding settlement requirements	0.2	\$425	\$ 85.00
2020-03-04	LCF	Continue to work on preparing Motion for Preliminary Approval/settlement approval generally, including research opinions from Judge Alsup regarding settlement and specific information needed; further instruct Mr. Brand regarding research needed regarding settlement requirements and forward additional cases/opinions for Mr. Brand to review and analyze	1.3	\$425	\$ 552.50
2020-03-05	LPL	Draft notice of settlement to be filed with the court	0.3	\$465	\$ 139.50
2020-03-05	LCF	Continue to work on preparing Motion for Preliminary Approval, including review final chart with information regarding Judge Alsup's settlement approval process and information needed send further cases for Mr. Brand to incorporate/research	0.5	\$425	\$ 212.50

2020-03-05	GRB	Began work on drafting preliminary motion for class settlement	1.2	\$275	\$ 330.00
2020-03-06	AGS	Pull prior settlement pleadings in California for beginning drafting of settlement approval paperwork	0.2	\$575	\$ 115.00
2020-03-06	LPL	E-mails with co-counsel and M. Schrag re: drafting motion for preliminary approval	0.3	\$465	\$ 139.50
2020-03-06	RMP	Work on motion for preliminary approval of settlement; analyze settlement structure; conference call with Judge Ryu regarding settlement	3	\$725	\$ 2,175.00
2020-03-09	MLS	Review Alsup prior prelim approval cases and Facebook prelim approval papers; review ND Cal. guidelines; draft memo re checklist for prelim approval	0.6	\$800	\$ 480.00
2020-03-09	LPL	Research re: recent N.D. Cal. class settlements for motion for preliminary approval	2.7	\$465	\$ 1,255.50
2020-03-09	RPN	Review damage information for submission in settlement	3.9	\$230	\$ 897.00
2020-03-09	GRB	Continued working with Laura Fellows to research and draft motion for preliminary settlement agreement	6.6	\$275	\$ 1,815.00
2020-03-10	RPN	Review damage information for submission in settlement	0.2	\$230	\$ 46.00
2020-03-10	LPL	Call with M. Schrag and D. Stein re: similar preliminary approval briefs GLG has done, and how they relate to our WF preliminary approval papers	0.6	\$465	\$ 279.00
2020-03-10	GRB	Reviewed draft of preliminary motion for settlement and compiled research	1.2	\$275	\$ 330.00
2020-03-10	LPL	Edit draft motion for preliminary approval	1.6	\$465	\$ 744.00
2020-03-10	LPL	Review and analyze draft motion for preliminary approval; confer with M. Schrag about edits to make to the motion	1.7	\$465	\$ 790.50
2020-03-10	RMP	Draft motion for preliminary approval of settlement	2.6	\$725	\$ 1,885.00
2020-03-10	LPL	Legal research re: preliminary approval orders in N.D. Cal. for preliminary approval brief in this case	2.9	\$465	\$ 1,348.50

2020-03-11	LPL	Call with M. Schrag re: reviewing and preparing lodestar for presentation to the Court on fee motion	0.3	\$465	\$ 139.50
2020-03-11	RPN	Review damage information for submission in settlement	1.2	\$230	\$ 276.00
2020-03-11	MLS	Legal research re preliminary approval and final approval issues; work on motion for prelim approval motion; tel. calls L. Lam re same;	3	\$800	\$ 2,400.00
2020-03-11	LPL	Edits to draft motion for preliminary approval	6.9	\$465	\$ 3,208.50
2020-03-12	MLS	Work on prelim approval brief	1.5	\$800	\$ 1,200.00
2020-03-13	GRB	Researched Judge Alsup's recent rulings on incentive fees for lead plaintiffs in preparation for motion for settlement	1.6	\$275	\$ 440.00
2020-03-13	MLS	Work on preliminary approval brief--review cases	2.8	\$800	\$ 2,240.00
2020-03-13	LPL	Edits to motion for preliminary approval of settlement; e-mails with team re: same	3.6	\$465	\$ 1,674.00
2020-03-14	LPL	E-mails with M. Schrag re: decisions on how much information to put on first page of draft class notice of settlement	0.3	\$465	\$ 139.50
2020-03-14	LPL	Draft declaration in support of motion for preliminary approval of settlement	3.5	\$465	\$ 1,627.50
2020-03-14	MLS	Work on Preliminary approval brief, allocation plan, class notice and prelim approval declaration. conf. call Team re same; emails re same	4.5	\$800	\$ 3,600.00
2020-03-15	LCF	Begin to prepare attorney fee records for submission, including review and analyze contemporaneous billing records in accordance with Judge Alsup's Order requesting fees be arranged by task(s) in preparation for exercise of billing judgment	0.8	\$425	\$ 340.00
2020-03-15	MLS	Conf. calls team re class notice, allocation plan; review/edit class notice; review/edit allocation spreadsheets; review/edit prelim approval declaration	3.7	\$800	\$ 2,960.00

2020-03-16	LPL	E-mail to co-counsel re: preparing Paul declaration in support of motion for preliminary approval	0.2	\$465	\$ 93.00
2020-03-16	LPL	Edits to class litigation notice to send to administrator; e-mail to M. Schrag re: same	0.4	\$465	\$ 186.00
2020-03-16	LPL	E-mails with J. Bloomfield and L. Fellows re: citing certain facts about the case in the preliminary approval brief	0.4	\$465	\$ 186.00
2020-03-16	LPL	E-mails with team re: preparing lodestar for preliminary approval motion	0.4	\$465	\$ 186.00
2020-03-16	JJB	Emails with co-counsel	0.5	\$580	\$ 290.00
2020-03-16	LPL	Edits to Schrag declaration in support of preliminary approval motion	0.5	\$465	\$ 232.50
2020-03-16	JJB	Review case information for Schrag declaration in support of motion for preliminary approval	0.8	\$580	\$ 464.00
2020-03-16	LPL	Begin reviewing all GLG time entries in the case to scrub lodestar for preliminary approval motion	2.7	\$465	\$ 1,255.50
2020-03-17	JJB	Emails with co-counsel	0.3	\$580	\$ 174.00
2020-03-17	LPL	E-mails with J. Bloomfield and L. Fellows re: facts regarding what we did in the case to include in preliminary approval brief	0.3	\$465	\$ 139.50
2020-03-17	LPL	Review and trim firm lodestar for presentation at preliminary approval stage: e-mails with M. Schrag re: same	2.7	\$465	\$ 1,255.50
2020-03-17	RMP	Draft declaration in support of preliminary approval; work on plan of allocation; work on revisions to settlement agreement and motion for preliminary approval	2.7	\$725	\$ 1,957.50
2020-03-17	GRB	Researched Emotional Distress Fund claim form procedure and began drafting sample notice to be included in class settlement notice form	2.8	\$275	\$ 770.00

2020-03-17	MLS	Emails L. Lam re case costs and lodestar audit; legal research: review J. Alsop cases re preliminary approval; emails Team re same; work on Proposed Order, R. Paul declaration, work on Allocation Plan, and emotional distress claim form	5.3	\$800	\$ 4,240.00
2020-03-17	LCF	Continue to work on proposed settlement pleadings, including draft proposed allocation plan, analyze and work on draft claim form for emotional distress fund, draft proposed order granting preliminary approval, and draft and edit declaration for Mr. Paul in support of preliminary approval	7.6	\$425	\$ 3,230.00
2020-03-18	LPL	Call with co-counsel L. Fellows re: status of each part of preliminary approval motion papers, and next steps on each part	0.3	\$465	\$ 139.50
2020-03-18	JJB	Emails with co-counsel	0.5	\$580	\$ 290.00
2020-03-18	LCF	Continue to work on preparing preliminary approval pleadings, including revise draft of emotional distress claim form, analyze sample form from USC case	1	\$425	\$ 425.00
2020-03-18	LPL	Edits to Schrag declaration ISO preliminary approval motion (to add prior experience in noteworthy cases)	1.5	\$465	\$ 697.50
2020-03-18	LCF	Continue to work on preliminary approval pleadings, including continue to work on draft allocation plan, revise draft to include step by step analysis	2.7	\$425	\$ 1,147.50
2020-03-18	MLS	Work on preliminary approval brief; work on claim form for severe emotional distress; review cases re preliminary approval; review J. Bloomfield memo re projected client recovery; tel. call J. Bloomfield re same	5.2	\$800	\$ 4,160.00
2020-03-19	LCF	Continue to work on draft Emotional Distress Claim Form, including revise draft to include additional instructions and truncate questions	0.2	\$425	\$ 85.00

2020-03-19	LPL	E-mails with A. Mura re: relevant Alsup cases to review in preparation for preliminary approval	0.2	\$465	\$ 93.00
2020-03-19	LPL	E-mails with team re: what types of tasks to cut from lodestar for preliminary approval brief	0.2	\$465	\$ 93.00
2020-03-19	RMP	Draft Allocation Plan; work on settlement approval papers	2.3	\$725	\$ 1,667.50
2020-03-19	LPL	Review and make cuts to GLG time to calculate lodestar to include in preliminary approval brief	3.8	\$465	\$ 1,767.00
2020-03-19	MLS	Work on prelim approval brief; work on class notice; tel. call L. Lam re auditing lodestar; emails L. Lam and L. Fellows re same; research re Neigborworks proposed cy pres recipient ; work on allocation plan and emails D. Salah re same; edit emotional distress claim form -email L. Fellows re same; tel. call D. Granja re settlement status	6.7	\$800	\$ 5,360.00
2020-03-20	LPL	Gather information and calculate GLG's costs to date on the case	0.4	\$465	\$ 186.00
2020-03-20	MLS	work on prelim approval: review cases work on class notice (review R. Paul edits) and send to WF counsel; draft email re status of prelim approval papers; work on allocation plan	2.2	\$800	\$ 1,760.00
2020-03-20	LPL	Review and cut GLG time on the case to calculate lodestar to include in preliminary approval brief	3.1	\$465	\$ 1,441.50
2020-03-20	RMP	Draft Allocation Plan and motion for preliminary approval of settlement; analyze edits to settlement agreement and class notice	4.7	\$725	\$ 3,407.50

2020-03-20	LCF	Continue to work on Motion for Preliminary Approval, including revise draft, analyze and outline thoughts regarding Judge Alsup's factors for preliminary approval and Northern District of California rules regarding preliminary approval; revise draft Allocation Plan, including incorporate edits from Wells Fargo and outline thoughts regarding the same	5.4	\$425	\$ 2,295.00
2020-03-21	MLS	Review/edit prelim approval brief and email A. Mura re same	0.7	\$800	\$ 560.00
2020-03-21	LPL	Go through GLG time on the case to scrub lodestar for preliminary approval motion	1.8	\$465	\$ 837.00
2020-03-22	MLS	Review/edit emotional distress claim form	0.5	\$800	\$ 400.00
2020-03-22	LPL	Go through GLG time on the case to scrub lodestar for preliminary approval motion	2.7	\$465	\$ 1,255.50
2020-03-23	LPL	E-mails with team re: projected amount of net settlement fund after subtracting fees, costs, and service awards	0.2	\$465	\$ 93.00
2020-03-23	LPL	Continue going through GLG time to scrub lodestar for preliminary approval motion	3.8	\$465	\$ 1,767.00
2020-03-23	MLS	Work on prelim approval declaration; conf. call C. Yanni and D. Agretelis re emotional distress fund; email JND and Yanni re same; review J. Bloomfield mediation analysis and related emails; conf. call re motion to sever opp.; review/edit stipulation and and declaration re extension on briefing schedule	4	\$800	\$ 3,200.00
2020-03-24	LPL	E-mails with co-counsel re: draft stipulation for dismissal with prejudice of the Simoneaux's claims	0.4	\$465	\$ 186.00
2020-03-24	LPL	E-mails with M. Schrag and E. Gibbs re: trimming lodestar for preliminary approval motion; calculate amount of lodestar that firm is trimming	0.4	\$465	\$ 186.00

2020-03-24	LPL	Finalize and file stipulation to dismiss the Simoneaux's claims without prejudice	0.5	\$465	\$ 232.50
2020-03-24	MLS	mails and tel. calls re class notice and motion to sever issues	0.8	\$800	\$ 640.00
2020-03-24	LPL	Edits to Schrag declaration in support of motion for preliminary approval	0.9	\$465	\$ 418.50
2020-03-24	MLS	Tel. call A. Mura re prelim approval brief ; review Heffler declaration re class notice; review lodestar and LPL suggested cuts; tel. call L. Lam re same; review/edit allocation plan emails WF counsel re same; review WF emails about purported error in allocation model tel. call D. Salah re same	2	\$800	\$ 1,600.00
2020-03-25	LPL	Prepare notice of settlement; e-mails with M. Schrag re: same	0.5	\$465	\$ 232.50
2020-03-25	LPL	Call with co-counsel L. Fellows re: schedule in settlement agreement and examples of class member recovery to insert to preliminary approval brief	0.5	\$465	\$ 232.50
2020-03-25	LPL	Begin analyzing class members who are receiving high/medium/low payments from the settlement to explain examples in preliminary approval brief	0.5	\$465	\$ 232.50
2020-03-25	LPL	Further edits to Schrag declaration in support of preliminary approval motion	0.6	\$465	\$ 279.00
2020-03-25	LPL	Edits to facts and litigation history sections of preliminary approval brief; send draft brief to defense counsel	1.6	\$465	\$ 744.00
2020-03-25	LPL	Conference call with M. Schrag and co-counsel re: settlement agreement dates, preliminary approval brief, and Cathy Yanni's declaration	1.7	\$465	\$ 790.50
2020-03-25	MLS	approval brief; review L. Lam edits to same and send to WF counsel; emails Heffler re Covid-19 declaration; review/edit notice of settlement and Rapazzini declaration; review/edit final allocation plan	2.5	\$800	\$ 2,000.00
2020-03-26	RPN	Review settlement plan to ensure accuracy of days delinquent discount	0.1	\$230	\$ 23.00

2020-03-26	LPL	E-mail to team re: writing assignments for motion for preliminary approval and opp. to motion to sever	0.4	\$465	\$ 186.00
2020-03-26	LPL	Call with defense counsel re: Wells' need to file notice of settlement tomorrow rather than today	0.4	\$465	\$ 186.00
2020-03-26	LPL	E-mails with team re: draft notice of settlement and request for continuance of notice deadline; draft proposed order for the same	0.8	\$465	\$ 372.00
2020-03-26	LPL	Calls with A. Mura and M. Schrag re: additional areas of research and writing for motion for preliminary approval	0.9	\$465	\$ 418.50
2020-03-26	RMP	Work on motion for preliminary approval of settlement and allocation plan; conference call with opposing counsel re: class notice issues	1.9	\$725	\$ 1,377.50
2020-03-26	LCF	Continue to work on Motion for Preliminary Settlement Approval, including analyze potential explanations of individual settlement awards and outline thoughts regarding the same, revise draft allocation explanation and send revised draft to Wells Fargo, revise draft Order Granting Motion for Preliminary Approval to incorporate updated dates and additional information and circulate draft	3.2	\$425	\$ 1,360.00
2020-03-26	LCF	Continue to work on approval pleadings, including revise draft Order Granting Motion for Preliminary Approval to incorporate updated dates and add additional detail regarding settlement administration; continue to work on final allocation plan and damages spreadsheet, including confirm correct discounts for delinquency, correspond with Mr. Salah regarding formulas and confirm correct; correspond with Wells Fargo regarding next steps to finalize approval pleadings and timing regarding the same	3.9	\$425	\$ 1,657.50

2020-03-26	LPL	Draft section on examples of individual class member recoveries for motion for preliminary approval	4.3	\$465	\$ 1,999.50
2020-03-26	MLS	multiple tel conferences w/ Team and WF counsel re notice of settlement and continuing litigation class notice deadline; work on inserts to Prelim Approval brief re allocation plan and emotional distress fund; review nd cal guidelines; review/edit Yanni declaration; emails re Yanni retention; review WF edits to Prelim Approval brief and make further edits; review edit proposed orders to Notice of settlement and Prelim approval and send to WF; tel. calls L. Lam re adding examples of damage awards to brief	7.3	\$800	\$ 5,840.00
2020-03-27	JJB	Call with L. Lam re class representative service awards	0.1	\$580	\$ 58.00
2020-03-27	JJB	Call to S. Campos re class representative service awards	0.2	\$580	\$ 116.00
2020-03-27	LPL	Call with class rep Debora Granja re: not requesting a service award for her	0.2	\$465	\$ 93.00
2020-03-27	LPL	E-mails with L. Fellows re: completeness of class member allocation spreadsheet	0.3	\$465	\$ 139.50
2020-03-27	LPL	Calls with A. Karl and co-counsel re: research on types of releases that Judge Alsup has approved in other cases	0.5	\$465	\$ 232.50
2020-03-27	LPL	Edit, finalize, and file notice of settlement and request for continuance of litigation class notice deadline	0.7	\$465	\$ 325.50
2020-03-27	LPL	Review and analyze latest edits to motion for preliminary approval	0.8	\$465	\$ 372.00
2020-03-27	RMP	Work on motion papers in support of settlement	1.2	\$725	\$ 870.00
2020-03-27	LPL	Draft section on examples of individual class member recoveries for motion for preliminary approval; e-mails with team re: same	1.3	\$465	\$ 604.50

2020-03-27	MLS	work on notice of settlement; emails E. Gibbs, A. Mura, L. Lam re same, tel. calls L. Lam re same; emails WF counsel re 9th Cir. filing and press inquiry term of settlement agreement;	2.5	\$800	\$ 2,000.00
2020-03-27	MLS	work on preliminary approval brief--edit inserts re release term and allocation plan; conf. call Team re same and plan to finalize brief and supporting papers; review transcript from Luna prelim approval hearing; discuss foregoing service awards;work on Yanni Declaration--tel. call C. Yanni re same;	5	\$800	\$ 4,000.00
2020-03-27	LCF	Review and edit draft declaration for proposed special master, Ms. Yanni; draft revised section of Motion for Preliminary Approval regarding scope of the release, including research and incorporate relevant case law, proofread revised draft; continue to analyze additional changes to draft Motion for Preliminary Approval	7.4	\$425	\$ 3,145.00
2020-03-28	LPL	Edits to Schrag declaration in support of motion for preliminary approval	0.6	\$465	\$ 279.00
2020-03-28	RMP	Draft class notice; review draft of settlement administrator, JND, declaration in support of motion for preliminary approval of settlement; review draft of Michael Schrag declaration in support of motion for preliminary approval of settlement	0.9	\$725	\$ 652.50
2020-03-28	LCF	Continue to work on draft motion for preliminary approval, including work to ensure consistent citations, add citations to settlement agreement, revise service award section	1.8	\$425	\$ 765.00
2020-03-28	MLS	review/edit preliminary approval brief and send to A. Mura; work on preliminary approval declaration;	2.3	\$800	\$ 1,840.00
2020-03-29	JJB	Emails with L. Lam and M. Schrag re updating lodestar and costs for preliminary approval motion	0.4	\$580	\$ 232.00

2020-03-29	LPL	E-mails with J. Bloomfield and M. Schrag re: updating lodestar and costs for preliminary approval motion	0.4	\$465	\$ 186.00
2020-03-29	LPL	Further edits to Schrag declaration in support of motion for preliminary approval	0.4	\$465	\$ 186.00
2020-03-29	LPL	Work on updating firm costs and lodestar for preliminary approval filing	0.8	\$465	\$ 372.00
2020-03-29	LCF	Continue to prepare Motion for Preliminary Approval, including analyze status of finalizing various attachments and Motion, analyze questions regarding scope of release and other legal issues	0.9	\$425	\$ 382.50
2020-03-29	LPL	Conf. call with team re: revising motion for preliminary approval and supporting declaration/exhibits	0.9	\$465	\$ 418.50
2020-03-29	RMP	Work on motion for preliminary approval of settlement and declaration in support	2.4	\$725	\$ 1,740.00
2020-03-29	MLS	Conf. call Team to discuss open issues in prelim approval brief such as releasing non-certified claims and lining up brief w/ N.D. Guidelines (e.g. conveying sufficient info about settlement adm); review/edit Prelim Approval declaration; conf. call WF counsel to discuss notice declaration, class notice, yanni declaration, 9th cir, filing and Jpml filing	3.3	\$800	\$ 2,640.00
2020-03-30	KDJ	Review expenses for inclusion in motion for settlement approval and approval of attorney fees and costs	0.3	\$250	\$ 75.00
2020-03-30	LPL	Edits to proposed order to include with motion for preliminary approval	0.4	\$465	\$ 186.00
2020-03-30	LPL	E-mails with M. Schrag re: finalizing Yanni declaration and CV for motion for preliminary approval	0.4	\$465	\$ 186.00
2020-03-30	LPL	Calls with M. Schrag and A. Mura re: edits to draft motion for preliminary approval	0.7	\$465	\$ 325.50

2020-03-30	RMP	Draft class notice and declarations in support of motion for preliminary approval of settlement; review declaration from settlement administrator	2.4	\$725	\$ 1,740.00
2020-03-30	LPL	Further edits to Schrag declaration in support of motion for preliminary approval, including totaling up new lodestar and firm costs to date	3.1	\$465	\$ 1,441.50
2020-03-30	LPL	Edits to latest draft motion for preliminary approval; conf. calls with M. Schrag and co-counsel re: same	4.4	\$465	\$ 2,046.00
2020-03-30	LCF	Continue to finalize Motion for Preliminary Approval of Settlement and related pleadings, including review, analyze, and further edit draft of Mr. Schrag's declaration; review and update draft of Mr. Paul's declaration; analyze draft allocation plan and class member information; review and analyze similar settlements regarding loan modification denials and add further detail regarding same into the draft motion; revise draft of proposed order and include proposed chart outlining deadlines, including compare deadlines to settlement agreement	8.9	\$425	\$ 3,782.50
2020-03-30	MLS	emails re Yanni declaration and retention; review/edit proposed order and send to WF counsel; conf. call R. Paul and L. Fellows re timeline of events before final approval; work on my declaration; review J. Alsup prelim approval and final approval cases; review A. Mura turn on Prelim approval brief; conf. call A. Mura and L. Lam re same;	9.5	\$800	\$ 7,600.00
2020-03-31	KDJ	Work on distribution calculation spreadsheet; locate data to be included in motion to approve attorney fees	2.4	\$250	\$ 600.00
2020-03-31	LPL	Work on editing and finalizing declarations and supporting exhibits for motion for preliminary approval	5.2	\$465	\$ 2,418.00

2020-03-31	RMP	Draft motion to approve settlement agreement, declarations in support, claim form, and class notice	8.9	\$725	\$ 6,452.50
2020-03-31	LPL	Work on editing, finalizing, and filing motion for preliminary approval; calls with team re: edits to the same	11.5	\$465	\$ 5,347.50
2020-03-31	LCF	Finalize Motion for Preliminary Approval of Settlement, including proofread and check fact citations for final draft of Motion; finalize proposed Order, including exchange various drafts and proposed edits with Wells Fargo; finalize Mr. Paul's declaration, including finish updating lodestar and expenses; assist with finalizing Mr. Schrag's declaration, including updating lodestar and expenses; finalize class notice, including revise draft to update expenses and proposed attorney's fees, proofread final draft; finalize severe emotional distress claim form, including update to include signature page	13	\$425	\$ 5,525.00
2020-03-31	MLS	work on and finalize for filing preliminary approval brief, declaration, and proposed order, numerous emails and conf. calls w/ Team re same	13.5	\$800	\$ 10,800.00
2020-04-01	RMP	Review motion for preliminary approval; prepare for preliminary approval hearing	0.3	\$725	\$ 217.50
2020-04-03	RMP	Prepare for preliminary approval hearing	0.5	\$725	\$ 362.50
2020-04-03	KDJ	Prepare charts utilizing expert data and distribution spreadsheet	1.1	\$250	\$ 275.00
2020-04-03	LCF	Prepare to call clients to discuss settlement allocations and case status, including analyze settlement allocation for approximately 20 plaintiffs	1.3	\$425	\$ 552.50
2020-04-05	RMP	Work on communication plan to class members re: settlement	0.2	\$725	\$ 145.00
2020-04-06	RMP	Analyze allocation plan to prepare for preliminary approval hearing	1.4	\$725	\$ 1,015.00

2020-04-08	RMP	Phone conference with opposing counsel re: settlement issues; analyze information re: allocation from class members	1.2	\$725	\$ 870.00
2020-04-10	LCF	Continue to work on allocation and further refining and verifying accuracy of draft allocation plan, including outline thoughts regarding comparison of plan to damages alleged by Mr. Salah	0.8	\$425	\$ 340.00
2020-04-10	RMP	Prepare for hearing on motion for preliminary approval; review correspondence with opposing counsel re: information received from class members to confirm allocation plan	1.3	\$725	\$ 942.50
2020-04-12	RMP	Prepare for preliminary approval hearing	0.4	\$725	\$ 290.00
2020-04-13	JJB	Team call re preliminary approval hearing and class member outreach	0.5	\$580	\$ 290.00
2020-04-13	LPL	Conf. call with M. Schrag, J. Bloomfield, and team re: preparing for preliminary approval hearing, speaking with class members about the settlement, and resolving outstanding issues in advance of preliminary approval	0.5	\$465	\$ 232.50
2020-04-13	LPL	E-mails with team re: points to potentially raise at preliminary approval hearing; loose ends on questions about certain class members or possible class members	0.6	\$465	\$ 279.00
2020-04-13	RMP	Conference call with opposing counsel re: settlement issues; work on allocation plan adjustments; prepare for preliminary approval hearing	1.9	\$725	\$ 1,377.50
2020-04-13	LCF	Continue to prepare for hearing on Plaintiffs' Motion for Preliminary Approval, including analyze tasks to complete to prepare, review Motion, begin to analyze similar cases and compare values of settlements in those cases, begin to draft summary of allocation plan and talking points	3	\$425	\$ 1,275.00

2020-04-13	MLS	Prep for Prelim Approval hearing: review prelim approval papers and class notice; review Alsup prelim approval cases ; conf. call Team re same; conf. call WF counsel re class list--Hernandez and other service transfers; emails re same; review L. Lam research re same	3.5	\$800	\$ 2,800.00
2020-04-14	LPL	Work with M. Schrag to prepare for preliminary approval hearing, including by preparing notes on class representatives and analyzing citations to cases cited in prelim approval brief	1.7	\$465	\$ 790.50
2020-04-14	MLS	Prep for prelim approval hearing: review Gaudin, Chao and Wigod cases; review ND Guidelines and J. Alsup standing order re evaluation class settlement; review my declaration; email damages expert; conf. call w WF counsel re class list (Alicia and other service transfers); emails Team re same;	3.7	\$800	\$ 2,960.00
2020-04-14	LCF	Continue to prepare for hearing on Plaintiffs' Motion for Preliminary Approval, including finish analysis of similar cases and draft chart to outline differences, finish draft summary of allocation plan talking points, and draft chart outlining dates in proposed Order compared to settlement agreement	6.8	\$425	\$ 2,890.00
2020-04-15	LPL	E-mails with M. Schrag and team re: pulling information/cites for hearing on motion for preliminary approval	0.4	\$465	\$ 186.00
2020-04-15	JJB	Call with co-counsel and defense counsel re class list and preliminary approval hearing	0.6	\$580	\$ 348.00
2020-04-15	LPL	Conf. call with M. Schrag, co-counsel, and defense counsel re: final list of borrowers in the class and preliminary approval hearing tomorrow	0.6	\$465	\$ 279.00
2020-04-15	JJB	Call with team re preparing for hearing on motion for preliminary approval	1.3	\$580	\$ 754.00

2020-04-15	LPL	Conf. call with team re: preparing for hearing on motion for preliminary approval	1.3	\$465	\$ 604.50
2020-04-15	RMP	Prepare for preliminary approval hearing; work on open questions re: class list and allocation plan	3.9	\$725	\$ 2,827.50
2020-04-15	LCF	Continue to prepare for hearing on Plaintiffs' Motion for Preliminary Approval, including finish draft chart outlining dates in proposed Order compared to settlement agreement and outline talking points regarding timing proposed; continue to analyze question regarding "Service Transfer" non-class members and correspond with Wells Fargo to confirm properly excluded from the class	4.5	\$425	\$ 1,912.50
2020-04-15	MLS	Prep for preliminary approval hearing--draft argument outline/review cases, declarations and brief; Moot argument w/ A. Mura, L. Lam, R. Paul, L. Fellows and J. Bloomfield; emails D. Salah re damages explanations, tel. call R. Paul re allocation; tel. call WF counsel re class list re service transfers; review Todd and Smith foreclosure documents;	5.5	\$800	\$ 4,400.00
2020-04-16	LPL	E-mails with co-counsel re: revised class notice and final approval schedule to file with the court	0.3	\$465	\$ 139.50
2020-04-16	LCF	Appear on behalf of Plaintiffs at hearing on Plaintiffs' Motion for Preliminary Settlement Approval	0.8	\$425	\$ 340.00
2020-04-16	LPL	Attend telephonic hearing on preliminary approval	0.9	\$465	\$ 418.50
2020-04-16	RMP	Prepare for and participate in preliminary approval hearing	1.6	\$725	\$ 1,160.00
2020-04-16	MLS	prep for hearing: review outline and tel. call R. Paul re allocation; Telephonic Preliminary Approval Hearing; tel. call E. Gibbs re hearing; review amendments to notice and allocation plan; emails WF counsel re same	1.8	\$800	\$ 1,440.00

2020-04-16	LCF	Finalize preparations for hearing on Motion for Preliminary Settlement Approval, including update allocation chart to remove non-class members and add updated settlement payments, and finalize outline of talking points regarding timing of settlement and notice plan	1.9	\$425	\$ 807.50
2020-04-16	LCF	Begin to revise proposed settlement documents pursuant to Judge Alsup's direction at hearing on Motion for Preliminary Settlement Approval, including revise draft of Proposed Order to include "actual dates," revise Notice, revise Emotional Distress Claim Form, and revise Allocation Plan; analyze Settlement Agreement and proposed timing revisions to agreement; finalize proposed revisions and send to Wells Fargo for review and confirm no additional edits	3.8	\$425	\$ 1,615.00
2020-04-17	RMP	Correspondence with opposing counsel re: dates and submitting updated class notice and proposed schedule of deadlines	0.4	\$725	\$ 290.00
2020-04-17	MLS	tel. calls and emails w/ Team and WF counsel re filing amended notice, allocation plan, emotional distress claim form and proposed order; review edit same documents	1.7	\$800	\$ 1,360.00

2020-04-17	LCF	Finalize proposed settlement documents pursuant to Judge Alsup's direction at hearing on Motion for Preliminary Settlement Approval, including finalize revised draft of Proposed Order, Notice, Emotional Distress Claim Form, and Allocation Plan; review and incorporate further updates from Wells Fargo's counsel, including contact information for settlement administrator; review and revise draft Notice of Supplemental Documents to be filed with updated pleadings; review and confirm final documents ready to be filed	2.8	\$425	\$ 1,190.00
2020-04-17	LPL	Edit, finalize, and file notice of amended proposed order, class notice, allocation plan, and severe emotional distress claim form; calls and e-mails with M. Schrag and L. Fellows re: same	3.6	\$465	\$ 1,674.00
2020-04-20	LPL	E-mails with defense counsel and co-counsel re: updated CIT chart with information on each class member	0.1	\$465	\$ 46.50
2020-04-20	RMP	Review preliminary approval order and timeline of events	0.2	\$725	\$ 145.00
2020-04-20	LPL	Conf. call with M. Schrag and co-counsel re: plan for working with JND to mail out class notice and next steps for non-class member clients	0.6	\$465	\$ 279.00
2020-04-21	LPL	E-mail with defense counsel re: sending final version of class notice and emotional distress claim form to JND	0.1	\$465	\$ 46.50
2020-04-22	LPL	E-mails with settlement administrator re: timeline for the remainder of approval process	0.2	\$465	\$ 93.00
2020-04-24	MLS	conf. call WF counsel re class website and final class list, review Yanni retention and pleading	0.5	\$800	\$ 400.00
2020-04-24	LPL	Prepare notice of and file Cathy Yanni's retention agreement per Court's order in preliminary approval motion	0.6	\$465	\$ 279.00

2020-04-30	LPL	Review 9th Cir. staying appellate proceedings pending settlement approval; e-mail to legal secretary about calendaring end of stay	0.1	\$465	\$ 46.50
2020-05-05	LPL	E-mail to defense counsel re: recent change of addresses for several class members to send to settlement administrator	0.3	\$465	\$ 139.50
2020-05-11	LPL	Conf. call with M. Schrag, co-counsel, and settlement administrator re: logistics of mailing out notice	0.2	\$465	\$ 93.00
2020-05-12	LPL	Call with co-counsel L. Fellows re: plan for reviewing class notice proofs from JND	0.2	\$465	\$ 93.00
2020-05-13	LPL	E-mails with co-counsel re: obtaining samples of notices for review before JND mails out any notices	0.3	\$465	\$ 139.50
2020-05-14	LPL	Review and analyze sample class notice created by JND; e-mails with team re: proposed edits to the same	0.8	\$465	\$ 372.00
2020-05-15	MLS	review emails re class notice; tel. call L. Lam re same	0.3	\$800	\$ 240.00
2020-05-15	LPL	Work on reviewing class notice mailings so that each includes correct allocation amounts; e-mails with co-counsel L. Fellows and settlement administrator re: same	5.8	\$465	\$ 2,697.00
2020-05-18	LPL	E-mails with class member Leonel Tirado re: process for applying for the severe emotional distress fund	0.2	\$465	\$ 93.00
2020-05-18	LPL	Call with class member Heriberto Rivera on his change of address; e-mail to JND re: same	0.3	\$465	\$ 139.50
		Project Total:	390.3		\$ 220,240.50
Project: Calls with class members about the settlement					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-03-12	LCF	Analyze question regarding whether Mr. Brown is a class member, including research CIT chart and other information to determine the same	0.2	\$425	\$ 85.00
2020-04-01	JJB	Calls with named plaintiffs re preliminary approval motion and settlement terms	1.3	\$580	\$ 754.00

2020-04-01	LCF	Correspond with Ms. Wilson and Ms. Floyd regarding settlement amounts and next steps, including outline notes and talking points in advance of the same, as well as confirm correct numbers regarding settlement allocations	2	\$425	\$ 850.00
2020-04-02	LPL	Call with class member Brent Zollman to explain the terms of the settlement with him, how much he would be getting, and answering his questions about the settlement	0.6	\$465	\$ 279.00
2020-04-02	RMP	Work on communication plan to class members who are clients	0.9	\$725	\$ 652.50
2020-04-02	LPL	Conf. call with team re: approaching calls with clients and explaining the benefits of the settlement to them; next steps for clients who are not class members	1.2	\$465	\$ 558.00
2020-04-02	MLS	Tel. calls and emails re class list and communication to class members; review edit communication; conf. call WF counsel re class list	1.5	\$800	\$ 1,200.00
2020-04-02	JJB	Calls to client class members re settlement	2.1	\$580	\$ 1,218.00
2020-04-02	LPL	Work with co-counsel L. Fellows in checking to see that each client who is a class member receives the e-mail update about the settlement; compare spreadsheets of class members & clients	4.4	\$465	\$ 2,046.00
2020-04-03	LPL	Call with M. Schrag and client Alicia Hernandez re: update on the case, the settlement, and what's next for her case	0.4	\$465	\$ 186.00
2020-04-03	JJB	Calls to client class members re settlement	2.6	\$580	\$ 1,508.00

2020-04-03	MLS	Tel. calls R. Paul, L. Lam and J. Bloomfield re client analysis and communication plan; review and analyze spreadsheets and review and draft emails re same; discuss plans for contacting class members, impacted non-class members, and non-impacted clients; tel. call A. Hernandez re next steps for her case;	2.7	\$800	\$ 2,160.00
2020-04-06	LPL	Conf. call with M. Schrag, J. Bloomfield and co-counsel re: plan for calling each client we have who is a class member, and for next steps with non-class member clients	0.5	\$465	\$ 232.50
2020-04-06	JJB	Calls to client class members re settlement	3.7	\$580	\$ 2,146.00
2020-04-06	LPL	Calls with clients/class members Richard Shipley, Michelle Catalano, Mary Anderson, and Cathaline Gonzalez to explain the settlement to them; attempted calls to other class members and log each communication	3.9	\$465	\$ 1,813.50
2020-04-06	LCF	Correspond with class member clients regarding settlement process generally and their proposed settlement allocations; draft summary of calls	6.9	\$425	\$ 2,932.50
2020-04-07	LPL	E-mails with class members Keith Rodall and James Hanna re: touching base with them regarding the proposed settlement	0.2	\$465	\$ 93.00
2020-04-07	MLS	Tel. calls w/ class member clients to explain settlement; emails re same; tel. calls w/ non-impacted borrowers and draft disengagement letters; tel. call A. Zeman and L. Lam re same; review A. Hernandez documents to determine whether WF or new servicer foreclosed on her home; discuss w/ R. Paul and L. Lam	3.3	\$800	\$ 2,640.00
2020-04-07	JJB	Calls to client class members re settlement	3.5	\$580	\$ 2,030.00

2020-04-07	LPL	Calls with class members Charles Gomez, James Hanna, Jennifer Fouchie, and Tambra Hill to explain the settlement to them, the approval process, and answer questions they have; e-mails with team about those calls	3.7	\$465	\$ 1,720.50
2020-04-07	LCF	Continue to correspond with class member clients regarding settlement process generally and their proposed settlement allocations; draft summary of calls	5.7	\$425	\$ 2,422.50
2020-04-08	LCF	Continue to correspond with clients regarding proposed settlement, including follow-up call with Mr. Ayala	0.2	\$425	\$ 85.00
2020-04-08	LPL	E-mails with team re: how calls with class members to discuss the settlement are going	0.4	\$465	\$ 186.00
2020-04-08	LPL	Conf. call with team re: calls to clients who are class members, Alicia Hernandez situation, and disengaging with clients who were not impacted by the error	1.1	\$465	\$ 511.50
2020-04-08	MLS	Conf. call Team re progress of class member calls and calls/letters to disengage from non-impacted borrowers; review emails re same; conf. call WF counsel re potential errors in remediation amounts and service transfer borrowers; also discussed litigation deadlines. emails L. Lam re class member responses to allocation plan	2.3	\$800	\$ 1,840.00
2020-04-08	JJB	Calls to client class members re settlement	4.4	\$580	\$ 2,552.00
2020-04-08	LPL	Calls with class members Marisol Martinez, Janet Jenkins, Lisa Cobren, Deborah Colon, Mark Gomez, Charlene Harris-Waters, and Keith Rodall re: the terms of the settlement, what it means for them, and the settlement approval process; log notes on each call	5.2	\$465	\$ 2,418.00

2020-04-09	LCF	Continue to correspond with Mr. Brown regarding settlement allocation and next steps, including draft and save summary of correspondence for the file	0.2	\$425	\$ 85.00
2020-04-09	LPL	Calls to class members Belinda Taggart-Huff, David Starkey, and Craig Enis re: the settlement terms and what it would mean for them; log all calls on Salesforce	1.4	\$465	\$ 651.00
2020-04-09	MLS	Conf. call and email Team re discussion w/ class members; review/edit communication to non-foreclosed clients; discussions and emails re class list including re A. Hernandez and D. Robinson; review/edit communication to non-foreclosed clients	2	\$800	\$ 1,600.00
2020-04-09	JJB	Calls to client class members re settlement	5.2	\$580	\$ 3,016.00
2020-04-10	LPL	Call to class member Calvin Simmons to discuss the proposed settlement	0.4	\$465	\$ 186.00
2020-04-10	LPL	Call with class member Craig Enis to explain the settlement to him and what it means for him	0.5	\$465	\$ 232.50
2020-04-10	LCF	Continue to correspond with class member clients regarding settlement process generally and their proposed settlement allocations; confirm clients agree to proposed allocation; draft summary of calls for the file	2	\$425	\$ 850.00
2020-04-13	LPL	Calls with class members Christopher Booth and Colleen Marchese re: explaining the settlement and what it means specifically for them	0.9	\$465	\$ 418.50
2020-04-13	JJB	Calls to client class members re settlement	3.9	\$580	\$ 2,262.00
2020-04-14	LCF	Follow-up correspondence with Mr. King regarding settlement allocation, including draft notes regarding call	0.1	\$425	\$ 42.50
2020-04-14	LPL	Calls with class members Calvin Simmons and Chris Booth to answer their questions regarding the proposed settlement	0.6	\$465	\$ 279.00

2020-04-14	JJB	Calls to client class members re settlement	2.6	\$580	\$ 1,508.00
2020-04-15	LCF	Continue to correspond with class member clients regarding settlement process generally and their proposed settlement allocations, including further attempts to contact clients with whom initially unable to speak; draft summary of calls	1	\$425	\$ 425.00
2020-04-15	JJB	Calls to client class members re settlement	2.2	\$580	\$ 1,276.00
2020-04-16	LCF	Correspond with class member client, Mr. Schulke, regarding his proposed settlement allocation	0.2	\$425	\$ 85.00
2020-04-16	JJB	Calls to client class members re settlement	1.8	\$580	\$ 1,044.00
2020-04-17	JJB	Calls to client class members re settlement	2.3	\$580	\$ 1,334.00
2020-04-20	JJB	Calls to client class members re settlement	3.8	\$580	\$ 2,204.00
2020-04-21	JJB	Calls to client class members re settlement	3.4	\$580	\$ 1,972.00
2020-04-23	LPL	E-mail to co-counsel re: class member Christopher Booth and the possibility of him mediating with Wells Fargo during the settlement approval process	0.1	\$465	\$ 46.50
2020-04-23	LPL	Call with class member Mary Anderson to answer her questions about the settlement approval schedule	0.4	\$465	\$ 186.00
2020-04-24	LPL	Call with class member Joomi Lim to update her on the settlement, what she'd be getting under the settlement, and the approval process; e-mail to team re: same	0.7	\$465	\$ 325.50
2020-04-28	LPL	Call with M. Schrag and e-mails with team re: call with Alicia Hernandez and following up with her later in the week about her concerns	1.2	\$465	\$ 558.00
2020-04-28	LPL	Call with Alicia Hernandez re: including her in the class, the settlement, the approval process, and her concerns	1.6	\$465	\$ 744.00

2020-04-30	LPL	Call with co-counsel L. Fellows re: reaching out to class member Alicia Hernandez to talk to her about the settlement	0.5	\$465	\$ 232.50
2020-04-30	LPL	Call with Alicia Hernandez and M. Schrag to answer further questions and provide her with more details about the settlement and its value given the strengths/weaknesses of the case	0.8	\$465	\$ 372.00
2020-05-01	LPL	E-mails with class member Brent Zollman re: update on the settlement approval process	0.2	\$465	\$ 93.00
2020-05-01	LPL	Call with class member Darin Windsor to answer his questions about the approval process and Wells possibly correcting his credit report; e-mail to J. Bloomfield re: same	0.6	\$465	\$ 279.00
2020-05-01	LPL	E-mails with J. Bloomfield re: responding to class members who are calling us to find out about the case; return some calls to WF MortMod line	0.6	\$465	\$ 279.00
2020-05-04	LPL	E-mails with class member Keith Rodall re: status of settlement approval process	0.2	\$465	\$ 93.00
2020-05-04	LPL	E-mails with co-counsel L. Fellows re: updating clients/class members on preliminary approval order and mailing out notice	0.2	\$465	\$ 93.00
2020-05-06	MLS	Review/edit email blast re preliminary approval; tel. call L. Lam re same; emails defense counsel and team re class list changes	0.2	\$800	\$ 160.00
2020-05-06	LPL	E-mails with co-counsel and defense counsel re: communicating with certain borrowers who have been added to the class list about releases they signed that WF will not enforce	0.3	\$465	\$ 139.50
2020-05-06	LPL	Call with client John Chambers to update him on the case, the proposed settlement, and possible next steps for non-foreclosure affected borrowers	0.3	\$465	\$ 139.50

2020-05-06	LPL	Draft update e-mail blast to class member clients to update them on the settlement approval process and notice going out in the mail; confer with M. Schrag re: same	0.5	\$465	\$ 232.50
2020-05-07	LPL	E-mails with co-counsel re: letter to be sent out to certain borrowers who are newly added class members	0.3	\$465	\$ 139.50
2020-05-08	LPL	E-mails with team re: getting information on allocation amount for a class member to his counsel (James Vlahakis)	0.2	\$465	\$ 93.00
2020-05-08	LPL	E-mails with affected borrower Pamela Gassaway on the status of the case and whether she is included in the settlement	0.3	\$465	\$ 139.50
2020-05-08	LPL	E-mails with team re: sending letters to borrowers who previously signed releases, but can now be a part of the settlement class	0.3	\$465	\$ 139.50
2020-05-08	LPL	Confer with U. Chavez re: client responses to e-mail update sent yesterday on the status of settlement approval; review client responses to update	0.4	\$465	\$ 186.00
2020-05-13	LPL	Call with class member Christopher Booth to update him on the status of the settlement approval process; e-mail to team re: same	0.4	\$465	\$ 186.00
2020-05-15	LPL	Call with class member Megan Hall/Arrington re: the settlement, her allocation, and the approval process	0.7	\$465	\$ 325.50
2020-05-21	LPL	Call with class members Steve Schmeltzer and Calvin Simmons re: their questions about the notice and final approval hearing	0.5	\$465	\$ 232.50
2020-05-25	LPL	Call with class member Charles Gomez on his questions about the settlement allocation	0.2	\$465	\$ 93.00
2020-05-27	JJB	Call with class member J. Plescia	0.2	\$580	\$ 116.00
2020-05-27	JJB	Call with M. Schrag re J. Plescia settlement allocation	0.2	\$580	\$ 116.00

2020-05-27	LCF	Call with class member, Sean Daily, regarding settlement allocation and next steps, including draft summary of call	0.3	\$425	\$ 127.50
2020-05-27	LPL	Calls with M. Schrag to class members Alicia Hernandez and Janet Jenkins to answer questions about the settlement and the notice	0.5	\$465	\$ 232.50
2020-05-27	JJB	Research re J. Plescia settlement allocation	0.6	\$580	\$ 348.00
2020-05-28	LPL	Call with M. Schrag and class member Charles Gomez on questions he had about the settlement	0.5	\$465	\$ 232.50
2020-05-28	LPL	Conf. call with team re: questions/issues raised by class members about the settlement	0.7	\$465	\$ 325.50
		Project Total:	114.1		\$ 61,595.50
Project: Motion for final approval and attorney's fees and costs					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-03-12	LPL	E-mails and research re: how to present attorney's fees/lodestar per Judge Alsup's guidelines from LendingClub case	0.4	\$465	\$ 186.00
2020-03-12	LPL	Research re: how to best present lodestar/time spent on the case to the Court at the final approval stage	0.8	\$465	\$ 372.00
2020-03-19	AGS	Begin review of time entries for multiple attorneys attending court hearings and depositions, spelling, cuts for purposes of removing entries related to individual claims that were settled through mediation process with Paul LLP as counsel in those mediations, entries related to the first motion for class certification, entries related to Mr. Fitzpatrick, inter-office communications and meetings	1.7	\$575	\$ 977.50
2020-03-20	AGS	Continue review and revision of time entries	5.4	\$575	\$ 3,105.00
2020-03-21	AGS	Continue review and revision of time entries to remove duplication and conform entries to Judge Alsup's preferred formatting	4.9	\$575	\$ 2,817.50

2020-03-22	AGS	Continue editing time entries for consistencies, removing time that is administrative in nature or otherwise determined to not submit for the Court's consideration	2.3	\$575	\$ 1,322.50
2020-03-31	AGS	Continue work on time entries in preparation for preliminary approval submission	0.2	\$575	\$ 115.00
2020-04-02	AGS	Work on time entries in preparation for preliminary approval submission	0.2	\$575	\$ 115.00
2020-04-17	AGS	Continue analysis of time entries for submission to Court	0.9	\$575	\$ 517.50
2020-04-20	MLS	Conf. call team re class list, fee application tasks, and Notice issues	0.5	\$800	\$ 400.00
2020-04-21	MLS	Review Alsup cases re categorization of attorney time; tel. calls and emails L. Lam re same; emails re class list	0.8	\$800	\$ 640.00
2020-04-21	LPL	Legal research re: Judge Alsup's standards for reviewing motions for fees and expenses at final approval; e-mail to M. Schrag re: same	3.6	\$465	\$ 1,674.00
2020-04-22	MLS	Conf. call A. Mura and L. Lam re organizing lodestar presentation;	0.2	\$800	\$ 160.00
2020-04-22	LPL	Call with M. Schrag and A. Mura re: how to present timekeeping/hours billed with final approval motion	0.2	\$465	\$ 93.00
2020-04-22	LCF	Work on Motion for Final Approval and Attorneys' Fees, including assist with locating relevant cases and opinions from Judge Alsup regarding his preferred presentation and organization of attorney time records in support of fee application; outline preliminary thoughts regarding preparing fee records	1.2	\$425	\$ 510.00
2020-04-22	LPL	Further legal research on Alsup final approval orders and preferences for counsel to submit detailed billing with fee motions; e-mails with co-counsel L. Fellows re: same	2.8	\$465	\$ 1,302.00

2020-04-23	LPL	Draft proposed plan for organizing timekeeping by discrete project for presentation with final approval motion; e-mail to co-counsel L. Fellows re: same	0.9	\$465	\$ 418.50
2020-04-27	LPL	E-mail to team re: plan for organizing class counsel time to present in motion for attorney's fees and costs	0.3	\$465	\$ 139.50
2020-04-28	LPL	Work on creating list of discrete projects for organizing/presenting time in motion for attorney's fees and costs	3.7	\$465	\$ 1,720.50
2020-04-29	MLS	Emails re fee application tasks; review L. Lam list of projects; review declarations in other Alsup fee applications	0.6	\$800	\$ 480.00
2020-04-29	LPL	Work on creating list of discrete projects to organize time for presentation with motion for attorney's fees and costs; e-mails with team re: same	4.9	\$465	\$ 2,278.50
2020-04-30	JJB	Team call re plan for organizing time to present at final approval	0.7	\$580	\$ 406.00
2020-04-30	LPL	Conf. call with team re: plan for organizing time to present at final approval	0.7	\$465	\$ 325.50
2020-04-30	MLS	Conf. call A. Hernandez and L. Lam re settlement; review allocation plan and email D. Salah re same; conf call team re organizing projects for fee application; review/edit L. Lam project list,	1.2	\$800	\$ 960.00
2020-05-01	MLS	Emails D. Salah and Team re allocation plan audit and settlement webiste	0.2	\$800	\$ 160.00
2020-05-01	LPL	E-mails and confer with team re: organizing and categorizing time/lodestar for presentation at final approval	0.4	\$465	\$ 186.00
2020-05-01	JJB	Organize time/lodestar for presentation at final approval	2.6	\$580	\$ 1,508.00
2020-05-05	JJB	Team call re presenting lodestar in final approval motion/fee application	0.6	\$580	\$ 348.00

2020-05-05	LPL	Conf. call with team re: presenting lodestar in final approval motion/fee application	0.6	\$465	\$ 279.00
2020-05-05	MLS	Conf. call Team re addition to class list, fee app. strategy and plan; email to class members	0.7	\$800	\$ 560.00
2020-05-05	JJB	Organize time/lodestar for presentation at final approval	2.2	\$580	\$ 1,276.00
2020-05-06	LPL	Calls and e-mails with M. Schrag and A. Zeman re: organizing/presenting lodestar at final approval	0.6	\$465	\$ 279.00
2020-05-06	MLS	Review, edit time records	1.5	\$800	\$ 1,200.00
2020-05-08	LPL	E-mails with J. Bloomfield re: organizing lodestar for fee application	0.2	\$465	\$ 93.00
2020-05-08	JJB	Organize time/lodestar for presentation at final approval	3.1	\$580	\$ 1,798.00
2020-05-11	JJB	Organize time/lodestar for presentation at final approval	2.3	\$580	\$ 1,334.00
2020-05-11	LPL	Begin researching for/outlining motion for final approval and for fees/costs	3.3	\$465	\$ 1,534.50
2020-05-12	MLS	Review/edit outline for final approval and fee brief; audit time records to organize by project	0.8	\$800	\$ 640.00
2020-05-12	LCF	Continue to analyze fee records and divide them out by specific task as directed by Judge Alsup in prior matters in connection with Motion for Final Approval	2.2	\$425	\$ 935.00
2020-05-12	LPL	Outlining/research for motion for final approval and fee application	4.2	\$465	\$ 1,953.00
2020-05-13	MLS	Audit time records; emails L. Lam re CA or federal standard for fee app	1.2	\$800	\$ 960.00
2020-05-13	JJB	Organize time/lodestar for presentation at final approval	3.8	\$580	\$ 2,204.00
2020-05-13	LCF	Continue to analyze fee records and divide them out by specific task as directed by Judge Alsup in prior matters in connection with Motion for Final Approval	4	\$425	\$ 1,700.00
2020-05-13	LPL	Draft motion for final approval; e-mails with M. Schrag re: same	4.9	\$465	\$ 2,278.50

2020-05-14	LCF	Continue to analyze fee records and divide them out by specific task as directed by Judge Alsup in prior matters in connection with Motion for Final Approval	1	\$425	\$ 425.00
2020-05-14	MLS	Audit time records; email re class notice	1.3	\$800	\$ 1,040.00
2020-05-14	LPL	Continue drafting Plaintiffs' motion for final approval of settlement; legal research for the same	5.4	\$465	\$ 2,511.00
2020-05-15	LPL	Continue drafting motion for final approval of proposed class settlement	1.4	\$465	\$ 651.00
2020-05-15	JJB	Organize time/lodestar for presentation at final approval	2.5	\$580	\$ 1,450.00
2020-05-16	MLS	Final Approval/Fee application--audit time records	1.3	\$800	\$ 1,040.00
2020-05-18	LPL	Continue drafting Plaintiffs' motion for final approval of proposed class settlement	4.7	\$465	\$ 2,185.50
2020-05-19	LCF	Continue to analyze fee records and divide them out by specific task as directed by Judge Alsup in prior matters in connection with Motion for Final Approval	1.4	\$425	\$ 595.00
2020-05-19	MLS	Audit time records	1.5	\$800	\$ 1,200.00
2020-05-19	LPL	Continue drafting Plaintiffs' motion for final approval of proposed class action settlement	5.4	\$465	\$ 2,511.00
2020-05-20	RMP	Research recent opinion on fee awards	0.2	\$725	\$ 145.00
2020-05-20	MLS	Audit time records	0.3	\$800	\$ 240.00
2020-05-20	LPL	Continue drafting/editing Plaintiffs' motion for final approval of proposed class settlement	4.7	\$465	\$ 2,185.50
2020-05-21	MLS	Emails re fed vs. state law in fee app; tel. call L. Lam re same	0.3	\$800	\$ 240.00
2020-05-21	LCF	Continue to analyze fee records and divide them out by specific task as directed by Judge Alsup in prior matters in connection with Motion for Final Approval	1.5	\$425	\$ 637.50
2020-05-21	LPL	Begin drafting Plaintiffs' motion for attorney's fees and cost reimbursements; legal research for the same	3.6	\$465	\$ 1,674.00

2020-05-22	LPL	Draft Plaintiffs' motion for attorney's fees and cost reimbursements	2.9	\$465	\$ 1,348.50
2020-05-24	LPL	Review and incorporate M. Schrag's edits/comments to final approval brief	0.7	\$465	\$ 325.50
2020-05-25	LPL	Review M. Schrag's edits to final approval brief; add more edits and e-mail to M. Schrag re: same	0.5	\$465	\$ 232.50
2020-05-26	LPL	Continue drafting motion for attorney's fees and costs	0.9	\$465	\$ 418.50
2020-05-27	LPL	E-mails with team and defense counsel re: proposed answer to a new FAQ for the settlement website	0.3	\$465	\$ 139.50
2020-05-27	LPL	Continue drafting Plaintiffs' motion for attorney's fees and costs	2.9	\$465	\$ 1,348.50
2020-05-28	LPL	Draft motion for attorney's fees and costs	4.2	\$465	\$ 1,953.00
2020-05-29	LPL	E-mails and call with co-counsel L. Fellows re: categorizing time by project to submit with fee application	0.4	\$465	\$ 186.00
2020-05-29	LPL	Continue drafting motion for attorney's fees and costs; e-mail to M. Schrag re: same	3.6	\$465	\$ 1,674.00
		Project Total:	131.4		\$ 68,618.00

Project: ESI protocol/protective order

Date	Timekeeper	Description	Hours x Rate = Fee		
2019-03-10	AGS	Review Case Management Conference statement; reach out to opposing counsel regarding Electronically Stored Information protocols	0.2	\$575	\$ 115.00
2019-03-11	AGS	Prepare for and attend Rule 26 conference with defense counsel; communications with Electronically Stored Information liaison for Wells Fargo regarding Electronically Stored Information protocols	1.2	\$575	\$ 690.00
2019-03-13	AGS	Electronically Stored Information meet and confer with Wells Fargo's counsel	0.4	\$575	\$ 230.00
2019-03-15	AGS	Prepare for case management conference; communication to opposing counsel regarding Electronically Stored Information protocol and protective order	0.3	\$575	\$ 172.50

2019-04-15	AGS	Cursory review of Wells Fargo's proposed Electronically Stored Information Protocol and Protective Order; pull down Northern District of California recommended Stipulated Electronically Stored Information Protocol and Protective Order for comparison	0.3	\$575	\$ 172.50
2019-04-17	AGS	Review and edit Wells Fargo's proposed Electronically Stored Information Protocol and Protective Order	1	\$575	\$ 575.00
2019-04-23	AGS	Communications with L. Campoli regarding protective order; finalize and file protective order	0.3	\$575	\$ 172.50
2019-04-29	AGS	Review Protective Order	0.2	\$575	\$ 115.00
2019-05-22	AGS	Draft proposed Electronically Stored Information Protocol; communicate with team regarding same	0.8	\$575	\$ 460.00
2019-05-30	AGS	Review communication from opposing counsel regarding Electronically Stored Information protocol	0.1	\$575	\$ 57.50
2019-06-09	AGS	Send another email to L. Campoli regarding Electronically Stored Information protocol requesting any edits to our proposed draft	0.1	\$575	\$ 57.50
2019-06-12	AGS	Work on discovery plan; communication with L. Campoli requesting Wells Fargo's response to the Electronically Stored Information Protocol; read communication regarding Custodians and positions held with Bank versus Company	0.8	\$575	\$ 460.00
2019-06-16	AGS	Send another email to L. Campoli regarding Electronically Stored Information protocol requesting any edits to our proposed draft	0.1	\$575	\$ 57.50
2019-07-08	AGS	Work on discovery meet and confer letter to Shawn Obi regarding Electronically Stored Information protocol	1.5	\$575	\$ 862.50

2019-07-12	LCF	Assist with Electronically Stored Information questions and outstanding issues to address with Wells Fargo, including outline and analyze thoughts regarding the same and circulate thoughts for further review and feedback	0.2	\$425	\$ 85.00
2019-07-15	LCF	Review, analyze, and provide feedback regarding Ms. Schwarz's letter to Wells Fargo outlining concerns with electronic discovery production	0.5	\$425	\$ 212.50
2019-07-15	AGS	Finalize letter regarding Electronically Stored Information search terms and date parameters; send to opposing counsel	1.1	\$575	\$ 632.50
2019-09-16	AGS	Draft response to Gretchen Scavo on outstanding Electronically Stored Information discovery issues and send	0.4	\$575	\$ 230.00
2019-10-24	LCF	Continue to work on various Electronically Stored Information issues, including draft proposed follow-up email for Ms. Schwarz to send to Ms. Scavo regarding email custodians and document retention timelines	0.6	\$425	\$ 255.00
2019-10-25	AGS	Draft and send response to defense counsel regarding outstanding Electronically Stored Information issues	0.2	\$575	\$ 115.00
2019-11-06	LCF	Review correspondence from Ms. Scavo regarding Electronically Stored Information and presence (or absence) of additional records	0.1	\$425	\$ 42.50
2020-02-26	LPL	Review and analyze WF's "attorney's eyes only" proposal/edits to protective order; e-mail to team re: same	0.3	\$465	\$ 139.50
2020-02-28	LCF	Outline and analyze thoughts regarding Wells Fargo's proposed protective order revisions to produce loan files and proposed follow-up email regarding protective order and format of document production, revise draft correspondence, and send to Wells Fargo's counsel	0.3	\$425	\$ 127.50

2020-03-03	LCF	Continue to work on Stipulated, Amended Protective Order regarding production of unredacted Personally Identifiable Information, including review revised protective order from Ms. Scavo and draft Motion for approval, outline and analyze thoughts regarding the same	0.2	\$425	\$ 85.00
		Project Total:	11.2		\$ 6,122.00
Project: Trial prep					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-11-26	RMP	Work on building out trial plan	1.2	\$725	\$ 870.00
2020-01-20	RMP	Review and designate Crawford deposition	0.8	\$725	\$ 580.00
2020-01-23	RMP	Prepare deposition designations of Beena Meenon	1	\$725	\$ 725.00
2020-01-25	RMP	Designate deposition testimony of Dan Pfiel	1.2	\$725	\$ 870.00
2020-01-26	RPN	Review and organize documents identified to be possible trial exhibits	3.5	\$230	\$ 805.00
2020-01-29	RMP	Designate deposition testimony of Kara Reimers	0.6	\$725	\$ 435.00
2020-02-07	RMP	Designate deposition testimony of Kara Reimers	0.7	\$725	\$ 507.50
2020-02-10	LCF	Draft chart to summarize remaining case deadlines through trial, including upcoming pretrial deadlines and send summary to the team, including analyze Judge Alsup's pre-trial scheduling order for civil cases and calculate relevant deadlines	0.8	\$425	\$ 340.00
2020-02-26	RMP	Work on witness and exhibit list for trial; analyze how to authenticate potential trial exhibits; build summary of key documents	1.7	\$725	\$ 1,232.50
2020-02-28	RPN	Draft Plaintiff's Trial Witness List	0.5	\$230	\$ 115.00
2020-02-28	RMP	Prepare for trial; prepare witness list; work on deposition designations; start preparing final pretrial order	1.3	\$725	\$ 942.50
2020-03-04	RPN	Draft joint pretrial conference statement	1.3	\$230	\$ 299.00
		Project Total:	14.6		\$ 7,721.50

Project: Trial prep-exhibit list					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-27	RMP	Prepare exhibit list; review hot documents	2	\$725	\$ 1,450.00
2020-01-09	RPN	Review and organize documents identified to be possible deposition or trial exhibits	0.4	\$230	\$ 92.00
2020-01-13	RMP	Review hot documents to create exhibit list	2	\$725	\$ 1,450.00
2020-01-14	RMP	Review hot documents to prepare for trial	1.4	\$725	\$ 1,015.00
2020-01-15	RPN	Review and organize documents identified to be possible deposition or trial exhibits	1.5	\$230	\$ 345.00
2020-01-16	RMP	Review hot documents; prepare exhibit list for trial; review and analyze case strategy in light of class certification hearing; review correspondence from Wells Fargo regarding settlement	2.1	\$725	\$ 1,522.50
2020-01-18	RPN	Review and organize documents identified to be possible deposition or trial exhibits	3.2	\$230	\$ 736.00
2020-01-20	RPN	Review and organize documents identified to be possible deposition or trial exhibits	2.2	\$230	\$ 506.00
2020-01-23	RMP	Prepare exhibit list	1.9	\$725	\$ 1,377.50
2020-01-27	RPN	Review and organize documents identified to be possible trial exhibits	2	\$230	\$ 460.00
2020-01-27	RMP	Review hot documents; prepare exhibit list and chronology of hot documents	2.8	\$725	\$ 2,030.00
2020-02-04	RPN	Review and organize documents identified to be possible trial exhibits	2.2	\$230	\$ 506.00
2020-02-05	RPN	Review and organize documents identified to be possible trial exhibits	0.8	\$230	\$ 184.00
2020-02-12	RMP	Review hot documents to prepare exhibit list for trial	2.5	\$725	\$ 1,812.50
2020-02-13	RMP	Prepare chronology of hot documents	2.2	\$725	\$ 1,595.00
2020-02-13	RPN	Review and organize documents identified to be possible trial exhibits	4.7	\$230	\$ 1,081.00
2020-02-21	RMP	Review newly-produced hot documents; prepare chronology and exhibit list for trial	1.5	\$725	\$ 1,087.50
2020-02-24	RPN	Review and organize documents identified to be possible trial exhibits	0.4	\$230	\$ 92.00

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2020-02-25	RMP	Review newly produced hot documents; update chronology and exhibit list for trial	2.5	\$725	\$ 1,812.50
2020-02-27	RPN	Review and organize documents identified to be possible trial exhibits	3.7	\$230	\$ 851.00
2020-02-28	RPN	Review and organize documents identified to be possible trial exhibits	0.7	\$230	\$ 161.00
2020-03-04	RPN	Review and organize documents identified to be possible trial exhibits	2	\$230	\$ 460.00
2020-03-05	RPN	Review and organize documents identified to be possible trial exhibits	0.9	\$230	\$ 207.00
2020-03-06	RPN	Review and organize documents identified to be possible trial exhibits	2	\$230	\$ 460.00
		Project Total:	47.6		\$ 21,293.50
Project: Trial prep-evidence admissibility					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-03	RMP	Prepare exhibit list; work on admissibility of exhibits	2.1	\$725	\$ 1,522.50
2019-12-04	NRL	Began researching evidence question regarding Housing and Urban Development mortgagee letters and possible admissibility at trial; began creating memorandum with analysis of case law and evidentiary statutes relevant to determining answer	3.1	\$275	\$ 852.50
2019-12-05	LCF	Research and analyze relevant case law and rules of evidence regarding admission of Wells Fargo's documents, including research FRE 403 and outline thoughts regarding research	1.6	\$425	\$ 680.00
2019-12-06	NRL	Continued researching evidentiary exceptions to documents created by deceased people before death	1.4	\$275	\$ 385.00
2019-12-16	NRL	Researched hearsay exceptions for deceased person who created or wrote document; began writing memorandum to explain position	0.9	\$275	\$ 247.50
		Project Total:	9.1		\$ 3,687.50

Project: Motion for permission to communicate with CA class members before depositions and clarification re absent class member discovery (Dec. 9, 2019 hearing)					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-12-02	MLS	Conf. call team re discovery/depo scheduling, expert reports; meet and confer defense counsel re same; tel. call R. Paul re follow up letter to court; outline letter	1.7	\$800	\$ 1,360.00
2019-12-03	MLS	Email def. counsel re communicating w/ class members and absent class member damages discovery	0.3	\$800	\$ 240.00
2019-12-03	LPL	Call with M. Schrag re: discovery letter brief on absent class member depositions and absent class member damages discovery	0.4	\$465	\$ 186.00
2019-12-03	RMP	Prepare letter to court and absent class members	0.4	\$725	\$ 290.00
2019-12-03	MLS	Work on letter to Court; conf. R. Paul and L. Lam re same	1.3	\$800	\$ 1,040.00
2019-12-03	LPL	Draft letter to absent CA class members regarding Wells Fargo's deposition and document subpoenas	1.6	\$465	\$ 744.00
2019-12-03	LPL	Edits to draft letter to Judge Alsup regarding communications with absent class members and seeking clarification on absent class members' discovery	1.8	\$465	\$ 837.00
2019-12-04	MLS	work on letter to court re discovery and depo issues; emails w/ def counsel re same	1.7	\$800	\$ 1,360.00
2019-12-04	LPL	Edit, finalize, and file letter to the Court regarding absent class member depositions, and damages discovery for absent class members	2.6	\$465	\$ 1,209.00
2019-12-05	MLS	Discuss discovery hearing w Eric Gibbs and L. Lam; tel call R. Paul re same	0.8	\$800	\$ 640.00
2019-12-06	LPL	Review and analyze Wells Fargo's response to discovery letter brief; confer with M. Schrag re: plan for meet and confer and hearing	0.6	\$465	\$ 279.00

2019-12-06	LCF	Assist with preparations for Monday's hearing on discovery issues, permission to send letter to class members before their depositions, and obtaining damages' discovery for California class members, including gathering relevant documents and information needed for Mr. Paul to use at hearing and meet and confer before hearing	0.7	\$425	\$ 297.50
2019-12-06	RMP	Prepare for depositions; prepare for meet and confer and hearing on discovery issue	1.4	\$725	\$ 1,015.00
2019-12-08	LPL	Prep for hearing on absent class member depositions and absent class member discovery	0.6	\$465	\$ 279.00
2019-12-09	LPL	Prep for hearing on absent class member depositions and discovery on absent class member damages	0.5	\$465	\$ 232.50
2019-12-09	MLS	Tel. calls R. Paul and L. Lam re hearing, damages analysis, and depo prep	0.8	\$800	\$ 640.00
2019-12-09	LPL	Finalize and send out letter to absent class members regarding possible representation during their depositions	0.9	\$465	\$ 418.50
2019-12-09	RMP	Prepare for and conduct meet-and-confer on discovery dispute; court hearing on discovery dispute; travel to San Francisco for court hearing and to Los Angeles for class member depositions; prepare for class member depositions; gather materials for Brian Kelley expert work	10.4	\$725	\$ 7,540.00
		Project Total:	28.5		\$ 18,607.50

Project: Settlement administration					
Date	Timekeeper	Description	Hours x Rate = Fee		
2020-04-20	LCF	Begin to update final allocation plan, including begin to re-run numbers; confirm most recent information from Wells Fargo has not been updated and correspond with Wells Fargo's counsel regarding need for updated information; analyze next steps and timing regarding settlement administration	1	\$425	\$ 425.00
2020-04-21	RMP	Correspondence with opposing counsel re: settlement administrator	0.1	\$725	\$ 72.50
2020-04-22	RMP	Phone call with Notice Administrator re: class notice, website, and other deadlines	0.2	\$725	\$ 145.00
2020-04-23	RMP	Review correspondence from settlement administrator JND re: settlement deadlines	0.1	\$725	\$ 72.50
2020-04-23	LPL	E-mails with Wells Fargo on proposed URL names for settlement website	0.2	\$465	\$ 93.00
2020-04-23	MLS	Emails re website names and Gianni retention agreement	0.2	\$800	\$ 160.00
2020-04-24	LCF	Continue to work on settlement allocation, including correspond with Wells Fargo's counsel regarding additional information needed to finalize allocation plan; analyze response to Wells Fargo's counsel regarding contacting class member, Mr. Booth, regarding mediation	0.3	\$425	\$ 127.50
2020-04-24	LPL	Conf. call with defense counsel and co-counsel re: logistics on URL name for settlement website and updated CIT chart with class members	0.4	\$465	\$ 186.00
2020-04-24	RMP	Review correspondence re: settlement website; phone call with opposing counsel re: settlement website and outstanding settlement issues	0.4	\$725	\$ 290.00
2020-04-27	KDJ	Compare allocation spreadsheets to determine changes made by Wells Fargo	0.1	\$250	\$ 25.00

2020-04-27	LCF	Review and confirm no changes to draft pleading confirming special master accepts her engagement per Judge Alsup's Order; continue to work on settlement plan of allocation, including review updated and final version of class member information from Ms. Brinson and correspond with her regarding information to be updated	1.1	\$425	\$ 467.50
2020-04-28	RMP	Review and analyze updated CIT chart and allocation to each class member	0.2	\$725	\$ 145.00
2020-04-28	MLS	tel. calls and emails L. Lam re discussion w/ A. Hernandez re settlement; emails re final class list and allocation	0.3	\$800	\$ 240.00
2020-04-28	LCF	Continue to finalize allocation plan, including analyze final CIT chart from Wells Fargo, confirm correct, and re-run allocation figures	1.5	\$425	\$ 637.50
2020-04-29	LPL	E-mails with co-counsel L. Fellows re: whether Wells Fargo can contact class member Christopher Booth about his request for mediation	0.1	\$465	\$ 46.50
2020-04-29	LPL	E-mails with defense counsel re: suggested URL name for settlement website and borrowers who were determined "not impacted"	0.2	\$465	\$ 93.00
2020-04-29	RMP	Correspondence with opposing counsel re: website and allocation plan; review summary of discussion with Ms. Hernandez	0.2	\$725	\$ 145.00
2020-04-30	LPL	E-mails with M. Schrag re: getting Dan Salah to double-check math on allocation plan and budget for assignment	0.3	\$465	\$ 139.50
2020-04-30	LPL	E-mails with team re: auditing final settlement allocation plan/numbers	0.4	\$465	\$ 186.00

2020-04-30	LCF	Finalize allocation plan, including confirm formulas appear to be correct and send final Excel spreadsheet to Wells Fargo's counsel; analyze motion for fee application and procedure to categorize time as directed by Judge Alsup in prior matters, including categories for various tasks; review and draft response to Wells Fargo's further questions regarding representation of recently added class member, Mr. Booth	1.2	\$425	\$ 510.00
2020-05-01	LPL	E-mails with team re: selecting a URL name for the settlement website	0.1	\$465	\$ 46.50
2020-05-01	LCF	Continue to finalize allocation, including send final allocation plan to damages expert, Mr. Salah, to review and confirm accuracy of calculations, review and analyze feedback from Mr. Salah and confirm no further changes needed, and send final allocation numbers to Wells Fargo	0.3	\$425	\$ 127.50
2020-05-05	LPL	E-mails with co-counsel and defense counsel re: an additional class member to add to the list	0.2	\$465	\$ 93.00
2020-05-05	LCF	Continue to finalize settlement and notice to class members, including analyze thoughts regarding preparing fee application and use of billing judgment, correspond with co-counsel regarding the same	0.6	\$425	\$ 255.00
2020-05-05	RMP	Review correspondence from opposing counsel regarding class list; review correspondence from settlement administrator regarding website; analyze potential issues regarding Keller Rohrback firm	0.6	\$725	\$ 435.00
2020-05-06	RPN	Review class member information to ensure accurate mailing of checks	0.1	\$230	\$ 23.00

2020-05-06	LCF	Further revise settlement allocation to include additional person, Ms. Stachewitz, confirm accuracy of revised calculations, and send updated settlement allocation to Wells Fargo; review and analyze correspondence from Wells Fargo regarding class members who signed releases without counsel and request to send further correspondence to them; analyze question regarding client, Mr. Chambers, and whether he is a class member, including outline thoughts regarding the same	0.7	\$425	\$ 297.50
2020-05-07	RMP	Work on letter to class members who had signed invalid releases of their claims; follow up on settlement administration issues	0.3	\$725	\$ 217.50
2020-05-07	LPL	Review and analyze test settlement website and emotional distress claim form; e-mails with settlement administrator	0.7	\$465	\$ 325.50
2020-05-08	RMP	Review proposed edits to settlement website	0.1	\$725	\$ 72.50
2020-05-08	LPL	Review and analyze Wells Fargo's proposed edits to FAQs for settlement website	0.3	\$465	\$ 139.50
2020-05-08	LPL	E-mails with team re: edits/changes to settlement website	0.4	\$465	\$ 186.00
2020-05-08	MLS	Test out settlement website; emails re edits to website texts	0.5	\$800	\$ 400.00
2020-05-08	LCF	Review proposed contents of the settlement website from settlement administrator JND, including compare content to court approved documents, analyze proposed claim form, outline proposed edits and send to Wells Fargo	3	\$425	\$ 1,275.00
2020-05-11	LPL	E-mails with co-counsel L. Fellows re: edits to settlement website and reviewing each notice before it gets mailed out	0.2	\$465	\$ 93.00

2020-05-11	LCF	Continue to work on proposed contents of the settlement website from settlement administrator JND, including review Wells Fargo's proposed edits to the frequently asked questions, compare to Notice, and confirm edits acceptable, draft and send edits to website to JND, including confirm Wells Fargo's agreement to website changes; correspond with JND regarding receipt of Notice proofs for review and confirm schedule to finalize and mail notice	0.8	\$425	\$ 340.00
2020-05-11	MLS	Conf. call w/ claims admn re website edits and class notice prep; emails Team re same tel. call w/ atty for class member Yanahan; tel. call. D Loesser re KR time	1.7	\$800	\$ 1,360.00
2020-05-14	LCF	Review sample envelope and Notices, including confirm amounts correct and class member information appears to be correct, compare Notices to Court approved documents, outline thoughts regarding slight formatting tweaks and send revisions to settlement administrator; review and confirm accuracy of revised Notices and envelopes and confirm with settlement administrator	1.6	\$425	\$ 680.00
2020-05-15	LCF	Review and confirm accuracy of settlement amounts and prior payments as well as general formatting for first 250 final Notices, outline changes noted, and confirm changes sent to settlement administrator; analyze Wells Fargo's apparent attempts to communicate with settlement administrator without copying plaintiffs' counsel and correspond with both settlement administrator and Wells Fargo to confirm plaintiffs' counsel will be copied on all future correspondence	2.3	\$425	\$ 977.50
2020-05-17	RMP	Review correspondence re: class notice	0.1	\$725	\$ 72.50

2020-05-21	RMP	Correspondence with co-counsel re settlement administration	0.1	\$725	\$ 72.50
2020-05-21	LPL	E-mails with co-counsel re: class member Dawn Kelly's recent request for mediation	0.3	\$465	\$ 139.50
2020-05-21	LPL	Conf. call with M. Schrag, J. Bloomfield, and co-counsel re: dealing with class member loans belonging to divorced couples and whether to mail out two notices to divorced spouses	0.5	\$465	\$ 232.50
2020-05-21	MLS	Emails and conf. call re specific class member situations	0.8	\$800	\$ 640.00
2020-05-21	LCF	Review question from Wells Fargo regarding ongoing mediation and communication with class member and outline thoughts regarding proposed response to the same; analyze next steps to obtain updates from settlement administrator JND and any other ongoing settlement management questions/issues, including forwarding class member inquiries to counsel, draft proposed response to JND regarding ongoing settlement management; work on ongoing settlement management and specific questions from Wells Fargo, as well as finalizing draft motion for final approval	1.2	\$425	\$ 510.00
2020-05-26	LPL	E-mails with team re: edits to FAQ response on recent inquiries from individuals on whether they are a part of the class	0.2	\$465	\$ 93.00
2020-05-26	LPL	Conf. call with M. Schrag, co-counsel, and defense counsel re: outstanding issues on settlement administration	0.6	\$465	\$ 279.00
2020-05-26	MLS	Review/edit final approval brief; conf. call WF counsel re class member issues re divorced co-borrowers and notice; emails re FAQ revisions to website; emails re class member inquiries re settlement amounts	1.7	\$800	\$ 1,360.00
2020-05-27	RMP	Correspondence re: settlement administration	0.1	\$725	\$ 72.50

2020-05-27	LPL	E-mails with co-counsel re: adding Dawn Kelly as a class member and recalculating the allocation plan	0.2	\$465	\$ 93.00
2020-05-28	LPL	E-mails with settlement administrator re: response to a common FAQ that's coming up from class members	0.1	\$465	\$ 46.50
		Project Total:	28.9		\$ 15,161.50
Project: Miscellaneous/Notice of Pendency of Other Actions					
Date	Timekeeper	Description	Hours x Rate = Fee		
2019-03-14	LCF	Assist with draft Notice of Other Actions, including discussed draft with Ms. Lam, forward pleadings from other cases, attempt to locate third discovery action in Ohio	0.2	\$425	\$ 85.00
2019-03-14	LPL	Draft notice of related cases pursuant to local rules	2.8	\$465	\$ 1,302.00
2019-03-18	LPL	Edits to notice of pendency of other actions; e-mail to team re: same	0.2	\$465	\$ 93.00
2019-03-25	MLS	Review/edit Notice of pendency of other actions	0.2	\$800	\$ 160.00
2019-03-25	LPL	Edits to notice of pendency of other actions; e-mail to team and co-counsel re: same	0.4	\$465	\$ 186.00
2019-03-26	RMP	Review notice of related cases for filing	0.1	\$725	\$ 72.50
2019-05-09	EHG	c/w Rick and Michael re potential resolution issues and approach, general status of litigation, magistrate meeting	0.7	\$910	\$ 637.00
2019-05-15	MLS	emails and phone calls re ind. client claims; conf. E. Gibbs and A. Mura re standing order and 23g issues	0.5	\$800	\$ 400.00
2019-05-15	EHG	c/w Andre and Michael re Spokane case, obligations under Judge Alsup's orders, negotiating with Amanda, related matters	0.6	\$910	\$ 546.00
2019-05-15	EHG	review Judge Alsup's writings again, develop resolution strategy	0.7	\$910	\$ 637.00
2019-05-15	EHG	review Judge Alsup's class settlement standing order, news articles re same, 9th circuit response, email GLG team re same	1.3	\$910	\$ 1,183.00
2019-05-16	EHG	continue developing resolution strategy, reduce to writing, share with MLS	0.8	\$910	\$ 728.00

2019-05-20	EHG	c/w MLS re settlement options, c/w broader team re status of case, review mtd	1.2	\$910	\$ 1,092.00
2019-05-21	EHG	c/w MLS re potential resolution	0.2	\$910	\$ 182.00
2019-05-22	EHG	review additional Judge Alsup document, c/w MLS re approach, group meeting re approach	1.3	\$910	\$ 1,183.00
2019-05-23	MLS	meeting def. counsel re class rep and client settlements; meeting E.Gibbs and R. Paul re same; emails re WFC MTD	2.5	\$800	\$ 2,000.00
2019-05-24	MLS	tel. calls mediator; emails E. Gibbs re same; emails Team re client communications; email R. Paul an E. Gibbs re same	0.8	\$800	\$ 640.00
2019-05-28	MLS	tel. calls and emails re mediators; review/ edit communication to clients	2.2	\$800	\$ 1,760.00
2019-06-10	MLS	emails re mediation	0.3	\$800	\$ 240.00
2019-06-13	MLS	research re mediation;	0.2	\$800	\$ 160.00
2019-06-19	MLS	tel. calls and emails re mediation; conf. e. Gibbs and R. Paul re same;	0.8	\$800	\$ 640.00
2019-06-24	EHG	c/w MLS re big picture status of litigation, strategies going forward; review emails re depositions	1.1	\$910	\$ 1,001.00
2019-07-08	LCF	Review Wells Fargo's Notice of Other Pending Actions, analyze potential impact on our case	0.1	\$425	\$ 42.50
2020-02-06	LCF	Review Wells Fargo's Notice of Pendency of Other Actions regarding new purported class claims in Pennsylvania, research docket on Westlaw	0.1	\$425	\$ 42.50
2020-02-07	LCF	Review Wells Fargo's most recently filed Notice of Pendency of Other Actions, attempt to research status and Complaints from the same, and review Complaint from federal court action, draft and send update to the team regarding two additional cases	0.3	\$425	\$ 127.50
		Project Total:	19.6		\$ 15,140.00
		Grand Total:	6877		\$ 3,758,689.00

EXHIBIT B

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Exhibit B to Joint Declaration of Michael Schrag and Richard Paul

List of All Depositions			
Role	Deponent	Location	Date
Wells Fargo 30(b)(6)	Robert Ferguson	Portland	7/10/2019
Wells Fargo Employee	Diane Young	Minneapolis	7/19/2019
Wells Fargo 30(b)(6)	Carmen Bell	San Francisco	8/2/2019
Wells Fargo Employee	Beena Menon	Charlotte	8/21/2019
Wells Fargo Employee	Susan Crawford	Los Angeles	11/14/2019
Wells Fargo Employee	Daniel Pheil	Los Angeles	11/14/2019
Wells Fargo Employee	Kara Reimers	Des Moines	11/20/2019
Defendant Expert	Christopher James	Oakland	1/23/2020
Defendant Expert	Peter Ross	Los Angeles	2/6/2020
Plaintiffs Expert	John Kilpatrick	Seattle	9/9/2019
Plaintiffs Expert	Dan Salah	Oakland	1/17/2020
Plaintiffs Expert	Brian Kelly	Los Angeles	2/4/2020
Named Plaintiff	Debora Granja	San Francisco	6/6/2019
Named Plaintiff	Alicia Hernandez	San Francisco	6/10/2019
Named Plaintiff	Troy Frye	San Francisco	6/11/2019
Named Plaintiff	Brenda Simoneaux	San Francisco	6/12/2019
Named Plaintiff	Russell Simoneaux	San Francisco	6/12/2019
Named Plaintiff	Diane Trevino	San Francisco	6/13/2019
Named Plaintiff	Emma White	San Francisco	6/17/2019
Named Plaintiff	John DeMartino	San Francisco	6/18/2019
Named Plaintiff	Yvonne DeMartino	San Francisco	6/18/2019
Named Plaintiff	Rose Wilson	San Francisco	6/20/2019
Named Plaintiff	Keith Lindner	San Francisco	6/21/2019
Named Plaintiff	Tiffannie Hood	Cincinnati	6/25/2019
Named Plaintiff	Coszetta Teague	Chicago	6/27/2019
Named Plaintiff	George Floyd	Philadelphia	7/2/2019
Named Plaintiff	Cyndi Floyd	Philadelphia	7/2/2019
Named Plaintiff	Sandra Campos	Los Angeles	12/10/2019
CA Putative Class Member	Alfonso Campos	Los Angeles	12/10/2019
CA Putative Class Member	Craig Enis	San Francisco	12/10/2019
CA Putative Class Member	Jerry Dela Cruz	San Francisco	12/10/2019
CA Putative Class Member	Jameel Hayden	Los Angeles	12/11/2019

CA Putative Class Member	Cathaline Gonzalez	San Francisco	12/11/2019
CA Putative Class Member	Charles Gomez	San Francisco	12/12/2019
CA Putative Class Member	Donna Perreault	San Francisco	12/16/2019
CA Putative Class Member	Scott Seymour	Ridgecrest (by phone)	12/17/2019
CA Putative Class Member	Ruben Gallardo	Fresno (by phone)	12/20/2019
CA Putative Class Member	Kimberly Gladman	Orange County	1/3/2020
CA Putative Class Member	Jason Hewitt	Medford	1/9/2020
CA Putative Class Member	Martha Montenegro	Los Angeles	1/13/2020
CA Putative Class Member	Derrick Cannon	Riverside	1/13/2020
CA Putative Class Member	Jose Chavez	Los Angeles	1/16/2020
CA Putative Class Member	Joseph Plescia	Los Angeles	1/17/2020
CA Putative Class Member	Anna Schulke	Kansas City	1/22/2020
CA Putative Class Member	Elizabeth Messana	San Francisco	1/24/2020
CA Putative Class Member	Hortensia Torres	Los Angeles	1/28/2020
Plaintiff Therapist	Dino Paris	Portland (by phone)	1/10/2020

EXHIBIT C

Case Costs - Summary

Airfare	\$	31,457.59
Ground Transportation		5,443.22
Litigation Support		5,401.70
Lodging		22,220.57
Meals		6,335.42
Postage & Delivery		2,664.93
Copies		5,580.31
Electronic Document Storage		6,449.00
Expert Witness Fees		139,196.32
Claims Administrator		1,427.50
Filing Fees		1,373.00
Research		52,988.09
Transcripts		<u>55,487.71</u>
	\$	<u><u>336,025.36</u></u>

Date	Name	Case Costs - Airfare	Amount
12/21/2018	United Airlines	Order to show cause (RMP from KC to Oakland)	657.40
01/07/2019	Delta Airlines	Motion to transfer venue hearing (RMP from Kansas City to Oakland)	364.00
01/28/2019	Delta Airlines	Motion to transfer venue hearing (change to hearing date)	199.00
02/16/2019	Delta Airlines	Motion to transfer venue hearing (change to hearing date)	372.00
03/15/2019	Delta Airlines	Rule 26(f) report and cmc (AGS from Kansas City to Oakland)	678.00
03/25/2019	Southwest Airlines	Rule 26(f) report and cmc (change to hearing time) (AGS from SFO to KC)	587.68
04/22/2019	Delta Airlines	Response to motion (5/23 hearing-RMP flight Kansas City to OAK, hearing date change)	200.00
05/16/2019	United Airlines	Response to motion (5/23 hearing-RMP from Kansas City to SFO)	881.60
05/23/2019	American Airlines	Deposition of Simoneaux (Airfare for Russell and Brenda Simoneaux to SFO)	1,160.00
05/24/2019	Delta Airlines	Deposition of Frye (Troy Frye airfare to deposition 6/10/19 - 6/11/19 (AGS - SFO)	948.00
05/24/2019	American Airlines	Deposition of Wilson (Rose Wilson one way airfare from Rochester to SFO)	309.00
05/28/2019	United	Airfare for class rep for GRANJA/DEBORA DEPO	25.00
05/28/2019	United	Airfare for class rep for GRANJA/DEBORA DEPO	25.00
05/29/2019	Delta Air	Airfare for class rep for WHITE/EMMA DEPO	356.00
05/29/2019	Alaska Air	Airfare for class rep for TREVINO/DIANA DEPO	316.59
05/29/2019	United	Airfare for class rep for GRANJA/DEBORA DEPO	399.60
05/30/2019	United	Airfare for class rep for HERNANDEZ/ALICIA DEPO	642.60
05/30/2019	United	Airfare for husband of class rep for HERNANDEZ/ALICIA DEPO	642.60
05/30/2019	United	Airfare for class rep for HERNANDEZ/ALICIA DEPO	179.00
05/30/2019	United	Airfare for class rep for HERNANDEZ/ALICIA DEPO	139.00
05/30/2019	United	Airfare for husband of class rep for HERNANDEZ/ALICIA DEPO	129.00
05/30/2019	United	Airfare for husband of class rep for HERNANDEZ/ALICIA DEPO	174.00
05/30/2019	Delta Airlines	Deposition of Granja and prep for others (6/5 Rick to SFO, or others 6/5/19 - 6/7/19)	908.00
05/31/2019	Delta Air	Airfare for class rep for WHITE/EMMA DEPO	327.00
05/31/2019	Delta Air	Airfare for class rep for WHITE/EMMA DEPO	19.99
05/31/2019	Alaska Airlines	Deposition of Frye, Simoneaux, Trevino (LCF from KC to SFO (6/10-6/13)	292.30
05/31/2019	United Airlines	Depositions of Frye, Simoneaux, Trevino (Laura to SFO (6/10-6/13) (changes/cancel)	200.00
06/04/2019	United	Airfare for class rep for John DeMartino Depo	19.00
06/04/2019	United	Airfare for class rep for Yvonne DeMartino Depo	29.00
06/04/2019	Delta Airlines	Deposition of White (6/16-6/17 RMP from Kansas City to SFO)	622.00
06/05/2019	United	Airfare for class rep for John DeMartino Depo	866.59
06/05/2019	United	Airfare for class rep for Yvonne DeMartino Depo	910.59
06/06/2019	Delta Airlines	Hearing for WFCo Mtn Dismiss and depo prep (for 6/19-6/20)	595.00
06/12/2019	Alaska Airlines	Deposition of Frye, Simoneaux, Trevino (LCF from SFO to KC (6/12)	599.00
06/13/2019	Southwest Airlines	Airfare for class rep for Diana Trevino depo	353.98
06/13/2019	Gogoair.com	Deposition of Frye, Simoneaux, Trevino	15.95
06/14/2019	Delta Airlines	Opposition to motion to dismiss (7/2-7/3 RMP from Kansas City to SFO)	999.00
06/21/2019	Southwest Airlines	Deposition of Floyd (LCF from Kansas City to Philadelphia, 7/1-7/2)	471.00
07/01/2019	Delta Airlines	Robert Ferguson 30(b)(6) deposition (7/9-7/10 RMP from Kansas City to Portland)	546.00
07/11/2019	United	JJB - Depo - Diana Young - MSP-->SFO	109.00
07/11/2019	United	JJB - Depo - Diana Young - MSP-->SFO	218.30
07/15/2019	United Airlines	Carmen Bell 30(b)(6) deposition (RMP, 8/1-8/2 KC to SFO)	667.60
07/27/2019	United Airlines	Carmen Bell 30(b)(6) deposition (8/1-8/2 KC to SFO) (change)	586.00
08/01/2019	Delta Airlines	Carmen Bell 30(b)(6) deposition, Rick 8/1/19 to 8/3/19 (MCI)	393.30
08/05/2019	United Airlines	Hearing on second amended complaint/motion (8/21-8/22 RMP KC to SFO)	450.60
08/08/2019		JJB - Depos - Southwest OAK-->CVG 06/24/19	559.18

Date	Name	Case Costs - Airfare	Amount
08/08/2019		JJB - Depos - Southwest CVG-->MDW 06/26/19	169.98
08/08/2019		JJB - Depos - Southwest MDW-->OAKCVG 06/27/19	568.98
08/08/2019		JJB - Depo - OAK-->MSP 07/17/19	218.98
08/20/2019	American Airlines	JJB - Depo - Charlotte, NC - CLT<-->JAX	767.10
11/04/2019	Alaska Air	JJB - Depo - Susan Crawford - CDA-->LAX	278.30
11/11/2019	Alaska Air	JJB - Depo - Susan Crawford - CDA-->LAX	119.00
11/12/2019	Alaska Air	JJB - Depo - Susan Crawford - CDA-->LAX	30.00
12/03/2019	Delta Airlines	Deposition of Campos and Hayden (LCF 12/9 Kansas City to LAX)	398.30
12/03/2019	Delta Airlines	Deposition of Campos and Hayden (LCF 12/9 Kansas City to LAX)	11.20
12/06/2019	Delta Airlines	Depos Campos, Cedillos; Expert report-Kelley RMP 12/9-12/13 SFO-->LAX & LAX-->KC	777.60
12/06/2019	United Airlines	Meet and confer and hearing RMP 12/9 from Kansas City to SFO	538.30
12/09/2019	Southwest Airlines	MLS - Expert meeting - SNA--OAK 12/12/19	311.98
12/12/2019	Delta Airlines	Depositions of Campos and Hayden (LCF 12/12 SFO to KC)	396.30
01/02/2020	Southwest Airlines	JJB - Depo - Kimberly Gladman - OAK-->SNA	225.98
01/02/2020	Southwest Airlines	JJB - Depo - Kimberly Gladman - SNA-->OAK	196.98
01/02/2020	Southwest Airlines	Deposition of Derrick Cannon (LCF from Kansas City to Ontario, CA)	307.20
01/07/2020	United	JJB - Jason Hewitt depo - seating/bag fees	62.00
01/07/2020	United	JJB - Jason Hewitt depo - seating/bag fees	55.00
01/07/2020	United	JJB - Jason Hewitt depo - SFO<-->MFR - 01/08/20-01/09/20	542.80
01/10/2020	Southwest Airlines	Anna Schulke flight for depo - PIT<-->MCI - 01/21/20-01/22/20	381.96
01/10/2020	Southwest Airlines	JJB - Depos - CA class members - OAK-->LAX - 01/12/20	189.98
01/10/2020	Southwest Airlines	Renewed motion for class certification (LCF 1/14 from Ontario, CA to SFO for hearing)	149.98
01/13/2020	Southwest Airlines	Renewed motion for class certification (LCF 1/14 from Ontario, CA to SFO for hearing)	40.00
01/15/2020	United Airlines	Renewed motion for class certification (LCF 1/15 from SFO to KC from hearing)	548.40
01/16/2020	Southwest Airlines	JJB - Depos - CA class members - LAX-->OAK - 01/17/20	189.98
01/20/2020	Delta Airlines	Deposition of Peter Ross, Kelley depo (RMP 2/3-2/6 Kansas City to LAX)	325.80
01/22/2020	Southwest Airlines	Refund - A. Schulke flight after late depo - MCI-->PIT - (co-counsel paid for new flight)	(221.80)
01/22/2020	United Airlines	Deposition of Anna Schulke (KC to Pittsburgh, return flight for Anna Schulke for depo)	412.20
01/22/2020	Southwest Airlines	Deposition of Anna Schulke (change to deponent Anna Schuke's flight)	221.80
01/23/2020	Delta Airlines	Deposition of Peter Ross, Kelley depo (RMP, 2/4-2/6 KC to LAX)	204.00
01/26/2020	Delta Airlines	Am Ex refund of change fee	(200.00)
01/27/2020	Southwest Airlines	JJB - Depo - Hortensia Torres - OAK-->LGB - 01/27/20	146.98
01/28/2020	Southwest Airlines	MLS - Depo - Kelley - OAK<-->BUR - 02/03/20-02/04/20	535.96
01/29/2020	Southwest Airlines	JJB - Depo - Hortensia Torres - LGB-->OAK - 01/29/20	233.98
01/31/2020	Delta Airlines	2/5 Laura to LAX, Peter Ross deposition	518.60
02/04/2020	Southwest Airlines	MLS - Depo - Kelley - 2/4 BUR --> OAK flight change	18.00
02/13/2020	United Airlines	Settlement conference with Judge Ryu (RMP, 3/3-3/4 from KC to SFO)	430.60
02/26/2020	Southwest Airlines	JJB - Settlement conference - LGB <--> OAK flight for client Sandra Campos	223.96
02/26/2020	United	Debora Granja- EUG<-->SFO - 03/02/20-03/04/20 (for settlement conference)	695.80
03/11/2020	Southwest Airlines	Sandra Campos flight for settlement conf - LGB<-->OAK - 03/02/20-03/03/20	291.98
		Total Airfare	31,457.59

Date	Name	Case Costs - Ground Transportation	Amount
01/02/2019	Uber Technologies	Order to show cause	152.97
01/02/2019	Bart	Order to show cause	8.00
01/03/2019	KCI Airport Parking	Order to show cause	46.00
01/03/2019	Uber Technologies	Order to show cause	95.04
01/03/2019	Bart	Order to show cause	4.00
02/20/2019	Uber Technologies	Motion to transfer venue	12.27
02/20/2019	Uber Technologies	Motion to transfer venue	81.82
02/20/2019	Bart	Motion to transfer venue	20.00
02/21/2019	Uber Technologies	Motion to transfer venue	14.60
02/23/2019	KCI Airport Parking	Motion to transfer venue	46.00
03/27/2019	Uber Technologies	Rule 26(f) report and case management conference	76.98
03/28/2019	Uber Technologies	Rule 26(f) report and case management conference	52.87
03/28/2019	Uber Technologies	Rule 26(f) report and case management conference	27.20
03/29/2019	Uber Technologies	Rule 26(f) report and case management conference	61.18
03/29/2019	KCI Airport Parking	Rule 26(f) report and case management conference	69.00
05/23/2019	KCI Airport Parking	Response to motion to dismiss original complaint	44.00
05/23/2019	Uber Technologies	Response to motion to dismiss original complaint	99.98
05/23/2019	Uber Technologies	Response to motion to dismiss original complaint	20.74
05/29/2019	Uber	LPL - Motion to dismiss opposition - Late taxi	25.35
06/05/2019	Uber Technologies	Deposition of Granja	84.20
06/05/2019	Uber Technologies	Deposition of Granja	12.56
06/06/2019	Lyft	LPL - Depo of Debora Granja	9.95
06/06/2019	Uber Technologies	Deposition of Granja	67.99
06/06/2019	Uber Technologies	Deposition of Granja	10.19
06/06/2019	Uber Technologies	Deposition of Granja	17.32
06/06/2019	Uber Technologies	Deposition of Granja	46.32
06/06/2019	Uber Technologies	Deposition of Granja	7.24
06/06/2019	Uber Technologies	Deposition of Granja	15.33
06/06/2019	Lyft	Deposition of Granja	12.88
06/07/2019	KCI Airport Parking	Deposition of Granja	69.00
06/07/2019	Uber Technologies	Deposition of Granja	86.11
06/07/2019	Uber Technologies	Deposition of Granja	12.91
06/10/2019	Bart	Deposition of Frye	20.00
06/11/2019	Bart	Deposition of Simoneaux	20.00
06/12/2019	Uber	JJB - Depos	4.00
06/12/2019	Uber	JJB - Depos	33.20
06/12/2019	Uber Technologies	Deposition of Frye, Simoneaux, Trevino	17.80
06/13/2019	Uber	JJB - Depos	39.58
06/13/2019	GetRide	Deposition of Trevino	51.45
06/13/2019	Park Air Express	Deposition of Frye, Simoneaux, Trevino	36.00
06/13/2019	Uber Technologies	Deposition of Frye, Simoneaux, Trevino	6.16
06/16/2019	Uber	LPL - Emma White depo prep	10.99
06/16/2019	Specialty's	LPL - Emma White depo prep	7.31
06/17/2019	Uber	LPL - Emma White depo prep	28.80
06/20/2019	Debora Granja	Depo trip - Lyft rides (3)	52.93
06/29/2019	Uber	JJB - Depo - Coszetta Teague - OAK to home	23.59

Date	Name	Case Costs - Ground Transportation	Amount
07/02/2019	Uber Technologies	Opp. to Wells Fargo & Company's motion to dismiss	76.87
07/02/2019	Uber Technologies	Opp. to Wells Fargo & Company's motion to dismiss	11.53
07/02/2019	Bart	Opp. to Wells Fargo & Company's motion to dismiss	20.00
07/03/2019	Uber Technologies	Opp. to Wells Fargo & Company's motion to dismiss	71.34
07/03/2019	Uber Technologies	Opp. to Wells Fargo & Company's motion to dismiss	14.89
07/03/2019	Uber Technologies	Opp. to Wells Fargo & Company's motion to dismiss	13.00
07/03/2019	Uber Technologies	Deposition of Floyd	9.50
07/03/2019	KCI Airport Parking	Deposition of Floyd	40.00
07/03/2019	KCI Airport Parking	Opp. to Wells Fargo & Company's motion to dismiss	46.00
07/09/2019	Uber Technologies	Robert Ferguson 30(b)(6) deposition	70.96
07/10/2019	Uber Technologies	Robert Ferguson 30(b)(6) deposition	42.57
07/11/2019	KCI Airport Parking	Robert Ferguson 30(b)(6) deposition	46.00
07/12/2019	Uber	LPL - Motion to amend - Late taxi	22.50
07/12/2019	Rose Wilson	Depo Wilson (reimb to plaintiff San Francisco to San Jose on 6/20/19-in lieu of airfare)	132.98
07/18/2019	Uber	JJB - Depo - Diana Young	21.57
07/20/2019	Uber	JJB - Depo - Diana Young	28.70
07/31/2019	Lyft	LPL - Motion for partial summary judgment - Late taxi	27.41
08/01/2019	Uber	Carmen Bell 30(b)(6) deposition	76.18
08/01/2019	Uber	Carmen Bell 30(b)(6) deposition	103.58
08/03/2019	Uber	Carmen Bell 30(b)(6) deposition	89.89
08/03/2019	KCI Airport Parking	Carmen Bell 30(b)(6) deposition	69.00
08/08/2019	Lyft	JJB - Depos - Lyft KY to OH	21.89
08/08/2019	Lyft	JJB - Depos - Lyft OH to KY	22.75
08/08/2019	Lyft	JJB - Depos - Lyft IL	45.55
08/08/2019	BART	JJB - BART 06/16/19, 06/18/19, 06/20/19	27.00
08/21/2019	Taxi	JJB - Depo - Charlotte, NC	30.50
11/06/2019	Lyft	MLS - Meeting w/ R. Paul & A. Schwartz	10.00
11/06/2019	Lyft	MLS - Meeting w/ R. Paul & A. Schwartz	12.88
11/13/2019	Lyft	JJB - Depo - Susan Crawford - LAX to hotel	32.33
11/13/2019	Uber	JJB - Depo - Susan Crawford - To airport	17.55
11/14/2019	Lyft	JJB - Depo - Susan Crawford - OAK to home	31.53
11/14/2019	Lyft	JJB - Depo - Susan Crawford - Depo to LAX	32.80
11/14/2019	Uber	JJB - Depo - Susan Crawford - Hotel to depo	7.40
11/21/2019	Lyft	LPL - Class cert motion, late night transportation	21.36
12/04/2019	Laura Fellows	Deposition of Kara Reimers	246.50
12/09/2019	Uber	Deposition of Campos (RMP)	68.40
12/10/2019	Uber	Deposition of Hayden (LCF)	30.46
12/10/2019	Uber	Deposition of Cedillos (RMP)	96.00
12/10/2019	Uber	Deposition of Cedillos (RMP)	71.78
12/11/2019	Lyft	MLS - Expert meeting	9.77
12/11/2019	Parking	Deposition of Hayden (client parking for Hayden's deposition)	38.00
12/11/2019	Uber	Deposition of Campos (client transportation from depo to home)	32.92
12/12/2019	Lyft	MLS - Expert meeting	12.51
12/12/2019	KCI Airport Parking	Depositions of Campos and Hayden (LCF)	92.00
12/12/2019	Lyft	Expert report- Brian Kelley (RMP)	3.94
12/13/2019	Uber	MLS - Expert meeting	12.75

Date	Name	Case Costs - Ground Transportation	Amount
12/13/2019	Uber	MLS - Expert meeting	10.94
12/13/2019	Enterprise	Expert report-Brian Kelley (RMP meet with Kelley 12/12-12/13)	81.20
12/13/2019	KCI Airport Parking	Expert report- Brian Kelley (RMP)	115.00
12/13/2019	Westin	Expert report-Brian Kelley (RMP)	48.40
12/13/2019	Uber	Deposition of Campos (LCF)	35.95
01/02/2020	Lyft	JJB - Depo - Kimberly Gladman - SNA to hotel	13.30
01/02/2020	Lyft	JJB - Depo - Kimberly Gladman - Office to OAK	20.40
01/05/2020	Lyft	JJB - Depo - Kimberly Gladman - OAK to office	19.02
01/08/2020	Lyft	JJB - Jason Hewitt depo - MFR to hotel	18.89
01/09/2020	Lyft	JJB - Jason Hewitt depo - SFO to office	41.74
01/09/2020	Lyft	JJB - Jason Hewitt depo - Hotel to dinner	13.72
01/11/2020	Uber	JJB - Depos - CA class members - Home-->OAK	20.12
01/12/2020	Uber	JJB - Depos - CA class members - To hotel	27.71
01/12/2020	Lyft	Deposition of Derrick Cannon (LCF)	36.31
01/13/2020	Lyft	Deposition of Derrick Cannon (LCF)	6.84
01/13/2020	Lyft	Deposition of Derrick Cannon (LCF)	6.83
01/14/2020	Lyft	Deposition of Derrick Cannon (LCF)	33.17
01/14/2020	Bart	Renewed motion for class certification (LCF)	20.00
01/15/2020	Uber	LPL - Class cert hearing - Uber w/ co-counsel office to home/lodging the evening before	25.42
01/15/2020	KCI Airport Parking	Renewed motion for class certification, Deposition of Cannon (LCF)	62.00
01/15/2020	Uber	Renewed motion for class certification (LCF)	9.98
01/17/2020	Lyft	MLS - Depo - Kelley - LYFT *RIDE FRI 8AM	9.11
01/17/2020	Uber	JJB - Depos - CA class members - Hotel to train	7.16
01/20/2020	Uber	JJB - Depos - CA class members - OAK to home	20.61
01/27/2020	Lyft	JJB - Depo - Hortensia Torres - LGB-->hotel	42.70
01/27/2020	Lyft	JJB - Depo - Hortensia Torres - Office -->OAK	22.78
01/29/2020	Uber	JJB - Depo - Hortensia Torres - Hotel to LGB (tip)	3.00
01/29/2020	Uber	JJB - Depo - Hortensia Torres - OAK to office	21.39
01/29/2020	Uber	JJB - Depo - Hortensia Torres - Hotel to LGB	36.46
02/03/2020	Lyft	MLS - Depo - Kelley - LYFT *RIDE MON 11AM	31.27
02/03/2020	Lyft	MLS - Depo - Kelley - LYFT *RIDE MON 8AM	31.99
02/04/2020	Lyft	MLS - Depo - Kelley - LYFT *RIDE TUE 6PM	28.76
02/04/2020	Uber	Deposition of Peter Ross, Kelley depo (RMP)	13.10
02/04/2020	Uber	Responding to subpoena to Kelley/defending Kelley depo (RMP)	103.14
02/05/2020	Richard P Neal	Deposition of Anna Schulke (Schulke trip to KC airport from depo)	39.40
02/06/2020	Uber	Deposition of Peter Ross (RMP)	88.63
02/06/2020	Uber	Deposition of Peter Ross (RMP)	10.10
02/07/2020	KCI Airport Parking	Deposition of Peter Ross, Responding to subpoena to Kelley/defending Kelley depo	69.00
02/21/2020	Lyft	LPL - Filing - Late night	30.87
03/03/2020	Uber	Settlement conference with Judge Ryu (RMP)	35.78
03/03/2020	Uber	Settlement conference with Judge Ryu (RMP)	14.10
03/03/2020	Uber	Settlement conference with Judge Ryu (RMP)	90.04
03/03/2020	Uber	Settlement conference with Judge Ryu (RMP)	15.45
03/04/2020	Lyft	LPL - Late filing transportation home	30.22
03/04/2020	KCI Airport Parking	Settlement conference with Judge Ryu (RMP)	46.00
03/05/2020	Sandra Campos	Settlement conf - Home to LGB	16.52

<u>Date</u>	<u>Name</u>	<u>Case Costs - Ground Transportation</u>	<u>Amount</u>
03/05/2020	Sandra Campos	Settlement conf - OAK to conf	19.19
03/05/2020	Sandra Campos	Settlement conf - Conf to OAK	30.80
03/05/2020	Sandra Campos	Settlement conf - LGB to home	14.99
03/06/2020	Lyft	LPL - Late filing transportation home	28.87
		Total Ground Transportation	<u>5,443.22</u>

Date	Name	Case Costs - Litigation Support	Amount
01/14/2019	Class Action Res & Litigation	12/07/18 Personal service Wells Fargo Bank	96.75
01/14/2019	Class Action Res & Litigation	12/18/18 Personal service Wells Fargo Bank	125.00
01/14/2019	Class Action Res & Litigation	12/21/18 Superior Court of NJ - Obtain copies of filed documents	270.00
02/14/2019	Class Action Res & Litigation	01/11/19 Chambers copies	152.75
03/18/2019	Class Action Res & Litigation	02/11/19 Chambers copies	120.00
03/18/2019	Class Action Res & Litigation	12/24/18 Chambers copies	120.00
04/22/2019	Class Action Res & Litigation	03/01/19 Chambers copies	107.50
04/22/2019	Class Action Res & Litigation	03/04/19 Chambers copies	95.00
05/14/2019	Class Action Res & Litigation	03/08/19 Chambers copies	90.00
05/14/2019	Class Action Res & Litigation	03/15/19 Chambers copies	90.00
05/14/2019	Class Action Res & Litigation	03/15/19 Chambers copies	120.00
05/14/2019	Class Action Res & Litigation	04/26/19 Chambers copies	124.95
06/20/2019	Class Action Res & Litigation	03/26/19 Chambers copies	95.00
08/28/2019	Class Action Res & Litigation	05/17/19 Chambers copies	90.00
08/28/2019	Class Action Res & Litigation	05/22/19 Chambers copies	90.00
08/28/2019	Class Action Res & Litigation	05/29/19 Chambers copies	281.50
08/28/2019	Class Action Res & Litigation	06/28/19 Chambers copies	90.00
09/20/2019	Class Action Res & Litigation	06/27/19 Chambers copies	99.25
09/20/2019	Class Action Res & Litigation	07/12/19 Chambers copies	108.00
09/20/2019	Class Action Res & Litigation	07/17/19 Chambers copies	113.50
09/20/2019	Class Action Res & Litigation	07/30/19 Chambers copies	170.75
09/20/2019	Class Action Res & Litigation	08/05/19 Chambers copies	90.00
10/07/2019	Class Action Res & Litigation	08/27/19 Chambers copies	107.75
10/07/2019	Class Action Res & Litigation	08/30/19 Chambers copies	246.75
10/07/2019	Class Action Res & Litigation	09/24/19 Chambers copies	120.00
12/12/2019	Class Action Res & Litigation	09/03/19 Chambers copies	103.75
12/12/2019	Class Action Res & Litigation	10/04/19 Chambers copies	116.00
12/12/2019	Class Action Res & Litigation	10/17/19 Chambers copies	95.00
12/12/2019	Class Action Res & Litigation	11/05/19 Chambers copies	95.00
12/12/2019	Class Action Res & Litigation	11/22/19 Chambers copies	339.15
12/31/2019	Class Action Res & Litigation	12/13/19 Chambers copies	55.00
02/28/2020	Class Action Res & Litigation	12/05/19 Chambers copies	95.00
02/28/2020	Class Action Res & Litigation	12/26/19 Chambers copies	95.00
02/28/2020	Class Action Res & Litigation	01/06/20 Chambers copies	132.00
02/28/2020	Class Action Res & Litigation	01/23/20 Chambers copies	95.00
02/29/2020	ASAP LEGAL LLC	JJB - Obtain S. Campos Notice of Trustee's Sale from LA County Recorder	94.00
03/19/2020	Class Action Res & Litigation	02/06/20 Chambers copies	109.25
03/19/2020	Class Action Res & Litigation	01/07/20 Chambers copies	106.50
03/19/2020	Class Action Res & Litigation	02/21/20 Chambers copies	135.50
04/29/2020	Class Action Res & Litigation	03/03/20 Chambers copies	125.00
04/29/2020	Class Action Res & Litigation	03/05/20 Chambers copies	125.00
04/29/2020	Class Action Res & Litigation	03/06/20 Chambers copies	271.10
Total Litigation Support			5,401.70

Date	Name	Case Costs - Lodging	Amount
01/03/2019	Marriott	RMP- Order to show cause (San Francisco)- 1 night	175.04
02/22/2019	Westin	RMP- Motion to transfer venue (San Francisco)- 1 night	447.36
03/29/2019	W Hotel	AGS- Rule 26(f) report and case management conference (San Francisco)-2 nights	857.16
05/23/2019	Hotel Adagio	RMP- Response to motion to dismiss original complaint (San Francisco)-1 night	522.70
05/30/2019	HOTEL TRITON	Debora Granja hotel for depo - 1 night	335.53
06/01/2019	Expedia	Emma White hotel for depo - 2 nights	549.66
06/07/2019	Marriott	RMP- Deposition of Granja and prep for other depositions (San Francisco)- 2 nights	1,265.24
06/07/2019	Hotwire Sales	John DeMartino hotel for depo - 1 night	290.75
06/08/2019	Hotwire Sales	Russell Simoneaux hotel for depo - 1 night	189.38
06/08/2019	Hotwire Sales	Diana Trevino hotel for depo - 1 night	274.06
06/08/2019	Hotwire Sales	Troy Frye hotel for depo - 1 night	306.94
06/10/2019	Le Meridien	Alicia Hernandez depo - hotel charges	42.20
06/11/2019	HOTEL TRITON	Russell Simoneaux depo - hotel charges	29.11
06/11/2019	VILLA FLORENCE	Troy Frye depo - hotel charges	39.89
06/13/2019	Hilton	LCF- Depositions of Frye, Simoneaux, Trevino (San Francisco) - 3 nights	1,459.60
06/13/2019	VILLA FLORENCE	Diana Trevino depo - hotel charges	39.89
06/14/2019	Campton Place	John DeMartino depo - hotel charges	34.88
06/19/2019	Hotwire Sales	Rose Wilson hotel for depo - 1 night	205.19
06/20/2019	Hotwire Sales	Keith Lindner hotel for depo - 1 night	258.49
06/25/2019	Hotwire Sales	JJB - Depo - Tiffanie Hood - 1 night	178.83
06/28/2019	LONDON HOUSE CHICAGO	JJB - Depo - Coszetta Teague - 1 night	176.10
07/02/2019	Embassy Suites	LCF- Deposition of Floyd (Philadelphia)- 1 night	184.84
07/03/2019	Hilton	LCF- Deposition of Floyd (flight delay caused overnight in St. Louis)- 1 night	152.94
07/03/2019	Park Central Hotel	RMP- Opp. to Wells Fargo & Company's motion to dismiss- 1 night	226.42
07/10/2019	Hi-Lo	RMP- Robert Ferguson 30(b)(6) deposition (Portland)- 1 night	338.42
07/19/2019	Crowne Plaza	JJB - Depo - Diana Young - 2 nights	463.92
08/02/2019	W San Francisco	RMP- Carmen Bell 30(b)(6) deposition (San Francisco)- 1 night	272.21
08/03/2019	Marriott	RMP - Carmen Bell 30(b)(6) deposition (San Francisco)- 1 night	217.67
08/08/2019		JJB - Depos - Hotel Cincinnati 06/24/19	320.78
08/08/2019		JJB - Depos - Hotel Chicago 06/26/19 & 06/27/19	686.03
08/21/2019	San Francisco Moscone	Hearing (late cancellation for hearing canceled with short notice)	364.59
11/07/2019	Hotwire Sales	JJB - Depo - Susan Crawford - 1 night	201.90
11/20/2019	Hyatt Place	LCF- Deposition of Kara Reimers (Des Moines)- 1 night	209.56
12/08/2019	Oakland Marriott City Center	RMP- Motion hearing (Oakland)- 1 night	378.25
12/13/2019	Westin Bonaventure	RMP- Depositions of Campos, Cedillos, Expert report-Brian Kelley (Los Angeles)- 3 nights	1,474.96
12/13/2019	Westin	RMP- Expert report-Brian Kelley (hotel for meeting with Kelley) (Los Angeles)- 1 night	350.16
12/13/2019	Westin	LCF- Depositions of Campos and Hayden (Los Angeles)- 3 nights	1,425.35
12/17/2019	Hyatt	Donna Perreault hotel for depo - 2 nights	476.08
01/03/2020	Doubletree Hotels	JJB - Depo - Kimberly Gladman - Hotel 01/02/20	96.98
01/09/2020	Holiday Inn	JJB - Jason Hewitt depo - Hotel 01/08/20	125.89
01/14/2020	Marriott	LCF- Deposition of Derrick Cannon (Riverside)- 2 nights	464.20
01/16/2020	Omni Hotel	JJB - Depos - CA class members - Hotel - 01/12/20-01/14/20	838.62
01/21/2020	Omni Hotel	JJB - Depos - CA class members - Hotel - 01/15/20-01/16/20	649.91
01/22/2020	Hampton Inn	Deponent Anna Schulke-Deposition of Anna Schulke (in Kansas City)- 1 night	144.48
01/28/2020	WWW.RESERVATIONS.COM	MLS - Depo - Kelley - Booking fee (Ace Hotel)	19.99
01/29/2020	Hotel Reservations	MLS - Depo - Kelley - 02/03/20 (Ace Hotel)	336.41

Date	Name	Case Costs - Lodging	Amount
01/30/2020	Omni Hotel	JJB - Depo - Hortensia Torres - Hotel 01/27/20-01/28/20	900.94
02/02/2020	JW Marriott	Responding to subpoena/defending Kelley depo (Expert Kelley room) (LA)- 1 night	453.51
02/05/2020	JW Marriott	Deposition of Peter Ross, Responding to subpoena to Kelley/defending Kelley depo	124.28
02/06/2020	JW Marriott	RMP-Deposition of Peter Ross, Kelley depo-3 nights	1,259.53
03/04/2020	Marriott Hotels	Settlement conf - Sandra Campos lodging - 03/02/20	251.59
03/05/2020	Westin	RMP- Settlement conference with Judge Ryu (San Francisco)- 1 night	435.85
03/05/2020	Marriott Hotels	Settlement conf - Debora Granja lodging & parking 03/02/20 & 03/03/20	696.31
Total Lodging			<u>22,220.57</u>

Date	Name	Case Costs - Meals	Amount
01/02/2019	Plenty	MLS - w/ co-counsel - prep for meet & confer	31.05
01/03/2019	PIZZAIOLO	MLS - w/ co-counsel - prep for OSC hearing	207.62
01/03/2019	Philz Coffee	Order to show cause	18.64
01/03/2019	Union Street Gastro Pub	Order to show cause	31.32
02/20/2019	Smash Burger	Motion to transfer venue	12.06
02/20/2019	Paradies	Motion to transfer venue	5.47
02/20/2019	Farallon Restaurant	Motion to transfer venue	111.94
02/21/2019	PHILZ COFFEE	MLS - Hearing	31.42
03/27/2019	Delta Airlines	Rule 26(f) report and case management conference	9.00
03/27/2019	Delta Airlines	Rule 26(f) report and case management conference	10.99
03/27/2019	Delta Airlines	Rule 26(f) report and case management conference	9.00
03/27/2019	HMS Host Div	Rule 26(f) report and case management conference	21.55
03/28/2019	B-Dama	MLS - CMC	31.42
03/29/2019	Willow Creek Grill	Rule 26(f) report and case management conference	19.52
05/22/2019	Pronto	Response to motion to dismiss original complaint	18.27
05/23/2019	World Duty Free	Response to motion to dismiss original complaint	10.38
05/23/2019	Mission Bar and Grill	Response to motion to dismiss original complaint	73.38
05/23/2019	Fountain Cafe	Response to motion to dismiss original complaint	10.54
05/29/2019	Debora Granja	Deposition per diem for meals - 2 days	150.00
05/31/2019	Alicia Hernandez	Deposition per diem for meals - 2 days	150.00
05/31/2019	Troy Frye	Deposition per diem for meals - 2 days	150.00
05/31/2019	Russell Simoneaux	Deposition per diem for meals - 2 days	150.00
05/31/2019	Brenda Simoneaux	Deposition per diem for meals - 2 days	150.00
05/31/2019	Diana Trevino	Deposition per diem for meals - 2 days	150.00
05/31/2019	Keith Lindner	Deposition per diem for meals - 2 days	150.00
05/31/2019	Emma White	Deposition per diem for meals - 3 days	225.00
05/31/2019	John DeMartino	Deposition per diem for meals - 2 days	150.00
05/31/2019	Yvonne DeMartino	Deposition per diem for meals - 2 days	150.00
05/31/2019	Rose Wilson	Deposition per diem for meals - 2 days	150.00
06/06/2019	Zingari Ristorante	Deposition of Granja	110.02
06/06/2019	Jamba Juice	Deposition of Granja	6.49
06/06/2019	Waterfront Restaurant	Deposition of Granja	82.18
06/07/2019	HN Discovery	Deposition of Granja	13.38
06/10/2019	illy Caffè	Deposition of Frye	16.17
06/11/2019	Specialty's	JJB - Depos	13.03
06/11/2019	Specialty's	Deposition of Frye	12.69
06/11/2019	Uber Eats	Deposition of Simoneaux	20.91
06/12/2019	Specialty's	JJB - Depos	14.89
06/12/2019	Specialty's	Deposition of Simoneaux	13.23
06/13/2019	Analog	LPL - Lunch w/ Diana Trevino	25.95
06/13/2019	Specialty's	LPL - Emma White depo	10.33
06/13/2019	VILLA FLORENCE	LPL - Diana Trevino depo - Hotel meal	36.45
06/13/2019	Specialty's	Deposition of Trevino	10.46
06/13/2019	Uber Eats	Deposition of Trevino	23.49
06/16/2019	FAR EAST CAFE	JJB - Depos	68.75
06/17/2019	Specialty's	LPL - Emma White depo prep	14.38

Date	Name	Case Costs - Meals	Amount
06/17/2019	Hilton Hotels	LPL - Emma White depo prep - Hotel meals	60.45
06/18/2019	Specialty's	JJB - Depos	8.03
06/19/2019	Hilton Hotels	LPL - Emma White depo prep - Hotel meals	3.00
06/19/2019	Hilton Hotels	LPL - Emma White depo prep - Hotel meals	6.00
06/20/2019	Specialty's	JJB - Depos	11.51
06/24/2019	SKYLINE CHILI	JJB - Depo - Tiffanie Hood	16.90
06/24/2019	THE EAGLE	JJB - Depo - Tiffanie Hood	37.03
06/25/2019	Bagel Stop	JJB - Depo - Tiffanie Hood	3.98
06/25/2019	JEFF RUBY STEAKHOUSE	JJB - Depo - Tiffanie Hood	40.00
06/26/2019	PORTILLOS HOT DOGS	JJB - Depo - Coszetta Teague	16.02
06/27/2019	CATCH THIRTY FIVE	JJB - Depo - Coszetta Teague	43.78
06/28/2019	Broken English Taco Pub	JJB - Depo - Coszetta Teague	30.00
06/28/2019	Airport Food	JJB - Depo - Coszetta Teague	17.71
06/28/2019	LONDON HOUSE CHICAGO	JJB - Depo - Coszetta Teague - Hotel meal	24.08
07/01/2019	Starbucks	Deposition of Floyd	7.92
07/01/2019	Good to Go Deli	Deposition of Floyd	10.14
07/01/2019	Hudson News	Deposition of Floyd	3.70
07/01/2019	Asia on the Parkway	Deposition of Floyd	25.38
07/01/2019	Paradies	Deposition of Floyd	24.41
07/02/2019	Paradies	Opp. to Wells Fargo & Company's motion to dismiss	5.47
07/02/2019	Hakkasan San Francisco	Opp. to Wells Fargo & Company's motion to dismiss	72.26
07/02/2019	Corner Bakery Cafe	Deposition of Floyd	11.31
07/02/2019	Hudson News	Deposition of Floyd	14.29
07/03/2019	PHILZ COFFEE	MLS - Hearing	26.04
07/03/2019	Green Beans Coffee Co	Opp. to Wells Fargo & Company's motion to dismiss	13.29
07/03/2019	Starbucks	Deposition of Floyd	4.69
07/09/2019	Portland Burger	Robert Ferguson 30(b)(6) deposition	19.41
07/10/2019	Paradies	Robert Ferguson 30(b)(6) deposition	2.99
07/10/2019	HMS Host Div	Robert Ferguson 30(b)(6) deposition	15.98
07/10/2019	Hi-Lo	Robert Ferguson 30(b)(6) deposition	64.00
07/10/2019	Great Harvest	Robert Ferguson 30(b)(6) deposition	12.75
07/12/2019	Laura Fellows	Deposition of Frye, Simoneaux, Trevino	78.25
07/18/2019	Radisson Hotel	JJB - Depo - Diana Young - MSP-->SFO	38.00
08/01/2019	Plenty	MLS - Depo prep w/ co-counsel	45.70
08/01/2019	Paradies	Carmen Bell 30(b)(6) deposition	5.47
08/01/2019	Jamba Juice	Carmen Bell 30(b)(6) deposition	6.49
08/02/2019	THE WOLF	MLS - Depo prep w/ co-counsel	141.12
08/02/2019	CVS	Carmen Bell 30(b)(6) deposition	3.52
08/02/2019	Roys San Francisco	Carmen Bell 30(b)(6) deposition	92.14
10/30/2019	Cosecha Cafe	MLS - Lunch meeting w/ R. Paul, JJB & LPL	32.42
11/13/2019	WATER GRILL	JJB - Depo - Susan Crawford - To airport	45.00
11/14/2019	URTH CAFFE	JJB - Depo - Susan Crawford	25.79
11/14/2019	Biltmore	JJB - Depo - Susan Crawford - Hotel meal	31.11
11/19/2019	Taco Bell	Deposition of Kara Reimers	9.73
11/20/2019	Caviar	Class cert filing - Team dinner	118.20
11/20/2019	Potbelly	Deposition of Kara Reimers	10.73

Date	Name	Case Costs - Meals	Amount
12/09/2019	Paradies	Depositions of Campos and Hayden (LCF)	3.27
12/09/2019	Starbucks	Depositions of Campos and Hayden (LCF)	8.21
12/09/2019	Westin	Deposition of Hayden (lunch with Mr. Hayden and LCF)	59.56
12/09/2019	Golden Era Vegan	Deposition of Campos (RMP)	23.38
12/09/2019	Border Grill	Deposition of Campos (RMP & LCF)	99.95
12/09/2019	Paradies	Deposition of Campos and Hayden (LCF)	9.29
12/10/2019	Cafe/Coffee	LPL - Depos in SF	13.83
12/10/2019	Drago Centro	Deposition of Cedillos (RMP)	112.36
12/10/2019	Asian Box	Deposition of Campos (RMP)	13.67
12/11/2019	Joey DTLA	Deposition of Campos and Hayden (RMP & LCF)	141.91
12/12/2019	KALA TRUCK	MLS - Expert meeting	41.11
12/12/2019	Soundstage Market	Depositions of Campos and Hayden (LCF)	3.82
12/13/2019	Airport Food	MLS - Expert meeting	13.18
12/13/2019	Taste of LA	Expert report- Brian Kelley (RMP)	9.18
12/16/2019	Hyatt	JJB - Lunch w/ Donna & Bill Perreault before depo	92.04
01/02/2020	Max's	JJB - Depo - Kimberly Gladman	18.15
01/03/2020	Starbucks	JJB - Depo - Kimberly Gladman	4.75
01/08/2020	Airport Food	JJB - Depo - Jason Hewitt - Aiport meal	40.36
01/09/2020	Uber	JJB - Jason Hewitt depo - Dinner to MFR	6.84
01/09/2020	TEXAS ROADHOUSE	JJB - Jason Hewitt depo	25.00
01/12/2020	Cafe/Coffee	JJB - Depos - CA class members	30.14
01/12/2020	HMS Host Div	Deposition of Derrick Cannon (LCF)	5.84
01/14/2020	District	LPL - Class cert hearing - Meal w/ co-counsel the evening before	86.94
01/14/2020	CORNER BAKERY	JJB - Depos - CA class members	20.97
01/14/2020	HAE JANG CHON REST	JJB - Depos - CA class members	60.00
01/14/2020	Hudson News	Renewed motion for class certification (LCF)	8.11
01/14/2020	Paradies	Renewed motion for class certification (LCF)	10.98
01/15/2020	Yard House	JJB - Depos - CA class members	35.44
01/15/2020	DAN TANA RESTAURANT	JJB - Depos - CA class members	48.00
01/15/2020	VILLA MORELIANA	JJB - Depos - CA class members	13.25
01/15/2020	Brenda's French Soul Food	Renewed motion for class certification (LCF & LPL)	43.18
01/15/2020	District Market	Renewed motion for class certification (LCF)	11.94
01/16/2020	Plenty	MLS - Depo prep - Dan Salah	35.65
01/16/2020	EGGSLUT	JJB - Depos - CA class members	14.80
01/16/2020	Omni Hotel	JJB - Depos - CA class members - Hotel meal	54.99
01/16/2020	Omni Hotel	JJB - Depos - CA class members - Hotel meal	60.92
01/21/2020	Omni Hotel	JJB - Depos - CA class members - Hotel meal	36.76
01/22/2020	Jimmy John's	Deposition of Anna Schulke (counsel and deponent)	88.40
01/23/2020	Lunch - cash	AMM - w/ EHG & MLS - Class cert hearing	32.23
01/29/2020	EGGSLUT	JJB - Depo - Hortensia Torres	17.32
01/29/2020	Airport Food	JJB - Depo - Hortensia Torres	5.51
01/30/2020	Omni Hotel	JJB - Depo - Hortensia Torres - Hotel meal	35.76
02/04/2020	Trimana	MLS - Depo - Kelley	13.71
02/04/2020	Airport Food	MLS - Depo - Kelley	19.57
02/04/2020	Ace Hotel	MLS - Depo - Kelley - Hotel meal(s)	58.98
02/04/2020	Paradies	Deposition of Peter Ross, Kelley depo (RMP)	9.29

<u>Date</u>	<u>Name</u>	<u>Case Costs - Meals</u>	<u>Amount</u>
02/05/2020	OCHO MEXICAN GRILL	MLS - Depo - Kelley	49.92
02/06/2020	For Five Coffee	Deposition of Peter Ross (RMP)	12.65
03/03/2020	Beauty's Bagel	MLS - Settlement conf prep w/ R. Paul, L. Lam, S. Campos & D. Granja	36.75
03/03/2020	Debora Granja	Settlement conf per diem	75.00
03/03/2020	Sandra Campos	Settlement conf per diem	75.00
03/03/2020	District Market	Settlement conference with Judge Ryu (RMP)	11.71
03/04/2020	DOPO	MLS - Settlement conference - Dinner with Rick Paul	111.05
03/04/2020	Colombo Frozen Yogurt	Settlement conference with Judge Ryu (RMP)	11.21
03/05/2020	Caviar	LPL - Opposition to motion - team dinner	100.92
03/31/2020	Clustertruck	Motion for Preliminary Approval	35.11
		Total Meals	<u>6,335.42</u>

Date	Name	Case Costs - Postage & Delivery	Amount
12/15/2018	FedEx	12/06/18 Eva Reiner	60.65
01/21/2019	FedEx	01/04/19 Ana M. Dub Official Court Reporter	20.25
02/16/2019	FedEx	01/31/19 Amanda Groves	26.24
02/28/2019	Postage	Business reply envelopes to non-class member Rhonda Spires	17.12
03/02/2019	FedEx	02/21/19 Juan Serrano	47.97
03/02/2019	FedEx	02/21/19 Bartoleme Jesus Vidal Coda	63.97
03/02/2019	FedEx	02/21/19 Vinicio Vera	30.97
03/02/2019	FedEx	02/21/19 Tirso Paisano	47.97
03/02/2019	FedEx	02/25/19 Bartoleme Jesus Vidal Coda-->GLG	27.36
03/02/2019	FedEx	02/26/19 Juan Serrano-->GLG	27.36
03/02/2019	FedEx	02/28/19 Amanda L. Groves	26.10
03/16/2019	FedEx	03/04/19 Tirso Paisano	29.44
03/30/2019	FedEx	03/14/19 Vinicio Vera-->GLG	27.42
03/30/2019	FedEx	03/14/19 Keith Lindner-->GLG	21.80
04/14/2019	FedEx	04/11/19 Debora Granja	22.61
05/05/2019	FedEx	04/25/19 Vera Vinicio	48.76
05/19/2019	FedEx	05/15/19 Leonel Tirado-->GLG	19.76
06/02/2019	FedEx	05/17/19	26.56
06/02/2019	FedEx	05/22/19	26.47
06/16/2019	FedEx	Miguel Samano	43.68
06/16/2019	FedEx	Chris Cornell	36.95
06/16/2019	FedEx	Viola Smith-Alexander	43.68
06/16/2019	FedEx	Dashianna Dilosa	41.97
06/16/2019	FedEx	Debora Granja-->GLG	124.90
06/16/2019	FedEx	Marshall Floyd	43.68
06/16/2019	FedEx	Megan Allen	48.70
06/16/2019	FedEx	Debora Granja	36.53
06/16/2019	FedEx	Leonel Tirado	23.43
06/16/2019	FedEx	John DeMartino-->GLG	75.13
07/15/2019	FedEx	07/09/19 GAM	25.35
08/04/2019	FedEx	07/15/19 Emma White	62.41
08/04/2019	FedEx	07/17/19 JJB in MN	94.70
09/01/2019	FedEx	08/19/19 - GLG-->JJB Jacksonville, FL	125.40
09/30/2019	Postage	Welcome/Doc Preservation	1.70
10/20/2019	FedEx	Mark Gomez	70.65
10/20/2019	FedEx	Keith Lindner	30.54
10/20/2019	FedEx	John and Yvonne DeMartino	41.75
10/20/2019	FedEx	Keith Lindner	21.93
10/20/2019	FedEx	Emma White	41.75
11/14/2019	Biltmore	JJB - Depo - Susan Crawford - Document shipping	20.00
11/19/2019	FedEx	Amanda Groves / K. K. Brinson	38.74
11/19/2019	FedEx	11/12/19 - GLG-->JJB Los Angeles CA	129.54
12/01/2019	FedEx	11/15/19 - JJB Los Angeles CA-->GLG	50.68
12/01/2019	FedEx	Sandra Campos-->GLG	23.09
12/01/2019	FedEx	Emma White	31.26
12/01/2019	FedEx	Alica Hernandez	31.26

Date	Name	Case Costs - Postage & Delivery	Amount
12/15/2019	FedEx	Sandra Campos	69.33
12/15/2019	FedEx	Charles Gomez-->GLG	17.32
12/15/2019	FedEx	Rafael Sanchez	30.90
12/15/2019	FedEx	Hortensia Torres	38.14
12/15/2019	FedEx	Jason Hewitt	31.21
12/15/2019	FedEx	Maria Nuno	38.14
12/15/2019	FedEx	Cathaline Gonzales	26.71
12/15/2019	FedEx	Elizabeth Messana	26.71
12/15/2019	FedEx	David Vance	33.42
12/15/2019	FedEx	Kevin Nesbitt	26.71
12/15/2019	FedEx	Ismael cedillos	38.14
12/15/2019	FedEx	Martha Montenegro	38.14
01/05/2020	FedEx	12/16/19 Scott Seymour	35.40
01/20/2020	FedEx	01/09/20 Michael Carrol	43.43
01/20/2020	FedEx	01/16/20 Marla F. Knox, Court Reporter	27.95
02/06/2020	Federal Express	Deposition of Peter Ross (Deposition copies)	165.10
		Total Postage & Delivery	<u>2,664.93</u>

Date	Name	Case Costs - Copies	Amount
12/05/2018	FedExOffice	Copy client documents	119.69
12/31/2018	Copy Charges	Dec 2018 Copy Charges @ .10 per page	113.60
01/31/2019	Copy Charges	Jan 2019 Copy Charges @ .10 per page	79.10
02/28/2019	Copy Charges	Feb 2019 Copy Charges @ .10 per page	51.10
03/31/2019	Copy Charges	Mar 2019 Copy Charges @ .10 per page	66.60
04/30/2019	Copy Charges	Apr 2019 Copy Charges @ .10 per page	20.90
05/31/2019	Copy Charges	May 2019 Copy Charges @ .10 per page	118.30
06/28/2019	Copies	Depos	381.72
06/30/2019	Copy Charges	Jun 2019 Copy Charges @ .10 per page	173.90
07/09/2019	FedEx	Robert Ferguson 30(b)(6) deposition	78.96
07/19/2019	FedExOffice	JJB - Depo - Diana Young	24.36
07/31/2019	Copy Charges	Jul 2019 Copy Charges @ .10 per page	896.70
08/21/2019	FedExOffice	JJB - Depo - Charlotte, NC	22.03
08/31/2019	Copy Charges	Aug 2019 Copy Charges @ .10 per page	263.40
09/30/2019	Copy Charges	Sep 2019 Copy Charges @ .10 per page	696.40
09/30/2019	Copies	Documents produced by Wells Fargo (hot docs)	366.42
10/31/2019	Copy Charges	Oct 2019 Copy Charges @ .10 per page	100.80
10/31/2019	Copies	color @.10/page	20.50
10/31/2019	Copies	color @.10/page	195.60
11/14/2019	UNIGUEST INC	JJB - Depo - Susan Crawford - Hotel computing services	7.62
11/30/2019	Copy Charges	Nov 2019 Copy Charges @ .10 per page	456.40
12/11/2019	FedEx	California class member depositions (general) (letters re representation at depositions)	29.61
12/31/2019	Copy Charges	Dec 2019 Copy Charges @ .10 per page	354.20
01/31/2020	Copy Charges	Jan 2020 Copies @ .20 per page	448.40
02/29/2020	Copy Charges	Feb 2020 Copies @ .20 per page	319.60
03/31/2020	Copy Charges	Mar 2020 Copies @ .20 per page	174.40
		Total Copies	<u>5,580.31</u>

Date	Name	Case Costs - Electronic Document Storage	Amount
07/22/2019	Everlaw	Electronic document storage	308.00
08/16/2019	Everlaw	Electronic document storage	450.00
09/05/2019	Everlaw	Electronic document storage	420.00
10/04/2019	Everlaw	Electronic document storage	450.00
11/06/2019	Everlaw	Electronic document storage	450.00
12/19/2019	Everlaw	Electronic document storage	600.00
02/05/2020	Everlaw	Electronic document storage	870.00
02/14/2020	Everlaw	Electronic document storage	870.00
03/09/2020	Everlaw	Electronic document storage	900.00
04/16/2020	Everlaw	Electronic document storage	870.00
05/05/2020	Everlaw	Electronic document storage	261.00
		Total Electronic Document Storage	<u>6,449.00</u>

Date	Name	Case Costs - Expert Witness Fees	Amount
12/06/2019	BHK Associates, Inc.	Initial retainer	7,500.00
01/10/2020	Dan Salah	Nov & Dec 2019	42,142.50
01/10/2020	BHK Associates	Expert report-Brian Kelley (review and preparation of report)	27,100.78
03/09/2020	BHK Associates	Responding to subpoena to Kelley/defending Kelley depo (depo and rebuttal report)	17,964.55
03/31/2020	BHK Associates	Expert report-Brian Kelley	1,803.49
03/31/2020	Dan Salah	Responding to subpoena to Salah/defending Salah depo (deposition testimony)	2,295.00
06/03/2020	Dan Salah	Jan 2020	11,610.00
06/03/2020	Dan Salah	Feb 2020	22,807.50
06/03/2020	BHK Associates, Inc.	Winston & Strawn	4,037.50
06/03/2020	Dan Salah	Mar 2020	1,935.00
		Total Experts	<u>139,196.32</u>

Date	Name	Case Costs - Claims Administrator	Amount
05/18/2020	Heffler Claims Admin LLC	Services through 03/27/20 - Inv 31122	<u>1,427.50</u>

Date	Name	Case Costs - Filing Fees	Amount
12/06/2018	US District Court - NDCA	Complaint	400.00
12/07/2018	Clerk of Court, WD Missouri	AGS Pro Hac Vice- Certificate of Good Standing	19.00
12/07/2018	Clerk of Court, WD Missouri	RMP Pro Hac Vice- Certificate of Good Standing	19.00
12/10/2018	Clerk of Court, ND California	AGS Pro Hac Vice	310.00
12/10/2018	Clerk of Court, ND California	RMP Pro Hac Vice	310.00
05/24/2019	Clerk of the Supreme Court, MO	LCF Pro Hac Vice (Certificate of Good Standing)	5.00
06/04/2019	Clerk of Court, ND California	LCF Pro Hac Vice	310.00
		Total Filing Fees	<u>1,373.00</u>

Date	Name	Case Costs - Research	Amount
11/27/2018	Westlaw	Oct 2018	63.79
11/30/2018	Westlaw	DCM Westlaw	4.69
12/31/2018	Westlaw		44.18
01/25/2019	Westlaw	Dec 2018	5,280.88
01/31/2019	Westlaw		101.37
02/28/2019	Westlaw	Jan 2019	3,930.70
02/28/2019	Westlaw		135.42
03/29/2019	Westlaw	Feb 2019	6,502.23
03/31/2019	Westlaw		75.91
04/29/2019	Westlaw	Mar 2019	651.80
04/30/2019	Westlaw		284.52
05/29/2019	Westlaw	Apr 2019	5,731.02
05/31/2019	Westlaw		134.10
06/01/2019	PACER	1st Qtr 2019	28.20
06/28/2019	Westlaw		15.76
07/01/2019	Westlaw	May 2019	591.02
07/31/2019	Westlaw		128.16
08/06/2019	Westlaw	Jun 2019	733.78
08/30/2019	Westlaw		747.16
09/03/2019	Westlaw	Jul 2019	672.44
09/30/2019	Westlaw		231.56
10/07/2019	Westlaw	Aug 2019	827.74
10/31/2019	Westlaw		292.01
10/31/2019	Westlaw		406.17
11/01/2019	Westlaw	Sep 2019	2,055.65
11/06/2019	PACER	3rd Qtr 2019	42.30
12/03/2019	Westlaw	Oct 2019	4,755.77
12/27/2019	Westlaw	Nov 2019	6,518.06
12/31/2019	Westlaw		109.53
01/28/2020	Westlaw	Dec 2019	2,819.45
01/31/2020	PACER	4th Qtr 2019	50.60
01/31/2020	Westlaw		670.71
02/28/2020	Westlaw		498.23
02/29/2020	Westlaw	Jan 2020	2,058.12
03/31/2020	Westlaw	Feb 2020	1,892.11
03/31/2020	Westlaw		469.58
04/30/2020	Westlaw	Mar 2020	2,972.60
04/30/2020	Westlaw		164.86
05/07/2020	PACER	1st Qtr 2020	76.40
05/31/2020	Westlaw	Apr 2020	157.43
05/31/2020	Westlaw		62.08
Total Research			52,988.09

Date	Name	Case Costs - Transcripts	Amount
01/04/2019	Ana M. Dub, CSR 7445	01/03/19	181.25
03/05/2019	Raynee H. Mercado, CSR	Transcript	24.30
04/24/2019	MK Litigation Solutions, Inc.	Transcript	38.80
05/30/2019	Debra L. Pas, CRR	Transcript	127.50
07/08/2019	Debra L. Pas, CRR	Transcript	16.80
07/16/2019	Ana M. Dub, CSR 7445	07/03/19	17.10
07/24/2019	LNS Court Reporting	Robert Ferguson 30(b)(6) deposition	1,307.75
07/31/2019	Esquire Deposition Solutions	Alicia Hernandez	938.60
07/31/2019	Esquire Deposition Solutions	Russell Simoneaux	506.65
07/31/2019	Esquire Deposition Solutions	Yvonne DeMartino	582.80
07/31/2019	Esquire Deposition Solutions	Tiffanie Hood	1,296.80
07/31/2019	Esquire Deposition Solutions	John DeMartino	1,078.55
07/31/2019	Esquire Deposition Solutions	Rose P. Wilson	1,142.45
07/31/2019	Esquire Deposition Solutions	Coszetta Teague	1,385.20
07/31/2019	Esquire Deposition Solutions	Keith R. Lindner	947.60
08/05/2019	Esquire Deposition Solutions	Depositions of George and Cyndi Floyd	1,686.20
08/16/2019	Esquire Deposition Solutions	Deposition of Troy Frye	822.35
08/30/2019	Esquire Deposition Solutions	Diana P. Trevino	1,133.15
09/05/2019	Esquire Deposition Solutions	Deposition of Debora Granja	1,051.25
09/17/2019	Esquire Deposition Solutions	Deposition of Brenda Simoneaux	887.10
11/13/2019	Esquire Deposition Solutions	Emma Lee White	1,193.20
11/13/2019	Veritext Corp	07/19/19 - Diane M. Young (video)	1,691.25
11/13/2019	Veritext Corp	07/19/19 - Diane M. Young	2,150.15
11/13/2019	Veritext Corp	08/02/19 - Carmen Bell	4,774.35
11/13/2019	Veritext Corp	08/02/19 - Carmen Bell (video)	2,319.25
11/13/2019	Veritext Corp	08/21/19 - Beena Menon	1,977.05
11/13/2019	Veritext Corp	08/21/19 - Beena Menon (video)	1,542.75
12/06/2019	Esquire Deposition Solutions	06/12/19 - Brenda Simoneaux	757.20
12/31/2019	Veritext Corp	11/14/19 - Daniel Pfeil and Susan Crawford	3,214.35
12/31/2019	Veritext Corp	11/14/19 - Daniel Pfeil and Susan Crawford - Videos	2,237.75
01/16/2020	MK Litigation Solutions, Inc.	USDC-CA-N 01/16/20	248.05
01/17/2020	Esquire Deposition Solutions	Deposition of Jameel Hayden (transcript)	1,572.80
01/17/2020	Esquire Deposition Solutions	Deposition of Sandra Campos	1,594.25
01/17/2020	Huney-Vaughn Court Reporters	Deposition of Kara Reimers	1,956.73
01/22/2020	MK Litigation Solutions, Inc.	USDC-CA-N 01/16/20	18.15
02/05/2020	Anna Schulke	Deposition of Anna Schulke (reimbursement for client expenses to attend deposition)	153.22
02/19/2020	Esquire Deposition Solutions	Deposit	(125.55)
02/27/2020	Esquire Deposition Solutions	Dan Salah	1,555.35
02/27/2020	Esquire Deposition Solutions	Brian Kelley	2,340.40
03/09/2020	Esquire Deposition Solutions	Deposition of Anna Schulke	938.70
03/19/2020	Veritext Corp	01/23/20 Christopher James	1,859.00
03/19/2020	Veritext Corp	01/23/20 Christopher James - Video	1,082.75
03/19/2020	Veritext Corp	02/06/20 Peter M. Ross	1,940.45
03/19/2020	Veritext Corp	02/06/20 Peter M. Ross - Video	1,196.25
04/16/2020	Esquire Deposition Solutions	Deposition Derrick Cannon	2,113.26
04/20/2020	Ana M. Dub, CSR 7445	04/16/20	14.40
Total Transcripts			55,487.71

EXHIBIT D

Firm Resume

Gibbs Law Group is a national litigation firm representing plaintiffs in class and collective actions in state and federal courts, and in arbitration matters worldwide. The firm serves clients in consumer protection, securities and financial fraud, antitrust, whistleblower, personal injury, and employment cases. We are committed to achieving favorable results for all of our clients in the most expeditious and economical manner possible.

The firm regularly prosecutes multi-state class actions and has one of the best track records in the country when it comes to successfully certifying classes, developing practical damages methodologies, obtaining prompt relief for class members victimized by unlawful practices, and working cooperatively with other firms.

Our attorneys take pride in their ability to simplify complex issues; willingness to pursue narrow and innovative legal theories; ability to work cooperatively with other plaintiffs' firms; and desire to outwork and outlast well-funded defense teams.

As a result, our firm and attorneys are frequently recognized by the courts, our peers, and the legal media for the quality of their work:

- Class Action Practice Group of the Year, *Law360*, 2019
- Top Boutique Law Firms in California, *Daily Journal*, 2019
- Titans of the Plaintiffs Bar, *Law360*, 2019 (Eric Gibbs)
- Two 2019 California Lawyer Attorney of the Year (CLAY) Awards
- Top Plaintiff Lawyers in California, *Daily Journal*, 2019 and 2016 (Eric Gibbs)
- Cybersecurity and Privacy MVP, *Law360*, 2018 (Eric Gibbs)
- Consumer Protection MVP, *Law360*, 2016 (Eric Gibbs) (sole plaintiffs' lawyer recognized)
- Top Cybersecurity/ Privacy Attorneys Under 40, *Law360 Rising Stars*, 2017 (Andre Mura)
- Top Class Action Attorneys Under 40, *Law360 Rising Stars*, 2017 (David Stein)
- Top 40 Lawyers Under 40, *Daily Journal*, 2017 (David Stein)
- AV-Preeminent, *Martindale-Hubbell* (Eric Gibbs)
- Best Lawyers in America for Class Action and Mass Torts
- 17 of our attorneys have been recognized as Northern California *Super Lawyers* or *Rising Stars*.

ATTORNEYS

Partners

<i>Eric Gibbs</i>	<i>p. 2</i>
<i>David Berger</i>	<i>p. 4</i>
<i>Dylan Hughes</i>	<i>p. 5</i>
<i>Karen Barth Menzies</i>	<i>p. 6</i>
<i>Geoffrey Munroe</i>	<i>p. 8</i>
<i>Andre Mura</i>	<i>p. 9</i>
<i>Michael Schrag</i>	<i>p. 11</i>
<i>David Stein</i>	<i>p. 13</i>
<i>Steven Tindall</i>	<i>p. 15</i>
<i>Amy Zeman</i>	<i>p. 16</i>

Of Counsel

<i>A.J. De Bartolomeo</i>	<i>p. 18</i>
<i>John Kehoe</i>	<i>p. 20</i>
<i>Robert Mosier</i>	<i>p. 21</i>
<i>George Sampson</i>	<i>p. 22</i>
<i>Michael Yarnoff</i>	<i>p. 23</i>

Associates/ Staff Attorneys

<i>Joshua Bloomfield</i>	<i>p. 24</i>
<i>Aaron Blumenthal</i>	<i>p. 24</i>
<i>Kyla Gibboney</i>	<i>p. 24</i>
<i>Amanda Karl</i>	<i>p. 24</i>
<i>Jeffrey Kosbie</i>	<i>p. 25</i>
<i>Linda Lam</i>	<i>p. 25</i>
<i>Steve Lopez</i>	<i>p. 25</i>
<i>Nikul Shah</i>	<i>p. 25</i>

SIGNIFICANT RECOVERIES

<i>Antitrust & Unfair Business Practices</i>	<i>p. 26</i>
<i>Securities & Financial Fraud</i>	<i>p. 28</i>
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<i>Government Reform</i>	<i>p. 34</i>

Partners



Eric H. Gibbs | Partner

Eric Gibbs prosecutes antitrust, consumer protection, whistleblower, financial fraud and mass tort matters. He has been appointed to leadership positions in dozens of contested, high profile class actions and coordinated proceedings. Eric has recovered billions of dollars for the clients and classes he represents and has negotiated groundbreaking settlements that resulted in meaningful reforms to business practices and have favorably impacted plaintiffs' legal rights.

Reputation and Recognition by the Courts

In over 20 years of practice, Eric has developed a distinguished reputation with his peers and the judiciary for his ability to work efficiently and cooperatively with co-counsel, and professionally with opposing counsel in class action litigation.

"[Mr. Gibbs] efficiently managed the requests from well over 20 different law firms and effectively represented the interests of Non-Settling Plaintiffs throughout this litigation."

- Hon. G. Wu, *In re Hyundai & Kia Fuel Economy Litig.* (C.D. Cal)

"The attorneys who handled the case were particularly skilled by virtue of their ability and experience."

- Hon. D. Debevoise, *In re: Mercedes-Benz Teleaid Contract Litig.* (D. N.J.)

"They are experienced and knowledgeable counsel and have significant breadth of experience in terms of consumer class actions."

- Hon. R. Sabraw, *Mitchell v. Am. Fair Credit Assoc'n* (Alameda Cty. Superior Ct.)

"Representation was professional and competent; in the Court's opinion, counsel obtained an excellent result for the class."

- Hon. J. Fogel, *Sugarman v. Ducati N. Am.* (N.D. Cal)

Achievements and Leadership

Eric has been recognized as a leading lawyer in class and mass actions. In 2019, *Law360* recognized Eric among its "Titans of the Plaintiffs Bar," one of only 10 attorneys nationwide to receive the prestigious award. He also received the 2019 *California Lawyer Attorney of the Year (CLAY) Award* for his work in the Anthem Data Breach Litigation. *Daily Journal* named him to its coveted list of "Top Plaintiff Lawyers in California" for 2019 and 2016. *Law360* recognized Eric as a "2016 Consumer Protection MVP," (the only plaintiff-side lawyer in the country selected in that category) and as a "2018 Cybersecurity & Privacy MVP." Consumer Attorneys of California selected Eric and co-counsel as finalists for *Consumer Attorney of the Year* for achieving a \$100 million settlement in the Chase "Check Loan" Litigation. His cases have been chronicled in major legal and news publications including *NBC News*, *CNN*, the *National Law Journal*, *The New York Times*, *Market Watch*, and *Bloomberg News*. Eric holds a variety of leadership positions in professional associations for consumer advocacy, and he frequently presents on developing trends in the law at conferences throughout the country.

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Practice Emphasis

Antitrust & Unfair Competition
Banking and Financial Fraud
Class Actions
Consumer Protection
Mass Personal Injury
Whistleblower

Education

Seattle University School of
Law, J.D., 1995
San Francisco State
University, B.A., 1991

Awards & Honors

Titans of the Plaintiffs Bar,
Law 360, 2019
*California Lawyer Attorney of
the Year Award*, 2019
*Top Plaintiff Lawyers in
California for 2019, 2016*,
Daily Journal
*Lawdragon 500 Leading
Plaintiff Consumer Lawyer*,
2019
*Cybersecurity & Privacy
MVP*, Law 360, 2018
Consumer Protection MVP,
Law 360, 2016
*Best Lawyers in America for
Class Actions/ Mass Tort
Litigation (2012-2019)*
AV Preeminent® Peer
Review Rated by Martindale-
Hubbell
*Top 100 Super Lawyers in
Northern California*

Admissions

California

Litigation Highlights

In re Anthem, Inc. Data Breach Privacy Litigation – Served as a court-appointed member of the Plaintiffs’ Steering Committee representing the interests of plaintiffs and putative class members following a massive data breach of approximately 80 million personal records. The lawsuit settled in August 2018 for \$115 million, the largest data breach settlement in history at the time.

In re Chase Bank U.S.A., N.A. “Check Loan” Contract Litigation – multidistrict litigation that alleged Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. Eric led negotiations in the case, which resulted in a \$100 million settlement with Chase eight weeks prior to trial.

In re Adobe Systems Inc. Privacy Litigation – As court-appointed lead counsel, Eric and his team reversed a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41 page decision in plaintiffs’ favor and Eric negotiated a comprehensive reform of Adobe’s data security practices. The court’s landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

In re Hyundai & Kia Fuel Econ. Litigation – As court-appointed liaison counsel, Eric reconciled the plaintiffs’ interests and coordinated discovery and settlement negotiations. He helped finalize a settlement with an estimated value of up to \$360 million.

Skold v. Intel Corp. – After more than a decade of litigation, Eric as lead counsel achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel’s benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

Parkinson v. Hyundai Motor America – Eric served as class counsel in this lawsuit alleging that the flywheel and clutch system in certain Hyundai vehicles was defective. After achieving nationwide class certification, Hyundai agreed to a settlement that provided for 50-100% reimbursements to class members for their repairs and full reimbursement for rental vehicle expenses.

De La Cruz v. Masco Retail Cabinet Group – Eric served as lead attorney litigating the collective claims of dozens of misclassified account representatives for overtime pay under the Fair Labor Standards Act (FLSA). Successfully certified a class of current and former Masco account representatives and personally arbitrated the case to judgment obtaining full recovery for the class.

In re Providian Credit Card Cases – Eric played a prominent role in this nationwide class action suit brought on behalf of Providian credit card holders alleging that Providian engaged in unlawful and fraudulent business practices in connection with the marketing and fee assessments for its credit cards. The Honorable Stuart Pollack approved a \$105 million settlement, plus injunctive relief—one of the largest class action recoveries in the United States arising out of consumer credit card litigation.

Professional Affiliations

American Association for Justice
American Bar Foundation- Fellow
Consumer Attorneys of California
National Association of Consumer Advocates
Pound Civil Justice Institute- Fellow
Public Justice Foundation- Class Action Preservation Project Committee



David M. Berger | Partner

David Berger represents plaintiffs in class actions with a special emphasis on data breach, privacy, and health care litigation. Mr. Berger has represented plaintiffs in complex lawsuits following some of the nation's largest retail and healthcare data breaches, including litigation against Adobe, Anthem, Home Depot, Experian, and Excellus BlueCross BlueShield, among others. Prior to joining Gibbs Law Group, Mr. Berger was a law clerk in the Northern District of California, litigation counsel for the Economic Community of West African States, and an associate at Robins, Kaplan, Miller, and Ciresi.

Representative Work

In re Anthem, Inc. Data Breach Privacy Litigation – Key member of the litigation team representing interests of plaintiffs and putative class members following massive data breach of approximately 80 million personal records, including names, dates of birth, Social Security numbers, health care ID numbers, email and physical addresses, employment information, and income data. The lawsuit settled in August 2018 for \$115 million, the largest data breach settlement in history.

Fero v. Excellus Health Plan Inc. – Key member of the litigation team representing the interests of 7 million Excellus health plan subscribers and 3.5 million Lifetime subscribers whose personal and medical information was compromised.

In re Adobe Systems Inc. Privacy Litigation – Key member of the litigation team that succeeded in reversing a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41-page decision in plaintiffs' favor and the settlement resulted in a comprehensive reform of Adobe's data security practices. The court's landmark decision on Article III standing marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

Awards & Honors

Certified Information Privacy Technologist, International Association of Privacy Professionals (IAPP)

Named a Northern California "Rising Star" by Super Lawyers (2016- 2018)

Professional Affiliations

American Association for Justice
Consumer Attorneys of California

Presentations and Publications

Presenter, "Communicating with the Class," Class Action Mastery Forum, January 2019.

Presenter, "Hot Topics in Consumer Class Actions Against Insurers: Filed Rate Doctrine, Standing, and Reverse Preemption of RICO Claims," Sacramento California Insurance Regulation and Litigation Seminar, Clyde & Co., March 2018.

Presenter, "Winning strategies in privacy and data security class actions: the plaintiffs' perspective," Berkeley Center for Law & Technology, Berkeley Law School, January 2017.

Presenter, "Don't be Spokeo'd: What You Need to Know in Litigating Data Breach Cases (from breach to remedies)," ABA Business Law Section Annual Meeting, September 8, 2016.

Presenter, "Developments in 'E-Commerce' Class Actions and Privacy Law," Perrin Class Action Litigation Conference, May 16, 2016.

Presenter, "Data Breach Class Action Litigation," Mass Torts Made Perfect Conference, April 22, 2016.

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Practice Emphasis

Class Actions

Consumer Protection

Privacy

Education

J.D., Northwestern University

School of Law, 2008

B.A., University of Wisconsin,

Madison, 1998

Admissions

California



Dylan Hughes | Partner

Dylan Hughes concentrates his practice on investigating and prosecuting fraud matters on behalf of whistleblowers, consumers and employees who have been harmed by corporate misconduct. He coordinates initial case evaluations and analyses in a variety of practice areas and has substantial experience in matters involving health care fraud, particularly in the Medicare and pharmaceutical contexts. Dylan represents consumers in cases ranging from false advertising to defective products, and employees in misclassification and wage and hour cases under state and federal laws.

Mr. Hughes has extensive experience prosecuting complex personal injury cases. He helped to obtain millions of dollars for women who suffered blood clots and other serious injuries after taking birth control pills. He has also represented clients injured by defective medical devices, including defibrillators, blood filters, as well as back pain implants. Mr. Hughes was part of the team that recently settled a case alleging medical malpractice for a spinal surgery that resulted in partial paralysis.

Mr. Hughes began his career as a law clerk for the Honorable Paul A. Mapes, Administrative Law Judge of the Office of Administrative Law Judges, United States Department of Labor. He is a member of the American Bar Association, Consumer Attorneys of California, American Association for Justice Class Action Litigation Group and the Consumer Rights Section of the Barristers Club.

Litigation Highlights

Skold v. Intel Corp. – Key member of the legal team in this decade-long litigation that achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel’s benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

In re Adobe Systems Inc. Privacy Litigation – Key member of the litigation team that succeeded in reversing a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41-page decision in plaintiffs’ favor and the settlement resulted in a comprehensive reform of Adobe’s data security practices. The court’s landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

Velasco v. Chrysler Group LLP – represented consumers who alleged they were sold and leased vehicles with defective power control modules that caused vehicle stalling. In addition to negotiating a recall of all 2012-13 Jeep Grand Cherokee and Dodge Durango vehicles, the lawsuit also resulted in Chrysler reimbursing owners for all repair and rental car expenses, and extending its warranty.

Parkinson v. Hyundai Motor America – certified a nationwide class alleging Hyundai sold vehicles with defective flywheel systems, resulting in a favorable settlement for the class.

Awards & Honors

Northern California Super Lawyer (2012-2019)

Professional Affiliations

Consumer Attorneys of California
American Association for Justice- Class Action Litigation Group

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Practice Emphasis

Class Actions
Consumer Protection
Employment Law
Whistleblower

Education

University of California,
Hastings College of Law, J.D.,
2000

University of California at
Berkeley, B.A., 1995

Admissions

California



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Practice Emphasis

Class Actions
Mass Personal Injury

Education

University of California, Davis
King Hall School of Law, J.D.,
1995.

Colorado State University,
B.A., 1989.

Admissions

California

Karen Barth Menzies | Partner

Karen is a nationally recognized mass tort attorney with more than twenty years of experience in federal and state litigation. Courts throughout the country have appointed Karen to serve in leadership positions including Lead Counsel, Liaison Counsel and Plaintiff Steering Committee in some of the largest pharmaceutical and device mass tort cases. Karen currently serves in leadership positions in the Zoloft Birth Defect Litigation (federal and California state courts), Transvaginal Mesh Litigation (federal and California state courts), Fosamax Femur Fracture Litigation (California state court), Lexapro/Celexa Birth Defect Litigation (Missouri state court).

Karen is particularly focused on women's health issues and drugs that cause harm to children. She currently serves as co-lead counsel in the *In re Taxotere (Docetaxel) Products Liability Litigation*, a consolidated multi-district proceeding on behalf of women who suffered permanent, disfiguring hair loss following breast cancer chemotherapy treatments. Karen believes in advocating for drug safety and for the victims in the face of profit-driven corporations. She has testified twice before FDA advisory boards as well as the California State Legislature on the safety concerns regarding the SSRI antidepressants and the manufacturers' misconduct.

Karen frequently publishes and presents on issues involving drug safety, mass tort litigation, FDA reform and federal preemption for both legal organizations (plaintiff and defense) and medical groups.

Awards & Honors

AV Preeminent® Peer Review Rated by Martindale-Hubbell
Southern California Super Lawyer (2004-2019)
Lawyer of the Year by *Lanier's Weekly USA* (2004)
California Lawyer of the Year by *California Lanier* magazine (2005)
Consumer Attorney of the Year Finalist by CAOC (2006)

Professional Affiliations

American Association for Justice, Co-Chair, Taxotere Litigation Group
Consumer Attorneys of California
Consumer Attorneys of Los Angeles
American Bar Association (appointed member of the Plaintiffs' Task Force)
Women En Mass
The Sedona Conference (WG1, Electronic Document Retention and Production)
The National Trial Lawyers
National Women Trial Lawyers Association
LA County Bar Association
Women Lawyers Association of Los Angeles
Public Justice

Select Publications & Presentations

Author, "Prepping for the Prescriber Deposition," Trial Magazine, American Association for Justice, January 2020.

Presenter, "Deposing the Treating/ Prescribing Physician, Learned Intermediary, the One Potentially Fatal Fact Witness," American Association for Justice Convention: Discovery and Litigation Strategies for Drug and Device Cases, February 2019.

Presenter, “A Funny Thing Did Happen on the Way to the Forum: Navigating the New Landscape of Personal Jurisdiction Challenges,” ABA Section of Litigation 2019 Environmental & Energy, Mass Torts, and Products Liability Litigation Committees’ Joint CLE Seminar, March 2018.

Presenter, “Federal and State Court Coordination of Mass Tort Litigation: Navigating State Court vs. Multidistrict Litigation, Mass Torts Made Perfect Conference, October 2018.

Presenter, “Taxotere Litigation: Federal MDL 2740, New Orleans and State Court Jurisdictions, Mass Torts Made Perfect Conference, October 2018.

Presenter, “505(b)(2) Defendants – The Non-Generic Alternative; Social Media and Support Groups; Settlement Committees,” AAJ Section on Torts, Environmental and Product Liability (STEP): On the Cutting Edge of Torts Litigation, July 2018.

Presenter, “Location, Location, Location Part II: State Court Consolidations,” AAJ Mass Torts Best Practices Seminar, July 2017.

Presenter, “Personal Jurisdiction in Mass Torts and Class Actions: Bristol-Myers Squibb Co. v. Superior Court (Cal. 2016),” Mass Torts Judicial Forum with Judge Corodemus and JAMS, April 2017.

Author, “Bringing the Remote Office Closer,” Trial Magazine, American Association for Justice, March 2017.



Geoffrey Munroe | Partner

Geoffrey Munroe represents plaintiffs in high-profile class action and mass tort cases in both federal and state courts throughout the United States. He was selected as a Rising Star by Northern California Super Lawyers (2010-2014), recognizing him as one of the best young attorneys practicing in Northern California, and as a Northern California Super Lawyer in 2015. He is the co-author of "*Consumer Class Actions in the Wake of Daugherty v. American Honda Motor Company*," CAOC's Forum Magazine, January/February 2009, and a frequent contributor to the Class Action Litigation Group Newsletter of the American Association for Justice.

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Practice Emphasis

Class Actions
Consumer Protection
Mass Personal Injury
Whistleblower

Education

University of California,
Berkeley School of Law, J.D.,
2003

University of California at
Berkeley, B.A., 2000

Admissions

California

Mr. Munroe is a 2003 graduate of the University of California at Berkeley School of Law (Berkeley Law), where he was the recipient of the American Jurisprudence Award in Torts, Business Law & Policy and Computer Law. He received his undergraduate degree in chemistry from the University of California at Berkeley in 2000. Mr. Munroe is a member of the Public Justice Class Action Preservation Project Committee, the Class Action Litigation Group of the American Association for Justice and the Consumer Attorneys of California. He is a member of the California Bar and is admitted to practice before the United States Court of Appeals for the Ninth Circuit, as well as the United States District Courts for the Northern, Central and Southern Districts of California.

Litigation Highlights

Skold v. Intel Corp. – Key member of the briefing team in this decade-long litigation that achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel's benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

In re Chase Bank U.S.A., N.A. "Check Loan" Contract Litigation – Key member of the litigation team in this multidistrict case alleging that Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. The litigation resulted in a \$100 million settlement with Chase eight weeks prior to trial.

In re Mercedes-Benz Tele Aid Contract Litigation – Key member of the litigation team in this multi-district litigation alleging that Mercedes-Benz failed to disclose to its customers that the "Tele Aid" equipment installed in their vehicles would soon be obsolete and require an expensive replacement to keep working. Resulted in a class settlement providing for cash reimbursements of \$650, or new vehicle credits for up to \$1,300.

Parkinson v. Hyundai Motor America – key member of the briefing team that achieved certification of a nationwide class alleging Hyundai sold vehicles with defective flywheel systems, before ultimately reaching a favorable settlement for the class.

Awards & Honors

Northern California Super Lawyers (2015-2019)
Northern California Super Lawyers, *Rising Star* (2010 - 2014)

Professional Affiliations

Consumer Attorneys of California
American Association for Justice- Class Action Litigation Group
Public Justice- Class Action Preservation Project



Andre M. Mura | Partner

Andre M. Mura represents plaintiffs in class action and complex litigation concerning consumers' and workers' rights, products liability, drug and medical devices, federal jurisdiction, and constitutional law. Before joining Gibbs Law Group, Andre was senior litigation counsel at the Center for Constitutional Litigation PC, where he represented plaintiffs in high-stakes appeals and complex litigation in state supreme courts and federal appellate courts.

Andre received a 2019 California Lawyer Attorney of the Year Award for his work before the California Supreme Court in *De La Torre v. CashCall*. He is on the Board of the Civil Justice Research Initiative of Berkeley Law and UC Irvine School of Law, a Fellow of the American Bar Foundation, a member of the Lawyers Committee of the National Center for State Courts, a Trustee of the Pound Civil Justice Institute, and Chair of the American Association for Justice's LGBT Caucus.

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amm@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Constitutional Law
Employment Law
Mass Personal Injury

Education

The George Washington
University Law School, J.D.,
2004

Williams College, B.A., 2000

Admissions

California
District of Columbia

Awards & Honors

*California Lawyer Attorney of
the Year (CLAY) Award, 2019*

*Top Cybersecurity & Privacy
Attorneys Under 40, Law360
Rising Stars (2017)*

*Northern California Super
Lawyers Rising Star (2016-
2019)*

Litigation Highlights

In re: 3M Combat Arms Earplug Products Liability Litigation – This multi-district litigation concerns allegations that 3M's dual-ended Combat Arms earplugs were defective and caused servicemembers and civilians to develop hearing loss or tinnitus. A four-member panel appointed Andre to the Law, Briefing, and Legal Drafting Committee after reviewing nearly 200 applications from attorneys across the country and listening to 64 presentations over a 2-day period. The lawsuit is ongoing.

In re: Taxotere (Docetaxel) Products Liability Litigation – Andre was a member of the trial team in a two-week federal jury trial and was selected as chair of plaintiffs' law and briefing committee in this multi-district litigation on behalf of breast cancer survivors who suffered permanent, disfiguring hair loss after using the Taxotere chemotherapy drug. The lawsuit is ongoing.

In re: Vizio, Inc. Consumer Privacy Litigation – Andre is co-lead counsel for the settlement class in this multi-district lawsuit alleging that Vizio collected and sold data about consumers' television viewing habits and their digital identities to advertisers without consumers' knowledge or consent. He negotiated a settlement providing for class-wide injunctive relief transforming the company's data collection practices, as well as a \$17 million fund to compensate consumers who were affected.

In re: Taxotere (Docetaxel) Products Liability Litigation - Andre was selected to chair the plaintiffs' law and briefing committee in this multi-district litigation on behalf of breast cancer survivors who suffered permanent, disfiguring hair loss after using the Taxotere chemotherapy drug. The lawsuit is ongoing.

De La Torre v. CashCall - Andre played a key role in briefing before the California Supreme Court, resulting in a unanimous decision in the plaintiffs' favor. The decision changed decades-old assumptions that lenders in California had a virtual "safe harbor" from unconscionability challenges to loan interest rate terms.

In re: Lenovo Adware Litigation - Andre successfully briefed and argued a motion to dismiss and motion to certify a nationwide litigation class for monetary damages. The court approved a \$7.3 million class action settlement to resolve allegations that Lenovo preinstalled software on laptops that caused performance, privacy and security issues for consumers.

Watts v. Lester E. Cox Medical Centers, 376 S.W.3d 633 (Mo. 2012) Andre successfully argued that a state law limiting compensatory damages in medical malpractice cases violated his client's right to trial by jury. In ruling for Andre's client, the Missouri high court agreed to overturn a 20-year-old precedent.

J. McIntyre Machinery, Ltd. v. Nicastro, 131 S. Ct. 2780 (2011) Andre was a lead author of merits briefing addressing whether personal jurisdiction exists over a foreign manufacturer.

Beaver et. al. v. Tarsadia Hotels, Inc. et. al. – Andre contributed to briefing before the Ninth Circuit Court of Appeals resulting in a unanimous decision affirming the lower court’s ruling that the UCL’s four-year statute of limitations (and its accrual rule) applied in claims alleging violations of the Interstate Land Sales Full Disclosure Act (ILSA) even though ILSA has a shorter statute of limitations.

Corber v. Xanodyne Pharmaceuticals - Andre represented plaintiffs injured by propoxyphene, an ingredient found in Darvocet and Darvon pain relief drugs and generic pain relievers, before the U.S. Court of Appeals for the Ninth Circuit, sitting en banc.

Texaco, Inc. & Chevron Corp. v. Simon, Andre argued before the Mississippi Supreme Court in a case concerning Texaco’s and Chevron’s liability for pregnant women’s exposure to leaded gas. The case settled favorably after oral argument but before decision.

Mutual Pharmaceutical Co., Inc. v. Bartlett, 133 S. Ct. 2466 (2013), Andre was the lead author of an amicus curiae brief for the American Association for Justice and Public Justice in case examining whether federal drug safety law preempts state-law liability for defectively designed generic drugs.

Qwest Services Corp. v. Blood, 132 S. Ct. 1087 (2012), Andre was counsel of record for plaintiffs in opposing Supreme Court review of an \$18 million punitive damages award.

Awards & Honors

California Lawyer Attorney of the Year (CLAY) Award (2019)

Top Cybersecurity & Privacy Attorneys Under 40, *Law360* Rising Stars (2017)

Northern California Super Lawyers *Rising Star* (2016-2019)

Select Publications & Presentations

Author, “Staying on Track After Bristol-Myers,” *Trial Magazine*, American Association for Justice, April 2019.

Presenter, “Personal Jurisdiction, Choice of Law & Hyundai,” *Class Action Mastery Forum*, January 2019.

Presenter, “Jurisdictional Issues Post Bristol-Myers,” *Bridgeport 2018 Class Action Litigation Conference*, September 2018.

Panelist, “State Court Protection of Individual Constitutional Rights,” *Pound Civil Justice Institute 2018 Forum for State Appellate Court Judges*, July 2018.

Co-author, “Supreme Court Applied 'Settled Principles' In BMS Ruling,” *Law360 Expert Analysis*, September 11, 2017

Co-author, “In the Breach,” *Trial Magazine*, American Association for Justice, September 2017.

Co-author, “Supreme Court Puts Personal Jurisdiction on Trial,” *Law360*, May 22, 2017.

Co-Author, “Beware Intended Consequences of Class Action Reform, Too,” *Law360*, March 14, 2017.

Author, *Buckman Stops Here! Limits on Preemption of State Tort Claims Involving Allegations of Fraud on the PTO or the FDA*, 41 *Rutgers L.J.* 309, 2010.



Michael Schrag | Partner

Michael Schrag has over 20 years of experience representing individual and small business plaintiffs in a broad range of complex class actions against large corporations in the banking, credit card, telecommunications, and real estate sectors. He has successfully litigated antitrust, securities, product liability, personal injury, medical malpractice, employment, and contingent breach of contract cases. He currently serves on the Plaintiffs' Executive Committee in the *In Re Cattle Antitrust Litigation*, on the Plaintiffs Steering Committee in the *In re: Wells Fargo Collateral Protection Insurance Litigation* and on the Expert Committee in the *In re: Disposable Contact Lens Antitrust Litigation*. He is also prosecuting "no-poach" wage suppression antitrust class actions against Burger King and Jiffy Lube and another class action against Wells Fargo for wrongfully denying over 870 borrowers loan modifications that caused many to lose their homes to foreclosure.

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Practice Emphasis

Antitrust
Class Actions
Consumer Protection
Mass Personal Injury
Securities and Financial Fraud
Whistleblower

Education

University of California,
Berkeley School of Law, J.D.,
1996

Columbia College at Columbia
University, B.A., 1989

Admissions

California

Awards & Honors

*Northern California Super
Lawyers*, 2019.

Michael served as Co-Lead counsel in *Beaver v. Tarsadia Hotels*, an unfair competition class action against real estate developers, which recently settled for \$51.15 million. He currently represents over 300 purchasers of fractional interests in luxury condominiums in breach of fiduciary duty and contract cases against Marriott and Starwood.

He also recently settled (for confidential sums) three related actions in California and Florida on behalf of small business owners alleging RICO and fraud claims against American General Insurance Company, a subsidiary of AIG. Michael previously represented a class of small business owners in a breach of contract case against an AT&T subsidiary that resulted in a \$27 million judgment. Early in his career, Michael helped initiate and prosecute class actions against Visa, MasterCard, and major U.S. banks for failing to disclose and fixing the price of currency conversion fees. These cases settled for \$336 million.

Michael is a 1996 graduate of the University of California at Berkeley School of Law (Berkeley Law) and received his undergraduate degree in 1989 from Columbia College at Columbia University. He began his career prosecuting securities class actions and serving as a law clerk to the Honorable Judith N. Keep, U.S. District Judge, Southern District of California.

Litigation Highlights

In re: Wells Fargo Collateral Protection Insurance Litigation- Michael served on the court-appointed, three-firm Plaintiffs' Steering Committee in this multi-district litigation on behalf of consumers who took out car loans from Wells Fargo and were charged for auto insurance they did not need. The parties announced a proposed settlement of at least \$393.5 million for affected consumers and the Court granted preliminary approval in August 2019. Final approval is pending.

In re: Disposable Contact Lens Antitrust Litigation-(MDL No. 2626) Michael is currently a member of the expert committee in this antitrust class action challenging the minimum resale pricing policies of the dominant disposable contact lens manufacturers. After a two-day hearing the Court certified the class and trial is set for January 2020

Beaver v. Tarsadia Hotels- Michael served as co-lead counsel on behalf of consumers in this unfair competition class action against real estate developers selling hotel-condominium units. Lawsuit alleged that sellers concealed certain Congressionally-mandated protections in the sales contracts, including a statutory rescission right. After six years of litigation including a win in the Ninth Circuit that established favorable law for consumers, the lawsuit settled for \$51.15 million. In granting final approval, Judge Curiel concluded that the settlement was "an excellent result," and noted "Class Counsel overcame several hurdles that reflect their skill and experience." *Beaver v. Tarsadia Hotels*, 816 F. 3d1170 (9th Cir. 2016)

In re Currency Conversion Fee Antitrust Litigation (MDL No. 1409)– This action alleged that Visa, MasterCard and their then member banks, including Bank of America and Chase, fixed the price of foreign currency conversion fees on international credit and debit card transactions. Michael was part of the team that prevailed at trial in a related state court action, and then obtained a \$336 million global settlement for the class in this multidistrict antitrust litigation against the country’s largest credit card issuers and networks.

Asokan et. al. v. American General Ins. Co.- Member of the trial team in this insurance and investment fraud case against American General Insurance Co, an AIG subsidiary. Michael and his team represented six plaintiffs who were marketed an investment involving a specialized whole life policy that would supposedly provide tax benefits. American General knew but concealed from plaintiffs that the plans no longer complied with the law. Plaintiffs suffered losses as a result of this fraud by concealment. Among other tasks, Michael had primary responsibility for working with plaintiffs’ damages expert and conducted the direct and re-direct examination of this expert at trial. The case settled for a confidential sum 8 days into the jury trial.

Smith et. al. v. American General Ins. Co. - Michael was a key member of the litigation team that represented nine high net worth plaintiffs in this RICO action alleging that American General and the other members of the enterprise falsely marketed and sold our clients a whole life policy that would *supposedly* provide a multitude of tax benefits, but concealed the fact that the IRS had changed its regulations, rendering these plans no longer compliant with the law. Among other tasks, Michael had primary responsibility for working with plaintiffs’ damages expert and deposing the defendants’ damages expert. The case settled for a confidential sum.

Ammari v. Pacific Bell Directory – Represented consumers who overpaid an AT&T subsidiary for advertising in Yellow Pages directories. Plaintiffs prevailed at trial and on two appeals to obtain a \$27 million judgment for class members, a result the *National Law Journal* deemed as one of the top 100 verdicts in 2009.

In Re Sulzer Hip Prosthesis and Knee Prosthesis Liability Litigation – recovered over \$10 million on behalf of his clients in this multidistrict litigation that awarded a total of \$1 billion to patients who received defective hip implants.

Awards & Honors

Northern California Super Lawyers, 2019



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Practice Emphasis

Class Actions
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Financial Fraud
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Education

Emory University School
of Law, J.D., 2007

University of California at
Santa Barbara, B.A.,
2003

Admissions

California

David Stein | Partner

David Stein represents clients in federal and state cases nationwide, ranging from securities and financial fraud class actions, to product liability, privacy, and data breach suits. Courts have appointed David as lead counsel in a number of these cases and he has been praised by *Law360* as a tenacious litigator with a “reputation as one of the best consumer advocates around.”

The *Daily Journal* recognized David as one of the Top 40 attorneys in the state of California under the age of 40, and he was also honored in *Law360*'s nationwide list of “Top Class Action Attorneys Under 40.” For the last seven years, he has been rated by his colleagues as a Northern California Super Lawyers Rising Star.

David is frequently called upon to discuss emerging issues in complex litigation. He has twice been selected to serve on *Law360*'s Product Liability Editorial Advisory Board, advising on emerging trends impacting product liability cases.

Before entering private practice, David served as judicial law clerk to U.S. District Court Judge Keith Starrett and U.S. Magistrate Judge Karen L. Hayes.

Reputation and Recognition by the Courts

David has built a reputation for the quality of his representation and tenacious advocacy on behalf of the clients and classes he represents:

“[T]his is an extraordinarily complex case and an extraordinarily creative solution... I [want to] thank you and compliment you gentlemen. It's been a real pleasure to work with you.” - *Hon. D. Carter, Glenn v. Hyundai Motor America (C.D. Cal.)*

“You made it very easy to deal with this case and clearly your years of expertise have carried the day here. Nice work. Thank you.” -*Hon. M. Watson, In re Am. Honda Motor CR-V Vibration Litig. (S.D. Ohio)*

“Exceedingly well argued on both sides. Sometimes people really know their stuff on both sides which is what happened today so thank you.” -*Hon. J. Tigar, In re General Motors CP4 Fuel Pump Litig. (N.D. Cal.)*

Litigation Highlights

Deora v. NantHealth – Lead Counsel for certified classes of investors in litigation alleging violations of federal securities laws related to the healthcare technology company’s initial public offering in 2016. In December 2019, the parties announced they had reached a \$16.5 million class action settlement; preliminary approval is pending.

Paeste v. Government of Guam – Secured a judgment against the Government of Guam and several of its highest-ranking officials in a suit involving the government’s unlawful administration of income tax refunds. Mr. Stein defended the judgment in an oral argument before the U.S. Court of Appeals for the Ninth Circuit, leading to a complete victory for the taxpayers in the published decision, *Paeste v. Government of Guam*, 798 F.3d 1228 (9th Cir. 2015)

Edwards v. Ford Motor Co. – In a class action alleging that Ford sold vehicles despite a known safety defect, Mr. Stein twice argued plaintiff’s position before the U.S. Court of Appeals for the Ninth Circuit. In the first appeal, Mr. Stein succeeded in obtaining a reversal of the trial court’s denial of class certification. In the second, plaintiff again prevailed, with the Ninth Circuit affirming the conclusion that the lawsuit had driven Ford to offer free repairs, reimbursements, and extended warranties to the class.

In re: Peregrine PFG Best Customer Accounts Litigation - Represented investors in a lawsuit against U.S. Bank and JPMorgan Chase arising from the collapse of Peregrine Financial Group, Inc. The former Peregrine customers were seeking to recover the millions of dollars that was stolen from them out of segregated funds accounts. Plaintiffs' efforts led to settlements with JPMorgan Chase and U.S. Bank worth over \$75 million.

In re: Hyundai Sonata Engine Litigation – Mr. Stein served as court-appointed co-lead counsel in this nationwide suit involving engine seizures at high speeds. The litigation led to a settlement that included nationwide vehicle recalls, extended warranties, and payments that averaged over three thousand dollars per class member.

Browne v. American Honda Motor Co., Inc. – Represented consumers who alleged that 750,000 Honda Accord and Acura TSX vehicles were sold with brake pads that wore out prematurely. A settlement ensued worth approximately \$25 million, with hundreds of thousands of class members electing to participate.

Awards & Honors

“2017 Top 40 Under 40,” *Daily Journal*

Top Class Action Attorneys Under 40, *Law360* Rising Stars (2017)

Northern California Super Lawyers *Rising Star* (2013-2018)

Professional Affiliations

American Association for Justice

Consumer Attorneys of California

Federal Bar Association

Public Justice Foundation

Publications & Presentations

Co-Author, “Recent Decision Highlights the Importance of Early Discovery in Arbitration,” *Daily Journal*, May 2019.

Presenter, “Article III Standing in Data Breach Litigation,” AAJ Class Action Seminar, December 2018.

Presenter, “Determining Damages in Class Actions,” *Class Action Mastery Conference*, HB Litigation, May 2018.

Presenter, “Mass Torts and Class Actions: The Latest and Greatest, Update on Class Action Standing” *56th Annual Consumer Attorneys of California Convention*, November 2017.

Author, Third Circuit Crystallizes Post-Spokeo Standard, *Impact Fund Practitioner Blog*, July 2017.

Presenter, “Class Certification,” “Class Remedies,” *HB Litigation Conferences, Mass Tort Med School + Class Actions*, March 2017.

Co-Author, “Beware Intended Consequences of Class Action Reform, Too,” *Law360 Expert Analysis*, March 14, 2017.

Co-Author, “California Omissions Claims: Safety Required?” *Law360 Expert Analysis*, February 15, 2017.

Author, *Wrong Problem, Wrong Solution: How Congress Failed the American Consumer*, 23 Emory Bankr. Dev. J. 619 (2007).



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Practice Emphasis

Class Actions
Employment Litigation

Education

University of California,
Berkeley School of Law, J.D.,
magna cum laude, 1996.

Yale University, B.A., *summa cum laude*, *Phi Beta Kappa*.

Steven Tindall | Partner

Steven Tindall has specialized in employment and class action litigation for nearly 20 years. He has been plaintiffs' lead or co-lead counsel on several cases that resulted in settlements worth over \$1 million. Prior to joining Gibbs Law Group, Steven was a partner at Rukin Hyland Doria & Tindall, and at Lieff Cabraser Heimann & Bernstein. While at Lieff Cabraser, Steven focused on plaintiffs' class action litigation in the fields of wage and hour law, antitrust, and consumer protection. Steven has also litigated a number of mass tort personal injury and toxic tort cases.

Steven received his B.A. degree in English Literature from Yale University, graduating *summa cum laude*, Phi Beta Kappa, and with distinction in his major. He earned his J.D. degree from the University of California at Berkeley School of Law (Berkeley Law) in 1996. While at Berkeley Law, Steven co-directed the East Bay Workers' Rights Clinic. After graduating from law school, Steven clerked for Hon. Judith N. Keep of the United States District Court for the Southern District of California and for Hon. Claudia Wilken of the U.S. District Court for the Northern District of California.

In 2019, Steve received the California Lawyer Attorney of the Year (CLAY) Award for his work in *De La Torre v. CashCall*.

Awards & Honors

California Lawyer Attorney of the Year (CLAY) Award (2019)
Northern California Super Lawyers (2009-2019)

Professional Affiliations

East Bay Community Law Center, Board Member

Publications & Presentations

Contributor, "Can Interest Rates be Unconscionable?" Daily Journal Appellate Report Podcast, July 6, 2018.

Co-Author, "Epic Systems and the Erosion of Federal Class Actions," Law360 Expert Analysis, July 5, 2018.

Co-Author, "Senate Should Reject Choice Act and Its Payday Free Pass," Law360 Expert Analysis, July 12, 2017.

Presenter, "Preparing for and Litigating PAGA Claims 2017," Bridgeport Continuing Education, March 3, 2017.

Contributing Author, California Class Actions Practice and Procedure, Matthew Bender & Co., Inc., 2006

Author, *Do as She Does, Not as She Says: The Shortcomings of Justice O'Connor's Direct Evidence Requirement in Price Waterhouse v. Hopkins*, Berkeley Journal of Employment and Labor Law, 17, No. 2, 1996

Admitted

California



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Practice Emphasis

Class Actions
Consumer Protection
Mass Personal Injury
Whistleblower/ Qui Tam

Education

University of California,
Hastings College of Law, J.D.,
magna cum laude, 2010.

University of Missouri, B.A.,
summa cum laude, 1998.

Admissions

California
Florida

Amy Zeman | Partner

Amy Zeman represents clients in a variety of mass injury matters with specialized expertise in coordinating and tracking large sets of client data in complex, multi-party cases. She currently serves as court-appointed liaison counsel in *In re Risperdal and Invega Product Liability Cases*, coordinated litigation on behalf of thousands of male children who suffered irreversible breast growth after taking the antipsychotic drug. She represents individuals affected by the wide-scale storage tank failure at Pacific Fertility Center and those harmed by the well rupture and gas leak in Aliso Canyon, California. Amy also represents women who suffered permanent baldness following breast cancer chemotherapy treatments with Taxotere, and men who experienced heart attack, stroke, or other serious side effects after taking prescription testosterone supplements. In addition to mass tort litigation, Amy represents consumers in class action cases, working closely with class representatives. She has been named a *Rising Star* by Northern California Super Lawyers every year since 2013.

Prior to attending law school, Ms. Zeman pursued a career in the financial sector. Ms. Zeman served the members of the Marin County Federal Credit Union for almost seven years, acting as the Accounting and Compliance Manager. Ms. Zeman was a spring 2010 extern for the Honorable Marilyn Hall Patel of the United States District Court, Northern District of California.

Litigation Highlights

Mass Tort Litigation

In re Risperdal and Invega Product Liability Cases – appointed by a California judge to serve as liaison counsel, responsible for coordinating and overseeing the lawsuits filed on behalf of thousands of male children who took the popular antipsychotic drug Risperdal and suffered irreversible gynecomastia, or male breast growth.

Pacific Fertility Center Litigation – represents patients whose frozen eggs and embryos were harmed following a massive equipment failure at the Pacific Fertility Center. The lawsuit alleges that the cryo-preservation tank was defective, and that Pacific Fertility Center failed to have proper safety protocols in place.

Southern California Gas Leak Cases – represents residents of communities in or near the Los Angeles suburb of Porter Ranch who were affected by the Aliso Canyon well rupture and ensuing gas leak, the largest methane leak in U.S. history. The lawsuits seek relief for those who were displaced from their homes, suffered illnesses and injuries, sustained property value losses, or lost business due to the leak.

Taxotere (Docetaxel) Products Liability Litigation – selected to serve on the discovery committee in this multi-district litigation on behalf of breast cancer survivors who suffered permanent, disfiguring hair loss after using the Taxotere chemotherapy drug.

Testosterone Replacement Therapy Products Liability Litigation – represents men who suffered heart attack, stroke, and other serious side effects after taking prescription testosterone supplements.

Yaz & Yasmin Birth Control Litigation – represented women throughout the country who suffered serious side effects after taking Yaz, Yasmin and Ocella birth control. The federal litigation resulted in settlements worth approximately \$1.6 billion.

Pelvic System Products Liability Litigation (transvaginal mesh) - represented women nationwide who suffered serious complications after receiving transvaginal mesh implants.

Actos (Pioglitazone) Products Liability Litigation – represented individuals who were diagnosed with bladder cancer after taking the oral diabetic drug Actos. The federal litigation resulted in a \$2.37 billion settlement.

Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation – represented dialysis patients who suffered cardiac arrest after being administered GranuFlo dialysis treatments. The litigation resulted in a \$250 million settlement.

Defective Product and Consumer Protection Litigation

Sanborn, et al. v. Nissan North America, Inc. – appointed as class counsel with Eric Gibbs and others. Obtained a settlement 11 days before trial was set to begin on claims that the dashboards in certain Nissan vehicles were melting into a shiny, sticky surface that produced a dangerous glare. The settlement allowed class members to obtain a \$1500-\$2000 dashboard replacement for just \$250, or equivalent reimbursement for prior replacements.

Chase Bank U.S.A., N.A. “Check Loan” Contract Litigation – key member of the litigation team in this multidistrict case alleging that Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. The litigation resulted in a \$100 million settlement eight weeks prior to trial.

Sugarman v. Ducati North America, Inc., - represented Ducati motorcycle owners whose fuel tanks on their motorcycles degraded and deformed due to incompatibility with the motorcycles’ fuel. In January 2012, the Court approved a settlement that provided an extended warranty and repairs, writing, “The Court recognizes that class counsel assumed substantial risks and burdens in this litigation. Representation was professional and competent; in the Court’s opinion, counsel obtained an excellent result for the class.”

Awards & Honors

Rising Star, Northern California Super Lawyers (2013-2019)

Professional Affiliations

American Association for Justice - Co-Vice Chair of the Class Action Litigation Group; Past Co-Chair of the Qui Tam Litigation Group; Member of the Women Trial Lawyers Caucus

Association of Business Trial Lawyers

Consumer Attorneys of California

Publications & Presentations

Co-author, “Tips on Client Contact and Case Management in Mass Torts Part I: Client Intake and Gathering Relevant Information,” American Association for Justice, Women Trial Lawyers Caucus Connections Count Newsletter, 2013.

Co-author, “Tips on Client Contact and Case Management in Mass Torts Part II: Organizing and Working with Client Information,” American Association for Justice, Women Trial Lawyers Caucus Connections Count Newsletter, 2013.

Presenter, “Fees in Class Action Cases,” and “Qui Tam Case Strategies,” Mass Tort Med School and Class Action Conference, March 2017.

Presenter, “Claims-processing in Large and Mass-Tort MDLs,” Emerging Issues in Mass-Tort MDLs Conference, Duke University, October 2016.

Presenter, “Best Practices in Law Firm Management,” American Association for Justice 2016 Winter Convention, Women’s Trial Lawyers Caucus Leadership Summit, February 2016.

Presenter, “Lumber Liquidators Litigation,” American Association for Justice 2015 Annual Convention, July 2015.



A.J. de Bartolomeo | Of Counsel

A.J. De Bartolomeo has nearly thirty years of experience prosecuting class actions and complex matters in courts throughout the country. She has extensive expertise litigating mass personal injury matters involving defective drugs and medical devices. A.J. currently serves in court-appointed leadership positions in several MDL mass tort actions, including serving on the Plaintiffs' Steering Committees in the *In re: Yaz and Yasmin Birth Control Litigation*, *In re: Actos Products Liability Litigation* and *In re: Pradaxa Products Liability Litigation*. She serves on the Law and Briefing committees and has been involved with *Daubert* briefings in a number of cases. A.J. previously served on the Plaintiff's Steering Committee in the *In re Transvaginal Mesh Litigation*.

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Practice Emphasis

Class Actions
Consumer Protection
Employment Law
Mass Personal Injury
Securities Law

Education

University of California,
Hastings College of Law,
J.D., 1988

Fairfield University, B.A.,
1982

University of London,
London School of
Economics (General
Course Degree, 1981)

Admissions

California

Awards & Honors

AV Preeminent® Peer
Review Rated by
Martindale-Hubbell

*Northern California Super
Lawyer* (2013 - 2019)

AAJ Above and Beyond
Award, 2018

AAJ *Distinguished Service
Award*, 2016

Committed to advancing opportunities for women lawyers, Ms. De Bartolomeo is the former Chair of the Women's Trial Lawyer Caucus of the American Association of Justice, where she oversaw the caucus's work in leadership training, student scholarship, membership and political outreach, and other pro-civil justice functions. She is an active member of the American Bar Association Sections on Tort Trial and Insurance Practice, the American Bankruptcy Institute and Consumer Attorneys of California. Ms. De Bartolomeo has been named among the highest class of attorneys for professional ethics and legal skills with an AV-Preeminent rating by *Martindale Hubbell*, and was recognized by her peers as a Northern California *Super Lawyer* every year since 2013.

Ms. De Bartolomeo frequently speaks before industry organizations on developments in consumer class actions, mass tort litigation, *Daubert* challenges, Rule 37 and Inherent Power sanctions, and the settlement approval process.

Ms. De Bartolomeo is Of Counsel to Gibbs Law Group and a partner at Tadler Law LLP.

Litigation Highlights

Consumer Protection, Bankruptcy and Securities Litigation

In re Motors Liquidation Company, et al., f/k/a General Motors Corp., et al. (Bankruptcy Litigation) – A.J. served as Lead Counsel for unsecured creditors in two class action cases in the General Motors bankruptcy proceedings (court-certified classes in *In Re Piston Slap Class Litigation* and *In Re Dex-Cool Class Litigation*). The cases were settled in Bankruptcy Court for nearly \$12 million.

In re American Express Advisors Securities Litigation – Served as second chair and achieved settlement of \$100 million on behalf of individuals who bought financial plans and invested mutual funds from American Express Financial advisors.

CalSTRS v. Qwest Communications, et al. – Served as Co-Lead Counsel in the representation of California State Teachers' Retirement System in opt-out securities fraud action against Qwest Communications, Inc. and certain of its officers and directors, as well as its outside auditor Arthur Andersen. Settled for \$45 million.

Telstar v. MCI, Inc. – Served as lead counsel achieving settlement of more than \$2.8 million in cash on behalf of class of commercial subscribers alleging FCA violations for unfair billing practices.

In re MCI Non-Subscriber Rates Litigation – Served as second chair and achieved \$90 million cash settlement on behalf of MCI subscribers who were charged MCI's non-

subscriber or “casual caller” rates and surcharges instead of the lower rates which MCI advertised and subscribers expected to be charged.

Lehman v. Blue Shield – A.J. served as lead counsel and achieved a settlement for more than \$6.5 million in cash on behalf of class of subscribers overpaying insurance premiums.

Mass Personal Injury

In re: Yaz & Yasmin Birth Control Litigation – A.J. serves on the Plaintiffs’ Steering Committee in this coordinated litigation on behalf of women throughout the country who suffered serious side effects after taking Yaz, Yasmin and Ocella birth control. She serves as co-chair of the Law and Briefing committee and substantially contributed to the *Daubert* briefing that defeated all of the defendants’ 16 challenges to plaintiffs’ expert testimony.

In re: Actos Products Liability Litigation – A.J. serves on the Plaintiffs’ Steering Committee in this coordinated litigation on behalf of individuals who were diagnosed with bladder cancer after taking the oral anti-diabetic drug Actos. She serves as a member of the Law and Briefing committee in this litigation.

In re: Pradaxa Products Liability Litigation – A.J. serves on the Plaintiffs’ Steering Committee in this coordinated litigation on behalf of individuals who suffered internal hemorrhaging and other serious complications after taking the anticoagulant drug Pradaxa. She serves on the *Daubert* briefing committee in this case.

Professional Affiliations

American Association for Justice- Member, Board of Governors; Chair, State Trial Lawyers Association (TLA) Outreach Committee; Former Chair, Women’s Trial Lawyer’s Caucus; Member, Class Action Litigation Group.

Consumer Attorneys of California

American Bar Association- Tort Trial and Insurance Practice Section

American Bankruptcy Institute

Publications & Recent Presentations

Presenter, “Communicating with the Class,” Class Action Mastery Conference, HB Litigation, May 2018.

Presenter, “Current Class Action Landscape in Opioids Multidistrict Litigation,” HB Litigation: Opioid Crisis- Claims, Damages & Science, January 2018.

Presenter, “Class Treatment: Can These Claims be Resolved by a Class Action?” American Association for Justice: Opioid Litigation Seminar, September 2017.

Presenter and Moderator, “Are you going to eat that? Issues, hurdles and opportunities in food and supplement litigation,” 26th Annual Spring CLE Meeting for the American Bar Association Tort and Insurance Practice Section (TIPS), Toxic Torts and Environmental Law Committee, April 2017.

Presenter, “Strategies for Dealing with Objectors to Class Action Settlements,” Consumer Attorneys of California Class Action Seminar, February 2017.

Presenter, “Plastic in the Pelvis: Essure and Mesh Litigation,” Harris Martin Women’s Health Litigation Conference, June 2016.

Presenter, “Combatting the Latest Defense Tactics in Mass Torts/ Plaintiff Practice,” Consumer Attorneys of California Sonoma Travel Seminar, April 2016.



John Kehoe | Of Counsel

John Kehoe prosecutes securities and financial fraud cases in federal and state courts on behalf of institutional and individual clients. He has served as lead counsel in a number of precedent-setting cases including *In re Bank of America Corporation Securities Litigation* (\$2.4 billion settlement); *In re Wachovia Preferred Securities and Bond/Notes Litigation* (\$627 million settlement); *In re Initial Public Offering Securities Litigation* (\$586 million settlement resolving 309 consolidated actions); *In re Lehman Brothers Securities and ERISA Litigation* (\$516 million settlement); and *In re Marvell Technology Group Ltd. Securities Litigation* (\$72 million settlement). He also had a significant prosecutorial role in *In re Brocade Securities Litigation* (\$160 million settlement).

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Practice Emphasis

Class Actions
Securities Litigation

Education

Syracuse University College of Law, J.D., *magna cum laude*

University of Vermont, M.P.A.

DePaul University, B.A.

Admissions

New York
Pennsylvania

John has represented clients before the Second and Eleventh Circuit Courts of Appeals, and he is active in merger and acquisition litigation before The Delaware Court of Chancery, including serving on the Executive Committee in *In re Safeway Stockholders Litigation*, through which value of the transaction to stockholders was increased by more than \$80 million.

Prior to attending law school, John worked as a law enforcement officer in the State of Vermont (1986-94), serving as a member of the tactical Special Reaction Team and the Major Accident Investigation Team. He is a program faculty member with the National Institute of Trial Advocacy, and served as an adjunct faculty member with the Trial Advocacy Training Program at the Louisiana State University School of Law.

John is a frequent speaker at conferences focused on shareholder rights and corporate governance issues. He received his Juris Doctorate, *magna cum laude*, from Syracuse University College of Law. He also received a Masters of Public Administration from the University of Vermont, and Bachelor of Arts from DePaul University, where he was starting goalkeeper on the Division I soccer team, and an exchange student to the University of Economics in Budapest, Hungary.

John is Of Counsel to Gibbs Law Group and a shareholder at Kehoe Law Firm.



Robert Mosier | Of Counsel

Mr. Mosier's practice is almost exclusively focused on representing plaintiffs harmed by large pharmaceutical and medical device companies. He represents clients injured by Granuflo, Tylenol, Risperdal, Medtronic Infuse, Reglan, Crestor, Pain Pumps, Transvaginal Mesh, DePuy ASR and Pinnacle Hips, Januvia, Byetta and Yaz. Mr. Mosier serves as court-appointed co-lead counsel and liaison counsel and on leadership committees in consolidated litigation throughout the United States.

Mr. Mosier currently serves as Plaintiffs' Co-Lead Counsel in the Risperdal and Invega Product Liability Cases JCCP 4775 litigation, and as Plaintiff's Liaison Counsel in the In re Infusion Pain Pump JCCP 4615 litigation. Mr. Mosier is appointed to the Plaintiff's Steering Committee in the In Re Incretin Mimetics Product Liability Litigation MDL 2452, and the In Re Zolofit Birth Defect Cases JCCP4771. Mr. Mosier is appointed to the Science Committee in the In re Fresenius Granuflo/Naturalyte Dialysate Products MDL 2428.

Prior to joining Sanders Viener Grossman as trial counsel and managing attorney, Mr. Mosier was a partner at McGregor & Mosier, where he obtained numerous multi-million dollar settlements for injured plaintiffs in medical malpractice, brain injury, birth injury, and other significant injury matters through trial. Mr. Mosier also represented victims involved in unique injury and death cases, including hot air balloon crashes, trucking deaths and molestation cases.

Before working to represent the rights of injured plaintiffs, Mr. Mosier represented hospitals, physicians, and medical providers accused of malpractice at one of California's preeminent medical malpractice defense firms. During his tenure as a defense attorney, Mr. Mosier gained invaluable insight and education into the practice of medicine, health care and medical insurance issues.

Mr. Mosier has held an AV Preeminent Attorney rating from Martindale Hubble since 2002, is a National Trial Lawyers – Top 100 Attorney, and an Arizona Top Rated Attorney – Top Trial Lawyers in America.

Mr. Mosier frequently speaks at national legal conventions on various issues involving mass tort litigation. He has prosecuted diverse appellate court issues, obtaining published opinions in the areas of constitutional law, separation of court jurisdiction and dischargeability of intentional tort claims. While working as a medical malpractice defense attorney, Mr. Mosier served as liaison counsel for the Orange County Medical Association/ Orange County Bar Association committee and was frequently invited to speak to hospitals and their staffs on medical/legal issues affecting doctor-patient care.

Robert A. Mosier is Of Counsel to Gibbs Law Group LLP and managing attorney of Sanders Viener Grossman LLP's Los Angeles office.

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Practice Emphasis

Class Actions

Mass Personal Injury

Education

J.D., B.S.L., Thomas Jefferson
School of Law, 1992.

Admissions

New York

California

Arizona



T 209.369.3962
gws@classlawgroup.com

Practice Emphasis

Antitrust Litigation
Class Actions

Education

New York University School of
Law, J.D.
Cornell University, B.A

Admissions

Washington

George Sampson | Of Counsel

George Sampson brings 35 years of experience prosecuting complex antitrust cases on behalf of consumers and small businesses. George began his career in antitrust enforcement in 1984, when he joined the New York Attorney General's Antitrust Bureau. He served as an Assistant Attorney General for 10 years – the last two years (1992-1994) as Chief of the Antitrust Bureau. George was the lead trial attorney in a civil bid-rigging action in which he won the state's first ever bid-rigging jury trial, recovering \$7.8 million for the state.

George's principal experience has been to assist expert witnesses in antitrust cases. He has either taken or defended the deposition of nearly every leading antitrust economist, whether at the class certification stage or the liability and damages phases of complex antitrust class actions. He is conversant with complex economic analyses, econometric damages models, and equally important, translating expert economic analysis into language judges and juries can readily grasp.

Currently George serves as Trial Counsel in the Disposable Contact Lens Antitrust Litigation, a class action lawsuit filed 14 years after the original Contact Lens case was tried in 2001. Along with Michael Schrag, he has been principally responsible for all of the expert economics work on the case, including presenting evidence at the two-day class certification hearing. The court's 178 page order granting class certification has been appealed by defendants.

George Sampson is Of Counsel to Gibbs Law Group and the founding partner of Sampson Dunlap LLP.

Litigation Highlights

In re Disposable Contact Lens Antitrust Litigation

George served as co-lead counsel where he was principally responsible for all expert economic testimony. He successfully settled the case after five weeks of trial for a total recovery in excess of \$90 million.

In re Visa Check/MasterMoney Antitrust Litigation

George was appointed co-lead counsel to the litigation team. His team achieved settlement on the eve of trial for \$3 billion, at the time the largest antitrust class settlement ever achieved.

McDonough v. Toys R Us

George took on a "hub-and-spoke" case against Toys R Us for forcing baby product manufacturers to raise prices at competing retailers. Again, George was principally responsible for all expert economic testimony. After extensive discovery and a two-day class certification hearing, the case settled for \$35 million.

Professional Affiliations

American Antitrust Institute, Advisory Board Member
American Bar Association, Antitrust Law Section
Washington State Bar Association, Antitrust and Consumer Protection Committee

Michael Yarnoff | Of Counsel

T 510.350.9700
mky@classlawgroup.com

Practice Emphasis

Class Actions
Securities Litigation

Education

Delaware Law School, J.D.
George Washington University,
B.A.

Admissions

Delaware
New Jersey
Pennsylvania

Michael Yarnoff has more than 25 years of experience, including 15 years prosecuting complex securities fraud class actions in federal courts involving claims under both the Securities Act of 1933 and the Exchange Act of 1934. Throughout his career, Michael has represented large institutional clients and individual shareholders and has acted as lead or co-lead counsel in a number of high-profile securities cases, which, collectively, have settled for billions of dollars.

Michael was previously an attorney at a large plaintiff's class-action law firm, where he served as a senior-level partner in the securities department for over nine years. During that time, he also litigated a number of cases against large mortgage lenders for violations of the Real Estate Settlement Procedures Act of 1974, patent infringement matters, and appellate matters before multiple Circuit Courts of Appeal.

Michael received his Juris doctorate from Delaware Law School in 1991 and his undergraduate degree from George Washington University in 1988. While at George Washington University, he served as a political intern for the late Senator John Heinz (Pennsylvania).

Michael Yarnoff is Of Counsel to Gibbs Law Group and a shareholder at Kehoe Law Firm.

Litigation Highlights

Tyco International Ltd. – A landmark \$3.2 billion settlement including the then largest securities class-action recovery from a single corporate defendant (\$2.975 billion) and the second largest auditor settlement (\$225 million).

Delphi Corporation – A \$300 million class-action settlement against auto-parts manufacturer Delphi Corporation (reduced as a result of bankruptcy), including an additional \$38 million recovery against Delphi's outside auditor.

CVS Corporation – A \$110 million recovery on behalf of a group of injured shareholders, representing one of the largest settlements in a securities class-action in First Circuit history.

MDL Mutual Fund Litigation – A six-year litigation that resulted in more than \$80 million in recoveries against a number of mutual fund companies, including Alliance, Alger, and Excelsior.

Associates and Counsel

Joshua Bloomfield prosecutes complex class action lawsuits with particular experience in data breach, privacy cases and antitrust disputes. He has focused his legal career in civil and administrative litigation and real estate law for more than 15 years. Joshua is a 2000 graduate of UCLA School of Law. He received his undergraduate degree in a three-year accelerated course of study from University of Pennsylvania in 1996.

Aaron Blumenthal represents consumers and whistleblowers in class action lawsuits involving allegations of corporate misconduct. He has prosecuted a variety of consumer protection cases ranging from false advertising to defective products. He is also involved in the investigation and development of new cases.

Aaron was honored as a “Rising Star” by Northern California Super Lawyers (2018-2019). He attended the University of California, Berkeley School of Law (Berkeley Law), where he graduated *Order of the Coif* (a distinction awarded only to the top 10 percent of the graduating class). In law school, Aaron worked on consumer issues— writing and publishing a law review article on the practical strategies for combatting class action waivers in a post-*Concepcion* world.

Kyla Gibboney represents plaintiffs in antitrust cases and other complex class actions. Before joining Gibbs Law Group, she represented injured consumers and workers in litigation against some of the largest companies in the world across a variety of industries including pharmaceuticals, technology and social media. She was selected as a “Rising Star” by Northern California Super Lawyers in 2018 and 2019.

Kyla graduated cum laude from the University of California, Hastings College of the Law in 2014, where she served as the Executive Articles Editor of the Hastings Constitutional Law Quarterly. During law school, Kyla served as a legal extern for the Antitrust Division of the Department of Justice, where she gained hands-on trial and regulatory experience. She also completed judicial externships for Magistrate Judge Kandis A. Westmore of the Northern District of California and Justice Sandra L. Margulies of the California Court of Appeal for the First District.

Amanda Karl represents consumers, employees and others who have been harmed by corporations. She is a 2014 graduate (Order of the Coif) of the University of California at Berkeley School of Law (Berkeley Law), where she served as the Managing Editor of the California Law Review, Director of the Workers’ Rights Disability Law Clinic and Research Assistant to Professor Robert Berring, Jr. She also worked throughout law school as a Clinical Law Student at the East Bay Community Law Center, assisting with litigation targeting criminal record reporting violations, and as a law clerk at Equal Rights Advocates, where she worked on women’s employment issues involving wage and hour law, pregnancy discrimination, ADA and Title VII. Amanda received her undergraduate degree, magna cum laude, in Sociology and Human Rights from Columbia University in 2009.

Amanda was honored as a “Rising Star” by Northern California Super Lawyers (2018-2019). Following graduation from law school, she served as a law clerk to the Honorable Richard A. Paez, United States Court of Appeals for the Ninth Circuit (2014-2015), and as a law clerk to the Honorable Claudia Wilken, Northern District of California (2015-2016).

Jeffrey Kosbie is a 2015 graduate, magna cum laude, of Northwestern University School of Law and Northwestern University Graduate School where he received a J.D. and a Ph.D. in Sociology. While in law school, Jeffrey served as an Articles Editor of the Northwestern Journal of Law and Social Policy. He received his undergraduate degree, summa cum laude, *Phi Beta Kappa*, in Sociology from Brandeis University in 2006.

Jeffrey worked as a staff attorney in the United States Court of Appeals for the Ninth Circuit (2017-2018) and served as a Multidistrict Litigation Law Clerk to the Judges Lucy Koh, Beth Freeman, and Edward Davila of the Northern District of California (2018-2019). He authored *Donor Preferences and the Crisis in Public Interest Law*, 57 SANTA CLARA L. REV. 43 (2017) and *(No) State Interests in Regulating Gender: How Suppression of Gender Nonconformity Violates Freedom of Speech*, 19 WM. & MARY J. WOMEN & L. 187 (2013).

Linda Lam focuses her practice on representing consumers, small businesses, and employees in complex contingency litigation. Before joining the firm, Linda was an associate attorney at a national employee benefits and employment law firm, where she represented workers and retirees.

Linda was honored as a “Rising Star” by Northern California Super Lawyers (2017 – 2019). She graduated *magna cum laude* from the University of California, Hastings College of the Law in 2014, where she was inducted into the Order of the Coif. In law school, Linda served as the Production Editor for the Hastings Race and Poverty Law Journal. She worked as a research assistant to Professor Reuel Schiller. Additionally, Linda worked on a team in the Refugee and Human Rights Clinic to win asylum status for a domestic violence victim from Mexico. In 2012, she externed for the Honorable Joseph Spero in the Northern District of California.

Steve Lopez is a 2014 graduate of the University of California, Berkeley School of Law (Berkeley Law), where he was a Publishing Editor for the California Law Review and an Editor for the Berkeley Journal of Employment and Labor Law. He was a member of the La Raza Law Students Association and the Legal Aid Society–Employment Law Center’s Berkeley Workers’ Rights Clinic, where he successfully argued a client’s unemployment insurance appeal in an administrative hearing. Steve was the recipient of the American Jurisprudence Award in Insurance Law, and the Prosser Prize in Remedies and Employee Benefits Law.

He was selected as a “Rising Star” by Northern California Super Lawyers (2017-2019). Before law school, Steve performed research for a consulting firm specializing in improving justice programs. He received his undergraduate degree in economics and international relations from the University of Virginia in 2008.

Nikul Shah represents consumers in complex personal injury and class action lawsuits. He is an experienced e-discovery attorney with expertise conducting detailed legal analyses of electronic documents, identifying key documents for litigation, and overseeing a team of attorneys to ensure quality control over large-scale projects. He has volunteered his legal services to vulnerable consumers at CARPLS, Cook County, Illinois’ largest provider of free legal services. He is also a Certified Information Privacy Professional (CIPP/ US) and is focused on product transparency and privacy notices impacting consumers’ rights. Nikul is a 2010 graduate of Gonzaga University School of Law. He received his undergraduate degree from the University of Wisconsin in 2005.

SIGNIFICANT RECOVERIES

Some examples of the cases in which our lawyers played a significant role are described below:

Antitrust and Unfair Business Practices

In re: Wells Fargo Collateral Protection Insurance Litigation, MDL Case No.: 8:17-ML-2797 (C.D. Cal.). Eric Gibbs and Michael Schrag were appointed to the three-firm Plaintiffs' Steering Committee in this multi-district litigation on behalf of consumers who took out car loans from Wells Fargo and were charged for auto insurance they did not need. The parties announced a proposed settlement of at least \$393.5 million for affected consumers and the Court granted final approval in November 2019.

In re Currency Conversion Fee Antitrust Litigation, MDL No. 1409 (S.D.N.Y.); ***Schwartz v. Visa, et. al.***, No. 822404-4 (Cal. Super. Ct., Alameda Cty). Mr. Schrag helped initiate and prosecute several class actions against Visa, MasterCard, and other major U.S. banks, such as Chase and Bank of America, for failing to disclose their price fixing of currency conversion fees charged to cardholders. After prevailing at trial in *Schwartz v. Visa, et. al.*, plaintiffs were successful in obtaining a \$336 million global settlement for the class.

In re TFT-LCD (Flat Panel) Antitrust Litigation, MDL 1827 (N.D. Cal.). Gibbs Law Group attorneys were among the team serving as liaison counsel in this multi-district antitrust litigation against numerous TFT-LCD (Flat Panel) manufacturers alleging a conspiracy to fix prices, which has achieved settlements of more than \$400 million to date.

In re Natural Gas Antitrust Cases I, II, III and IV, JCCP No. 4221 (Cal. Super. Ct. San Diego Cty). Gibbs Law Group attorneys served in a leadership capacity in this coordinated antitrust litigation against numerous natural gas companies for manipulating the California natural gas market, which has achieved settlements of nearly \$160 million.

Beaver v. Tarsadia Hotels, No. 11-cv-1842 (S.D. Cal.); Gibbs Law Group attorneys served as co-lead counsel representing buyers of San Diego Hard Rock Hotel condominium units in this class action lawsuit against real estate developers concerning unfair competition claims. The lawsuit recently settled for \$51.15 million.

LLE One, LLC et al. v. Facebook, Inc., No. 4:16-cv-6232 (N.D. Cal.); Gibbs Law Group attorneys represent small businesses and other advertisers in a class action lawsuit alleging that Facebook overstated its metrics for the average time spent watching video ads on its platform. The Court granted preliminary approval to a \$40 million class action settlement on November 6, 2019, and a final approval hearing will be held in early 2020.

Ammari Electronics, et al. v. Pacific Bell Directory, No. RG05198014 (Cal. Super. Ct. Alameda Cty.). Mr. Schrag obtained a \$27 million judgment against an AT&T subsidiary after a jury trial and two successful appeals in this breach of contract class action on behalf of thousands of California businesses that advertised in Pacific Bell yellow pages directories. The National Law Journal featured this win in its "Top 100 Verdicts of 2009."

In re LookSmart Litigation, No. 02-407778 (Cal. Super. Ct. San Francisco Cty). This nationwide class action suit was brought against LookSmart, Ltd. on behalf of LookSmart's customers who paid an advertised "one time payment" to have their web sites listed in LookSmart's directory, only to be later charged additional payments to continue service. Plaintiffs' claims included breach of contract and violation of California's consumer protection laws. On October 31, 2003, the Honorable Ronald M. Quidachay granted final approval of a nationwide class action settlement providing cash and benefits valued at approximately \$20 million.

Lehman v. Blue Shield of California, No. CGC-03-419349 (Cal. Super. Ct. S.F. Cty.). In this class action lawsuit alleging that Blue Shield engaged in unlawful, unfair and fraudulent business practices when it modified the risk tier structure of its individual and family health care plans, Gibbs Law Group attorneys helped negotiate a \$6.5 million settlement on behalf of former and current Blue Shield subscribers residing in California. The Honorable James L. Warren granted final approval of the settlement in March 2006.

Wixon v. Wyndham Resort Development Corp., No. 07-cv-02361 (N.D. Cal.). Gibbs Law Group attorneys served as class and derivative counsel in this litigation brought against a timeshare developer and the directors of a timeshare corporation for violations of California state law. Plaintiffs alleged that the defendants violated their fiduciary duties as directors by taking actions for the financial benefit of the timeshare developer to the detriment of the owners of timeshare interests. On September 14, 2010, Judge White granted approval of a settlement of the plaintiffs' derivative claims.

Berrien, et al. v. New Raintree Resorts, LLC, et al., No. 10-cv-03125 (N.D. Cal.). Gibbs Law Group attorneys filed this class action on behalf of timeshare owners, challenging the imposition of unauthorized special assessment fees. On November 15, 2011, the parties reached a proposed settlement of the claims asserted by the plaintiffs on behalf of all class members who were charged the special assessment. On March 13, 2012, the Court issued its Final Class Action Settlement Approval Order and Judgment, approving the proposed settlement.

Benedict, et al. v. Diamond Resorts Corporation, et al., No. 12-cv-00183 (D. Hawaii). In this class action on behalf of timeshare owners, Gibbs Law Group attorneys represented plaintiffs challenging the imposition of an unauthorized special assessment fee. On November 6, 2012, the parties reached a proposed settlement of the claims asserted by the plaintiffs on behalf of all class members who were charged the special assessment. On June 6, 2013, the Court approved the settlement.

Allen Lund Co., Inc. v. AT&T Corp., No. 98-cv-1500 (C.D. Cal.). This class action lawsuit was brought on behalf of small businesses whose long-distance service was switched to Business Discount Plan, Inc. Gibbs Law Group attorneys served as class counsel and helped negotiate a settlement that provided full cash refunds and free long-distance telephone service.

Mackouse v. The Good Guys - California, Inc., No. 2002-049656 (Cal. Super Ct. Alameda Cty). This nationwide class action lawsuit was brought against The Good Guys and its affiliates alleging violations of the Song-Beverly Warranty Act and other California consumer statutes. The Plaintiff alleged that The Good Guys failed to honor its service contracts, which were offered for sale to customers and designed to protect a customer's purchase after the manufacturer's warranty expired. In May 9, 2003, the Honorable Ronald M. Sabraw granted final approval of a settlement that provides cash refunds or services at the customer's election.

Mitchell v. Acosta Sales, LLC, No. 11-cv-01796 (C.D. Cal. 2011). Gibbs Law Group attorneys and co-counsel served as class counsel representing Acosta employees who alleged that they were required to work off-the-clock and were not reimbursed for required employment expenses. We helped negotiate a \$9.9 million settlement for merchandiser employees who were not paid for all the hours they worked. The Court granted final approval of the settlement in September 2013.

Rubaker v. Spansion, LLC, No. 09-cv-00842 (N.D. Cal. 2009). Gibbs Law Group attorneys and co-counsel filed a class action lawsuit on behalf of former Spansion employees that alleged that the company had failed to provide terminated employees from California and Texas with advance notice of the layoff, as required by the Workers Adjustment and Retraining Notification Act (WARN Act). The bankruptcy court approved the class action settlement we and co-counsel negotiated in 2010. The settlement was valued at \$8.6 million and resulted in cash payments to the former employees.

Securities and Financial Fraud

Deora v. NantHealth, No. 2:17-cv-1825 (C.D. Cal.) – Gibbs Law Group serves as Co-lead Counsel for certified classes of investors in litigation alleging violations of federal securities laws related to the healthcare technology company's statements in connections with its initial public offering in 2016 and afterward. In December 2019, the parties announced they had reached a \$16.5 million class action settlement; preliminary approval is pending.

In re American Express Financial Advisors Securities Litigation, No. 04-cv-01773 (S.D.N.Y.). Ms. De Bartolomeo was among the attorneys serving as co-lead counsel in this class action, brought on behalf of individuals who bought financial plans and invested in mutual funds from American Express Financial Advisors. The case alleged that American Express steered its clients into underperforming "shelf space funds" to reap kickbacks and other financial benefits. The Court granted final approval to a cash settlement of \$100 million in addition to other relief.

Roth v. Aon Corp., No. 04-cv-06835 (N.D. Ill.). This securities fraud class action alleged that Aon Corporation and its key executives made misstatements and failed to disclose important information to investors about Aon's role in and reliance on contingent commission kickbacks and steering arrangements with insurers. Mr. Schrag helped prosecute this securities fraud class action against Aon Corporation which resulted in a \$30 million settlement for the plaintiff class.

In re Peregrine Financial Group Customer Litigation, No. 12-cv-5546 (N.D. Ill.). Mr. Stein was among the attorneys serving as co-lead counsel for futures and commodities investors who lost millions of dollars in the collapse of Peregrine Financial Group, Inc. Through several years of litigation, counsel helped deliver settlements worth more than \$75 million from U.S. Bank, N.A., and JPMorgan Chase Bank, N.A.

In re Chase Bank USA, N.A. "Check Loan" Contract Litigation, No. 09-2032 (N.D. Cal.). Gibbs Law Group attorneys and counsel from several firms led this nationwide class action lawsuit alleging deceptive marketing and loan practices by Chase Bank USA, N.A. After a nationwide class was certified, U.S. District Court Judge Maxine M. Chesney granted final approval of a \$100 million settlement on behalf of Chase cardholders.

In re Winstar Communications Securities Litigation, No. 01-cv-11522 (S.D.N.Y.). Gibbs Law Group attorneys represented Allianz of America, Inc., Fireman's Fund and other private institutional investors against Grant Thornton and other defendants arising out of plaintiffs' investments in Winstar Communications, Inc. The firm achieved a settlement on the eve of trial that provided a recovery rate more than 30 times higher than what class members received in a related class action. The recovery (after attorney fees) returned a remarkable 78.5% of the losses plaintiffs may have recovered at trial.

CalSTRS v. Qwest Communications, et al., No. 415546 (Cal. Super. Ct. S.F. Cty.). Ms. De Bartolomeo served as co-lead counsel representing the California State Teachers Retirement System in this opt-out securities fraud case against Qwest Communications, Inc. and certain of its officers and directors, as well as its outside auditor Arthur Andersen. The case resulted in a precedent-setting \$45 million settlement for California school teachers.

Mitchell v. American Fair Credit Association, No. 785811-2 (Cal. Super. Ct. Alameda Cty.); ***Mitchell v. Bankfirst, N.A.***, No. 97-cv-01421 (N.D. Cal.). This class action lawsuit was brought on behalf of California members of the American Fair Credit Association (AFCA). Plaintiffs alleged that AFCA operated an illegal credit repair scheme. The Honorable James Richman certified the class and appointed the firm as class counsel. In February 2003, Judge Ronald Sabraw of the Alameda County Superior Court and Judge Maxine Chesney of the U.S. District Court for the Northern District of California granted final approval of settlements valued at over \$40 million.

Data Breach and Privacy

In re Equifax, Inc. Customer Data Security Breach Litig., MDL No. 2800, No. 1:17-md-2800 (N.D. Ga.) Gibbs Law Group attorneys serve on the Plaintiffs' Executive Committee in this nationwide class action stemming from a 2017 data breach that exposed social security numbers, birth dates, addresses, and in some cases, credit card numbers of more than 147 million consumers. On January 13, 2020, the Court granted final approval to a settlement valued at \$1.5 billion. Gibbs Law Group attorneys played an integral role in negotiating key business practice changes, including overhauling Equifax's handling of consumers' personal information and data security.

In re Anthem, Inc. Data Breach Litig., MDL No. 2617, No. 15-md-02617 (N.D. Cal.). Gibbs Law Group attorneys serve as part of the four-firm leadership team in this nationwide class action stemming from the largest healthcare data breach in history affecting approximately 80 million people. On August 15, 2018, the Court granted final approval to a \$115 million cash settlement.

In re: Vizio, Inc. Consumer Privacy Litigation, MDL No. 8:16-ml-02963 (C.D. Cal.). Gibbs Law Group attorneys are co-lead counsel in this multi-district lawsuit alleging that Vizio collected and sold data about consumers' television viewing habits and their digital identities to advertisers without consumers' knowledge or consent. Counsel achieved an important ruling on the application of the Video Privacy Protection Act (VPPA), a 1988 federal privacy law, which had never been extended to television manufacturers. The firm negotiated a settlement providing for class-wide injunctive relief transforming the company's data collection practices, as well as a \$17 million fund to compensate consumers who were affected. In granting preliminary approval, Judge Josephine Staton stated, "I'm glad I appointed all of you as lead counsel, because -- it probably is the best set of papers I've had on preliminary approval." She also noted "[E]very class member will benefit from the injunctive relief." On July 31, 2019, the Court granted final approval of the settlement.

In re Adobe Systems Inc. Privacy Litig., No. 13-cv-05226 (N.D. Cal.). In this nationwide class action stemming from a 2013 data breach, attorneys from Gibbs Law Group served as lead counsel on behalf of the millions of potentially affected consumers. Counsel achieved a landmark ruling on Article III standing (which has since been relied upon by the Seventh Circuit Court of Appeals and other courts) and then went on to negotiate a settlement requiring Adobe to provide enhanced security relief—including the implementation and maintenance of enhanced intrusion detection, network segmentation, and encryption.

Whitaker v. Health Net of Cal., Inc., et al., No. 11-cv-00910 (E.D. Cal.); *Shurtleff v. Health Net of Cal., Inc.*, No. 34-2012-00121600 (Cal. Super Ct. Sacramento Cty). Gibbs Law Group attorneys served as co-lead counsel in this patient privacy case. On June 24, 2014, the court granted final approval of a settlement that provided class members with credit monitoring, established a \$2 million fund to reimburse consumers for related identity theft incidents, and instituted material upgrades to and monitoring of Health Net’s information security protocols.

Smith v. Regents of the University of California, San Francisco, No. RG-08-410004 (Cal. Super Ct. Alameda Cty). Gibbs Law Group attorneys represented a patient who alleged that UCSF’s disclosure of its patients’ medical data to outside vendors violated California medical privacy law. The firm succeeded in negotiating improvements to UCSF’s privacy procedures on behalf of a certified class of patients of the UCSF medical center. In approving the stipulated permanent injunction, Judge Stephen Brick found that “plaintiff Smith has achieved a substantial benefit to the entire class and the public at large.”

Mass Tort

In re Actos Pioglitazone-Products Liability Litigation, No. 6:11-md-2299 (W.D. La.). Ms. De Bartolomeo was among those court-appointed to the Plaintiffs Steering Committee and also served on the Daubert and Legal Briefing Committees, in litigation that resulted in a \$2.37 billion settlement.

In re Yasmin and Yaz (Drospirenone) Marketing, Sales, Practices and Products Liability Litigation, MDL No. 2385, No. 3:09-md-02100 (S.D. Ill.). In litigation that ultimately resulted in settlements worth approximately \$1.6 billion, Ms. De Bartolomeo was appointed to the Plaintiffs Steering Committee and served as Co-Chair of the Plaintiffs’ Law and Briefing Committee.

In re Pradaxa (Dabigatran Etexilate) Products Liability Litigation, MDL No. 2385, No. 3:12-md-02385 (S.D. Ill.), Ms. De Bartolomeo was appointed by the court to the Plaintiffs Steering Committee in mass tort litigation that resulted in settlements worth approximately \$650 million.

In re: Sulzer Hip Prosthesis And Knew Prosthesis Liability Litigation, MDL No. 1401 (N.D. Ohio); Cal. JCCP No. 4165 (Cal. Super. Court, Alameda Cty). Mr. Schrag helped recover over \$10 million on behalf of his clients in this multidistrict litigation.

In Re Medtronic, Inc. Implantable Defibrillators Product Liability Litigation, No. 05-md-1726 (D.Minn.). Ms. De Bartolomeo served on the discovery and law committees and provided legal, discovery, and investigative support in this lawsuit, following a February 2005 recall of certain models of Medtronic implantable cardioverter defibrillator devices. Approximately 2,000 individual cases were filed around the country and consolidated in an MDL proceeding in District Court in Minnesota. The cases were settled in 2007 for \$75 million.

Deceptive Marketing

Hyundai and Kia Fuel Economy Litigation, No. 2:13-md-2424 (C.D. Cal.). In a lawsuit alleging false advertising of vehicle fuel efficiency, the court appointed Eric Gibbs as liaison counsel. Mr. Gibbs regularly reported to the Court, coordinated a wide-ranging discovery process, and advanced the view of plaintiffs seeking relief under the laws of over twenty states. Ultimately Mr. Gibbs helped negotiate a revised nationwide class action settlement with an estimated value of up to \$210 million. The Honorable George H. Wu wrote that Mr. Gibbs had “efficiently managed the requests from well over 20 different law firms and effectively represented the interests of Non-Settling Plaintiffs throughout this litigation. This included actively participating in revisions to the proposed settlement in a manner that addressed many weaknesses in the original proposed settlement.”

In Re Mercedes-Benz Tele Aid Contract Litigation, MDL No. 1914, No. 07-cv-02720 (D.N.J.). Gibbs Law Group attorneys and co-counsel served as co-lead class counsel on behalf of consumers who were not told their vehicles’ navigation systems were on the verge of becoming obsolete. Counsel successfully certified a nationwide litigation class, before negotiating a settlement valued between approximately \$25 million and \$50 million. In approving the settlement, the court acknowledged that the case “involved years of difficult and hard-fought litigation by able counsel on both sides” and that “the attorneys who handled the case were particularly skilled by virtue of their ability and experience.”

In re Providian Credit Card Cases, JCCP No. 4085 (Cal. Super. Ct. San Francisco Cty). Mr. Gibbs played a prominent role in this nationwide class action suit brought on behalf of Providian credit card holders. The lawsuit alleged that Providian engaged in unlawful, unfair and fraudulent business practices in connection with the marketing and fee assessments for its credit cards. The Honorable Stuart Pollack approved a \$105 million settlement, plus injunctive relief—one of the largest class action recoveries in the United States arising out of consumer credit card litigation.

In re Hyundai and Kia Horsepower Litigation, No. 02CC00287 (Cal. Super. Ct. Orange Cty). In a class action on behalf of U.S. Hyundai and Kia owners and lessees, contending that Hyundai advertised false horsepower ratings in the United States, attorneys from Gibbs Law Group negotiated a class action settlement valued at between \$75 million and \$125 million which provided owners nationwide with cash payments and dealer credits.

In re MCI Non-Subscriber Telephone Rates Litigation, MDL No. 1275 (S.D. Ill.). This class action lawsuit was brought on behalf of MCI subscribers charged various rates and surcharges instead of the lower rates MCI had advertised. Ten cases were consolidated for pretrial proceedings before the Honorable David R. Herndon. Judge Herndon appointed co-lead counsel for the consolidated actions and Ms. De Bartolomeo played a significant role in the litigation. On March 29, 2001, Judge Herndon granted final approval of a settlement for over \$90 million in cash.

Skold v. Intel Corp., No. 1-05-cv-039231 (Cal. Super. Ct. Santa Clara Cty.). Gibbs Law Group attorneys represented Intel consumers through a decade of hard-fought litigation, ultimately certifying a nationwide class under an innovative “price inflation” theory and negotiating a settlement that provided refunds and \$4 million in cy pres donations. In approving the settlement, Judge Peter Kirwan wrote: “It is abundantly clear that Class Counsel invested an incredible amount of time and costs in a case which lasted approximately 10 years with no guarantee that they would prevail.... Simply put, Class Counsel earned their fees in this case.”

Steff v. United Online, Inc., No. BC265953 (Cal. Super. Ct. Los Angeles Cty.). Mr. Gibbs served as lead counsel in this nationwide class action suit brought against NetZero, Inc. and its parent, United Online, Inc., by former NetZero customers. Plaintiffs alleged that defendants falsely advertised their internet service as unlimited and guaranteed for a specific period of time. The Honorable Victoria G. Chaney of the Los Angeles Superior Court granted final approval of a settlement that provided full refunds to customers whose services were cancelled and which placed restrictions on Defendants' advertising.

Khaliki v. Helzberg's Diamond Shops, Inc., No. 11-cv-00010 (W.D. Mo.). Gibbs Law Group attorneys and co-counsel represented consumers who alleged deceptive marketing in connection with the sale of princess-cut diamonds. The firms achieved a positive settlement, which the court approved, recognizing "that Class Counsel provided excellent representation" and achieved "a favorable result relatively early in the case, which benefits the Class while preserving judicial resources." The court went on to recognize that "Class Counsel faced considerable risk in pursuing this litigation on a contingent basis, and obtained a favorable result for the class given the legal and factual complexities and challenges presented."

Defective Products

Glenn v. Hyundai Motor America, Case No. 8:15-cv-02052 (C.D. Cal.). Gibbs Law Group attorneys represented drivers from six states who alleged their vehicles came with defective sunroofs that could shatter without warning. The case persisted through several years of fiercely contested litigation before resolving for a package of class-wide benefits conservatively valued at over \$30 million. In approving the settlement, U.S. District Court Judge David O. Carter praised the resolution: "[T]his is an extraordinarily complex case and an extraordinarily creative solution."

Amborn et al. v. Behr Process Corp., No. 17-cv-4464 (N.D. Ill.) Gibbs Law Group served as co-lead counsel in this coordinated lawsuit against Behr and Home Depot alleging that Behr's DeckOver deck resurfacing product is prone to peeling, chipping, bubbling, and degrading soon after application. The team negotiated a class-wide settlement, which provided class members who submitted claims with 1) a refund for their purchase; and 2) substantial compensation for money spent removing DeckOver or repairing their deck. The settlement was granted final approval on December 19, 2018.

In re Hyundai Sonata Engine Litigation, Case No. 5:15-cv-01685 (N.D. Cal.). Gibbs Law Group attorneys served as court-appointed co-lead class counsel on behalf of plaintiffs who alleged their 2011-2014 Hyundai Sonatas suffered premature and catastrophic engine failures due to defective rotating assemblies. We negotiated a comprehensive settlement providing for nationwide recalls, warranty extensions, repair reimbursements, and compensation for class members who had already traded-in or sold their vehicles at a loss. The average payment to class members exceeded \$3,000.

Sugarman v. Ducati North America, Inc., No. 10-cv-05246 (N.D. Cal.). Gibbs Law Group attorneys served as class counsel on behalf of Ducati motorcycle owners whose fuel tanks on their motorcycles degraded and deformed due to incompatibility with the motorcycles' fuel. In January 2012, the Court approved a settlement that provided an extended warranty and repairs, writing, "The Court recognizes that class counsel assumed substantial risks and burdens in this litigation. Representation was professional and competent; in the Court's opinion, counsel obtained an excellent result for the class."

Parkinson v. Hyundai Motor America, No. 06-cv-00345 (C.D. Cal.). Gibbs Law Group attorneys served as class counsel in this class action featuring allegations that the flywheel and clutch system in certain Hyundai vehicles was defective. After achieving nationwide class certification, our lawyers negotiated a settlement that provided for reimbursements to class members for their repairs, depending on their vehicle's mileage at time of repair, from 50% to 100% reimbursement. The settlement also provided full reimbursement for rental vehicle expenses for class members who rented a vehicle while flywheel or clutch repairs were being performed. After the settlement was approved, the court wrote, "Perhaps the best barometer of ... the benefit obtained for the class ... is the perception of class members themselves. Counsel submitted dozens of letters from class members sharing their joy, appreciation, and relief that someone finally did something to help them."

Browne v. Am. Honda Motor Co., Inc., No. 09-cv-06750 (C.D. Cal.). Gibbs Law Group attorneys and co-counsel represented plaintiffs who alleged that about 750,000 Honda Accord and Acura TSX vehicles were sold with brake pads that wore out prematurely. We negotiated a settlement in which improved brake pads were made available and class members who had them installed could be reimbursed. The settlement received final court approval in July 2010 and provided an estimated value of \$25 million.

In Re General Motors Dex-Cool Cases., No. HG03093843 (Cal. Super Ct. Alameda Cty). Gibbs Law Group attorneys served as co-lead counsel in these class action lawsuits filed throughout the country, where plaintiffs alleged that General Motors' Dex-Cool engine coolant damaged certain vehicles' engines, and that in other vehicles, Dex-Cool formed a rusty sludge that caused vehicles to overheat. After consumer classes were certified in both Missouri and California, General Motors agreed to cash payments to class members nationwide. On October 27, 2008, the California court granted final approval to the settlement.

In re iPod Cases, JCCP No. 4355 (Cal. Super. Ct. San Mateo Cty). Mr. Gibbs, as court appointed co-lead counsel, negotiated a settlement that provided warranty extensions, battery replacements, cash payments, and store credits for class members who experienced battery failure. In approving the settlement, the Hon. Beth L. Freeman said that the class was represented by "extremely well qualified" counsel who negotiated a "significant and substantial benefit" for the class members.

Roy v. Hyundai Motor America, No. 05-cv-00483 (C.D. Cal.). Gibbs Law Group attorneys served as co-lead counsel in this nationwide class action suit brought on behalf of Hyundai Elantra owners and lessees, alleging that an air bag system in vehicles was defective. Our attorneys helped negotiate a settlement whereby Hyundai agreed to repair the air bag systems, provide reimbursement for transportation expenses, and administer an alternative dispute resolution program for trade-ins and buy-backs. In approving the settlement, the Honorable Alicemarie H. Stotler presiding, described the settlement as "pragmatic" and a "win-win" for all involved.

Velasco v. Chrysler Group LLC, No. 2:13-cv-08080 (C.D. Cal.). In this class action, consumers alleged they were sold and leased vehicles with defective power control modules that caused vehicle stalling. Gibbs Law Group attorneys and their co-counsel defeated the majority of Chrysler's motion to dismiss and engaged in extensive deposition and document discovery. In 2015, the parties reached a settlement contingent on Chrysler initiating a recall of hundreds of thousands of vehicles, reimbursing owners for past repairs, and extending its warranty for the repairs conducted through the recall. When he granted final settlement approval, the Honorable Dean D. Pregerson acknowledged that the case had been "hard fought" and "well-litigated by both sides."

Edwards v. Ford Motor Co., No. 11-cv-1058 (S.D. Cal.). This lawsuit alleged that Ford sold vehicles despite a known safety defect that caused them to surge into intersections, through crosswalks, and up on to curbs. The litigation twice went to the U.S. Court of Appeals for the Ninth Circuit, with plaintiff prevailing in both instances. In the first instance, the appellate court reversed the trial court's denial of class certification. In the second, the Ninth Circuit affirmed the ruling below that plaintiff's efforts had generated free repairs, reimbursements, and extended warranties for the class.

Sanborn, et al. v. Nissan North America, Inc., No. 00:14-cv-62567 (S.D. Fla.). Gibbs Law Group litigated this action against a vigorous defense for two years, seeking relief for Nissan Altima owners whose dashboards were melting into a sticky, shiny, gooey surface that they alleged caused a substantial and dangerous glare. After largely prevailing on a motion to dismiss, Gibbs Law Group attorneys and their co-counsel prepared the case to the brink of trial, reaching a settlement just ten days before the scheduled trial start. The settlement allowed class members to obtain steeply discounted dashboard replacements and reimbursement toward prior replacement costs.

Bacca v. BMW of N. Am., No. 2:06-cv-6753 (C.D. Cal.) In a class action alleging that BMW vehicles suffered from defective sub-frames, we negotiated a settlement with BMW in which class members nationwide received full reimbursement for prior sub-frame repair costs as well as free nationwide inspections and program.

Government Reform

Paeste v. Government of Guam, No. 11-cv-0008 (D. Guam); Gibbs Law Group attorneys and co-counsel served as Class Counsel in litigation alleging the Government of Guam had a longstanding practice of delaying tax refunds for years on end, with the Government owing over \$200 million in past due refunds. After certifying a litigation class, Plaintiffs prevailed on both of their claims at the summary judgment stage, obtaining a permanent injunction that reformed the government's administration of tax refunds. The judgment and injunction were upheld on appeal in a published decision by the Ninth Circuit. *Paeste v. Gov't of Guam*, 798 F.3d 1228 (9th Cir. 2015).

EXHIBIT E



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Rick Paul and Ashlea Schwarz founded Paul LLP after years of litigating high stakes cases involving complex litigation. We have fought against some of the biggest companies in the country, including Syngenta, Monsanto, JPMorgan Chase, Phillips 66, Commerce Bank, General Motors, and Wal-Mart. And we have won big. We founded the firm on two overriding principles: (1) a strong passion for litigating cases on behalf of our clients; and (2) a desire to make meaningful, industry-wide changes that create reshaped markets and improved lives.

We have recovered more than two billion dollars for our clients through trial, arbitration, and settlement. We have handled some of the largest cases in the country against the largest, most well-funded and well-represented companies. And, we don't just litigate—we prepare these cases for trial and take these cases to trial.

The Work We Do

Agriculture: The agricultural industry is rapidly consolidating and is launching new biotechnology products every year. Located in the Midwest, we have a deep knowledge of how law and agriculture intersect, including the areas of negligence, chemical-drift, trespass, antitrust, food safety, trade, marketing, and resource management. The agricultural and biotechnology industries are highly regulated with a complex web of state and federal regulations, many of which give rise to preemption issues. Our lawyers have handled a wide variety of cases in this area of the law and are well-versed in the statutory and regulatory issues that arise in litigation related to agricultural in individual, mass, and class actions.



Antitrust: Antitrust laws were enacted to ensure that businesses play by the rules to ensure that a free market prevails. Our lawyers have both prosecuted and defended antitrust actions in the agriculture, technology, and health care industries. We handle both antitrust class actions as well as individual cases. We make sure that companies who engage in unfair business practices are kept in check, allowing other businesses the opportunity to compete in a fair marketplace.

Class Actions: We know how difficult it is for a single person to bring a case against a large corporation or entity. The enormity of this task prevents many people from pursuing legitimate claims, which allows companies to continue with unsafe, unlawful, or unfair practices. These are often pervasive, industry-wide violations. Our attorneys have the assets and skill sets necessary to bring about meaningful change whether it be through mass or class actions.

Commercial Litigation: Partnerships within or between businesses often lead to disputes. When partnerships are exploited, or contracts are not followed through on, we help pick up the pieces.

Commodities: Being a Midwest law firm, we know commodities litigation. From grains, farm animals, oil and gas, precious metals, we have handled a broad spectrum of commodities-related litigation. We are familiar with the commodities exchanges, the statutory and regulatory environment, and the jargon of these industries.

Employment: Federal and state laws exist to ensure employees are paid and treated fairly. Unfortunately, many companies skirt those laws to widen their profit margins and take advantage of employee labor. We have experience taking on some of the largest international corporations regarding independent contractor/employee misclassification, unreimbursed business expenses, unpaid wages, executive termination, and WARN Act violations.

Intellectual Property: Great ideas deserve protection. That's why laws exist to guard intellectual property, including copyright, trademarks, and patents. When works and ideas created by an individual or company are exploited by others, we help ensure that credit is duly awarded. Our contingency fee structuring allows individuals to bring cases they otherwise may not be able to afford.

Products Liability: We have a breadth of experience in ensuring manufacturers take responsibility for products that cause harm or injury to consumers. Injury and financial harm can result from products with faulty design or improper manufacturing, as well as a



company's failure to warn consumers of possible injury or unwanted side effects from use of that product.

The Results We Have Achieved

In re Syngenta MIR162 Corn Litigation (District of Kansas, MDL 2591) and *In re Syngenta Litigation* (Minnesota Fourth Judicial District) (appointed to Plaintiffs Executive Committee in both federal and state MDLs; trial counsel for individual bellwether and Minnesota class leading to \$1.51 billion settlement)

In re General Motors Dex-Cool Cases (Alameda County Superior Court, California; Jackson County Circuit Court, Missouri; Southern District of Illinois, MDL 1562) (appointed Co-Lead Counsel in federal MDL and as Co-Lead Class Counsel in two state courts; obtained one of the largest automotive defect settlements of all time)

In re Eclipse Aviation Depositor Litigation (Bernalillo County, New Mexico) (negotiated settlement of approximately \$49,000,000 on behalf of purchasers of jet aircraft)

In re: Air Crash of N51RX (Santa Fe County, New Mexico) (negotiated complex 8-figure settlement in a 5-death air ambulance crash with multiple defendants and insurance companies)

Malloy v. Pratt & Whitney (U.S. District Court, Northern District of Oklahoma) (\$2.1 million settlement of product liability claim for defective aircraft engines)

In re Great Plains Air Lines (U.S. Bankruptcy Court, Northern District of Oklahoma) (negotiated confidential settlement with officers and directors of defunct regional airline carrier)

In re Mountain Energy Corp. (U.S. Bankruptcy Court, Western District of Missouri) (officer/director liability, negotiated 14-party settlement with more than \$60 million recovery)

In re Oak Hills Drilling & Operating Co. (U.S. Bankruptcy Court, Eastern District of Oklahoma) (obtained judgment after trial for over \$1.5 million on behalf of bankruptcy estate)



De La Cruz v. Masco Retail Cabinet Group (Arbitration – AAA) (obtained \$2.6 million arbitration award for group of account representatives who were misclassified in violation of the FLSA)

Malloy v. Commerce Bank (District Court of Tulsa County, Oklahoma) (negotiated settlement for claims alleging aiding and abetting breach of fiduciary duty, fraudulent transfers, and civil conspiracy on behalf of bankruptcy estate)

Sanchez v. DISH Network LLC (Arbitration – AAA) (received \$2.9 million judgment on behalf of 3,000 call center employees seeking unpaid overtime wages under the FLSA)

Cabrerros, et al. v. Spansion, LLC et al. (U.S. Bankruptcy Court, District of Delaware) (negotiated \$8 million settlement of a California class action for violations of the Worker Adjustment and Retraining Notification Act)



The Lawyers and Reputation We Enjoy



Rick Paul

Rick, managing partner of Paul LLP, specializes in complex antitrust, business, bankruptcy, product liability, and consumer litigation—typically involving multi-parties, class or mass actions, or bankruptcy estates. Rick graduated from the University of Missouri-Columbia School of Law, where he served as Associate Managing Editor of the Missouri Law Review. After law school, Rick was a judicial law clerk at the Missouri Supreme Court and the Missouri Court of Appeals, Western District. In 1996, he began private practice with the firm formerly known as Shughart Thomson & Kilroy, a large Kansas City law firm with offices in Missouri, Kansas, Colorado, and Arizona. In 2002, the Board of Directors of Shughart Thomson elected him a Shareholder and Director. In 2008, Rick moved his practice to Stueve Siegel Hanson LLP. In May 2013, Rick started Paul LLP.

Rick has recovered more than \$2 billion for his clients through trial or settlement. Rick has been appointed by numerous courts across the country to serve as lead counsel in class actions and MDL proceedings and as special litigation counsel for bankruptcy trustees. Currently, Rick is serving as interim co-lead counsel in a consolidated antitrust class action in the United States District Court for the District of New Jersey against Jackson Hewitt. Additionally, Rick serves on the Plaintiffs' Executive Committee, as lead of the antitrust track, in *In re Dicamba Herbicides Litigation*, MDL 2820, pending in the United States District Court for the Eastern District of Missouri.

Rick enjoys being in the courtroom and has tried and won many types of cases in jury trials, bench trials, and arbitrations. He has repeatedly been brought in to a case shortly before trial for just that purpose. Recently, Rick served as trial counsel in the *In re Syngenta Litigation* pending in Minnesota state court. Rick was co-lead trial counsel for the first individual bellwether trial as well as the Minnesota class action trial. During the third week of the Minnesota class trial, the litigation was settled on behalf of all farmers (individual and classes) across the country. This is just the most recent in a string of cases where Rick has been lead trial counsel, including two class arbitrations, where he prevailed in both. He has also argued more than 40 appeals to various state and federal appellate courts and briefed over 100 appeals.



Rick is active in the Kansas City Metropolitan Bar Association. In 2004, he served as the Chair of the Appellate Courts Committee of the KCMBA. He has also served as Vice-Chair on the Business Torts Committee, where he authored the Chapter on Fiduciary Duties for the Business Torts Handbook. Rick is a frequent speaker and moderator at seminars and presentations on handling appeals, electronic discovery, and the use of technology in the courtroom. In 2006, Missouri Lawyers Weekly named Rick as one of eight “Up and Coming Lawyers.” He has also been named a “Missouri/Kansas Super Lawyer,” and is listed on American Registry’s “Top Attorneys in Missouri/Kansas.” He has an AV Preeminent Peer Review Rating with Martindale-Hubbell.

Court Admissions

Missouri, 1995	U.S. Court of Appeals, 9th Circuit
Kansas, 1997	U.S. Court of Appeals, 10th Circuit
U.S. Supreme Court	U.S. Court of Appeals, 11th Circuit
U.S. Court of Appeals, 3rd Circuit	U.S. District Court, District of Colorado
U.S. Court of Appeals, 4th Circuit	U.S. District Court, District of Kansas
U.S. Court of Appeals, 6th Circuit	U.S. District Court, Eastern District of Missouri
U.S. Court of Appeals, 7th Circuit	U.S. District Court, Western District of Missouri
U.S. Court of Appeals, 8th Circuit	U.S. District Court, Eastern District of Wisconsin

Education

University of Missouri-Columbia School of Law, Columbia, Missouri, 1995
 J.D., Assistant Managing Editor, Missouri Law Review
 University of Missouri, Columbia, Missouri, 1992
 B.A., Economics and Political Science, Honors College
Honors: MU Varsity Tennis Team, Letter winner; Academic All Big-8



Ashlea Schwarz

Ashlea litigates complex business disputes including claims for antitrust, breach of contract, breach of fiduciary duty, and fraud, typically in class or multi-party actions. Ashlea has represented thousands of clients from the inception of a case through a verdict and litigated over 50 mass and class actions. Ashlea has taken 6 cases to trial, including two collective/class actions where she recovered over \$5 million collectively for her clients. Her practice is nationwide and traditionally includes multi-party and multi-district litigation.

Ashlea remains involved in the legal community through her work as a board member for the Kansas City Bar Association’s Federal Court Advocates Section, subcommittee chair for American Women Lawyers, and participation in the Lawyers Association of Kansas City. She is a contributing author for the American Bar Association’s yearly FLSA Midwinter Report and co-author of *FLSA Arbitration Strategies* for the April 2013 edition of Trial Magazine, Employment Law. In 2014, she was named one of Missouri Lawyers’ Weekly’s “Up and Coming Lawyers,” an award recognizing litigators under age 40 who demonstrate excellence in the legal profession and in their commitment to their communities. Ashlea continues to be selected yearly as a Kansas City Business Journal Rising Star and Super Lawyers’ Missouri and Kansas Rising Star.

Court Admissions

Missouri, 2007	U.S. District Court, District of Colorado
Kansas, 2008	U.S. District Court, District of Kansas
U.S. Court of Appeals, 4th Circuit	U.S. District Court, Western District of Missouri
U.S. Court of Appeals, 10th Circuit	

Education

University of Kansas School of Law, Lawrence, Kansas, 2007
J.D., Clerk for Judge Julie Robinson, U.S. District, District of Kansas, 2005-2006
Honors: P. Mize Award for Trial Advocacy, Robert F. Bennett Award for Public Service

Kansas State University, Manhattan, Kansas, 2004



B.A. in Journalism and Mass Communications and minors in English and German
Honors: Phi Beta Kappa, Phi Kappa Phi, Golden Key, Journalism and Mass
Communication Ambassador, K-State Student Foundation Board Member, University
Ambassador



Sean Cooper

Sean focuses his practice on complex commercial litigation, class actions, wrongful death and catastrophic injury, antitrust litigation, mass torts and wage and hour litigation. Sean earned his J.D. from the University of Kansas School of Law in 2013. During law school, Sean was an Associate Editor of the Kansas Law Review and won CALL Excellence for the Future Awards in KU's Immigration and Asylum Clinic and International Human Rights Law. Before law school, Sean earned a B.A. in English from Truman State University and graduated summa cum laude. Sean also received his M.A. in English from Truman State, where he was graduate student of the year in the English program. Sean was a four-year varsity tennis player at Truman State, posting one of the winningest records in school history. After receiving his M.A., Sean taught English as a second language in Bangkok, Thailand.

Court Admissions

Missouri, 2013	U.S. Court of Appeals, 8th Circuit
Kansas, 2014	U.S. District Court, District of Kansas
U.S. Court of Appeals, 7th Circuit	U.S. District Court, Western District of Missouri

Education

University of Kansas School of Law, Lawrence, Kansas, 2013 J.D.
Truman State University
M.A., English, 2008
B.A., English, 2006 – summa cum laude



Laura Fellows

Laura Fellows is a native of Arkansas and focuses her practice on complex business litigation, antitrust litigation, class/mass actions, and personal injury matters. Laura has represented class and collective action plaintiffs, as well as individual plaintiffs, in contract, employment, and wage and hour litigation throughout the country. Laura has also represented plaintiffs in individual arbitration actions, including recently first-chairing an individual misclassification arbitration to a plaintiff's victory. She has been named a

Super Lawyers' Missouri/Kansas Rising Star yearly since 2015.

During law school, Laura was on the national team for the American Bar Association's Negotiation Competition, reaching the semi-final round of the national competition. Laura also served as president of the Association for Women Law Students. Before law school, Laura attended Missouri State University as a Board of Governor's Scholar and member of the honors college. Also, while at Missouri State, Laura served as the homecoming philanthropy chair, helping establish the "Can-Structure" event to benefit Ozarks Food Harvest. Outside of the office, Laura enjoys fostering dogs through her local animal rescue center.

Court Admissions

Missouri, 2013

U.S. Court of Appeals, 8th Circuit

Kansas, 2014

U.S. District Court, Western District of Missouri

Arkansas, 2015

U.S. District Court, District of Kansas

U.S. District Court, Eastern District of Arkansas

U.S. District Court, Western District of Arkansas

Education

University of Missouri Kansas City School of Law, 2013 J.D.

Missouri State University, 2010

B.A. in Communications and minor in German, *Cum Laude* in the Honors College

Honors: Board of Governors Scholar



Nick Leyh

Nick Leyh joined Paul LLP after his graduation from the University of Missouri School of Law in 2019. Nick focuses his practice on mass torts, personal injury, breach of contract actions, and fraudulent practices.

At the University of Missouri School of Law, Nick served on the board of the Journal of Dispute Resolution as web editor. He also wrote a published article on the Consumer Financial Protection Bureau’s failed arbitration rule titled “The Rise and Fall of the Consumer Financial Protection Bureau’s Arbitration Rule.” Nick also participated in moot court and mediation competitions.

Before law school, Nick studied English literature, Greek history and philosophy. After graduating college, Nick worked in Washington, D.C. for the United States Interagency Council on Homelessness. He enjoys fishing in both Missouri and Minnesota in his free time.

Court Admissions

Missouri, 2019
U.S. District Court, Western District of Missouri

Education

University of Missouri School of Law
J.D. 2019
Macalester College
B.A., English Literature and Classical Civilizations; Concentration: Critical Theory, 2013
Honors: Cum Laude, Eta Sigma Phi, Sigma Tau Delta, *Dean’s List*



Kyle Taylor

Kyle is a native of St. Joseph, Missouri. Prior to attending law school, Kyle was a professionally certified tennis instructor in the Kansas City, Kansas and Colorado Springs, Colorado areas. In 2019, Kyle joined Paul LLP where his practice focuses on toxic tort litigation.

Court Admissions

Missouri, 2019
U.S. District Court, Western District of Missouri

Education

University of Missouri – Kansas City
J.D. 2017
William Jewell College
B.A., Political Science and Psychology, 2011
Honors: Dean's List, Scholar-Athlete, Varsity Tennis Team,
Team Captain, School Record Holder: All-Time Wins



George Brand

George focuses his practice on complex matters involving antitrust, mass torts, personal injury, employment matters, business litigation, breach of contract, and fraudulent practices. He joined Paul LLP after graduating with J.D. and M.B.A. degrees from the University of Missouri in 2019. During law school, he was Lead Articles Editor for the Missouri Law Review, President of the Federal Bar Association, and President of the Tax and Transactional Law Society. He was on the Moot Court team and served on the Honor Code, Faculty Appointment, and Career Development committees and the Tim Heinsz 5K Steering Committee. He also taught Business Law, Employment Law, and Business Etiquette and Professionalism courses to undergraduate students in the Trulaske College of Business.

Before law school, George attended St. Olaf College and then later taught English at Chiang Mai University in Thailand and led backpacking treks for kids in the European Alps. He enjoys traveling to new places and trying to grow things besides weeds in his backyard vegetable garden.

Court Admissions

Missouri, 2020
U.S. District Court, Western District of Missouri

Education

University of Missouri
J.D. 2019
M.B.A. 2019, Outstanding Graduate Award

St. Olaf College
B.A. History, Religion, and American Studies, Concentrations in Latin American Studies and Spanish, *Cum Laude*, 2014
Honors: Dean's List, Phi Alpha Theta, Theta Alpha Kappa